

## COMMITTEE REPORT

BY THE DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES  
READING BOROUGH COUNCIL  
PLANNING APPLICATIONS COMMITTEE: 13 January 2021

**Ward:** Abbey

**Application Nos.:** 192032/HYB, 200822/NMA, 200823/NMA, 190441, 190442

**Address:** Station Hill, Reading

**Proposals:**

### **192032/HYB:**

Hybrid application comprising:

(i) application for Full Planning Permission for Phase 2 (Plot G and public realm) including demolition of existing structures, erection of an eighteen storey building containing office use (Class B1) and flexible retail, non-residential institution and assembly and leisure uses (Class A1, A2, A3, A4, A5, D1 and D2). Provision of podium deck, vehicular access and parking. New public open space and landscaping. Bridge link over Garrard St, and

(ii) Application for Outline Planning Permission for Phase 3 (all Matters reserved) for four building plots (A, B, C and D). Demolition of existing buildings and structures. Mixed-use redevelopment comprising residential dwellings (Class C3), hotel (Class C1), residential institutions (Class C2), office use (Class B1). Flexible Retail, financial and professional services, restaurants and cafes, drinking establishments, hot food takeaways, non-residential institutions and assembly and leisure (Class A1, A2, A3, A4, A5, D1 and D2). Provision of podium deck and basement storey running beneath Phase 2 and 3. Formation of pedestrian and vehicular access. Means of access and circulation and car parking within the site. Provision of new public open space and landscaping.

**Applicant:** SH Reading Master LLP

**Date received (valid):** 7 January 2020

**26 Week dates:** 7 July 2020

**PPA: Agreed target:** 31 July 2020 (agreed EOT)

### **200822/NMA**

Non-Material Amendment to permitted application 190466 to allow changes to Plot F associated with changes to Friars Walk landscaping and interface with Garrard Street bridge link proposed under 192032/HYB.

**Applicant:** SH Reading Master LLP

**Date received (valid):** 16 June 2020

**Target:** 14 July 2020

### **200823/NMA**

Non-Material Amendment to permitted application 190465 to allow changes to Plot E including changes to Friars Walk landscaping and interface with Garrard Street bridge link proposed under 192032/HYB.

**Applicant:** SH Reading Master LLP

**Date received (valid):** 16 June 2020

**Target:** 14 July 2020

#### **190441/VAR**

Outline application (pursuant to section 73 of the Town & Country Act 1990) for mixed use redevelopment of the site through the demolition and alteration of existing buildings and erection of new buildings & structures to provide Offices (Use Class B1), a range of town centre uses including retail and related uses (Use Class A1-A5) leisure (Use Class D2) and residential units, associated infrastructure, public realm works and ancillary development (all matters reserved) as permitted by planning permission 151427 granted on 26 July 2016 (which itself was an application under S73 to vary planning permission 130436 granted on 9 January 2015) but without complying with Conditions 3, 5, 7, 8, 17, 19, 54 and 57 in respect of Plot F 'Station Hill'.

**And proposed Deed of Variation to existing S106 legal agreement to insert Build to Rent clawback provisions.**

#### **190442/VAR**

Outline application with all matters reserved for mixed use redevelopment of Plot E of the Station Hill site and neighbouring Telecom House site (48 to 51 Friar Street & 4 to 20 Garrard Street) to comprise the demolition of existing buildings and erection of new buildings/ structures to provide residential units, a range of town centre uses including retail and related uses (Use Class A1 - A5), associated infrastructure, public realm works and ancillary development as permitted by planning permission 151426 granted on 26 July 2016 but without complying with Conditions 3, 5, 6, 7, 8, 16, 17, 21, 37 and 50.

**And proposed Deed of Variation to existing S106 legal agreement to insert Build to Rent clawback provisions.**

#### **RECOMMENDATIONS:**

##### **Recommendation 1 - 192032/HYB: PHASE 2:**

Delegate to the Head of Planning, Development and Regulatory Services (HPDRS) to i) **GRANT** Full Planning Permission in respect of **Phase 2**, subject to the satisfactory completion of the Section 106 agreement or ii) Refuse Full Planning Permission if the S106 agreement is not completed by 12 February 2021 (unless a later date is agreed by the HPDRS).

**The S106 to include the following heads of terms:**

##### **Phasing**

- Not to implement any part of 190441/151427/130436 in conjunction with any part of 192032/HYB on land within 192032 site boundary.
- Not to practically complete Phase 3 prior to practical completion of Phase 2 public realm.

##### **Transport and Highways**

- To enter into s278/s38 Agreement to provide Highway Improvements located within the Phase 2 site (to be identified on a plan to be annexed to the agreement). To include a timetable for their provision but not later than first occupation of any building within the Phase 2 site, unless otherwise agreed in writing by the LPA.

- Interim Cycleway Scheme to Greyfriars Road in accordance with submitted drawing 44470-5502-TA-01c and works/costings schedule set out in Cast Consultancy document dated 15 December 2020 [to be annexed to the agreement] , to be provided prior to first occupation of any part of Phase 2 or in accordance with a timetable that shall have been agreed in writing by the LPA prior to first occupation, and maintained as approved at all times thereafter.
- £200,000 contribution payable on commencement of Phase 2 to be spent on improvements to the station underpass.
- £5,000 contribution towards Traffic Regulation Order associated with securing Highway Improvements and cycling facilities on all roads and routes surrounding the site (single contribution both phases)
- To maintain the Public Realm Areas to at least the standards reasonably required by the Council.
- Not to position commercial or residential waste bins within the public highway or Public Realm Areas and to ensure that the collection of commercial and residential waste is carried out from within the service areas within the development.
- A Travel Plan for Phase 2 including a phased timetable for implementation to be prepared and submitted to the Council for approval prior to first occupation. Implementation in accordance.
- Car parking management - strategy to be agreed in respect of use by non-occupiers.

#### **Public Realm**

- To allow unrestricted public pedestrian and cycle access to all areas of public realm as defined on an attached plan (subject to reasonable restrictions relating to short-term maintenance works).
- Provision and maintenance/retention of public lift linking the ground floor level (podium) and Station Hill street level within Phase 2.
- To pay the sum of £20,000 towards the relocation and or provision of interpretation and wayfinding signage reasonably required for improved interpretation of, and enhanced accessibility to, the Abbey Quarter prior to first occupation of the building at Plot G. [Policies EN6, CR15]

#### **Employment, Skills and Training**

- The production, implementation and monitoring of an Employment and Skills Plan (ESP) for the Construction and End User phases of the development:
- Applicant's ESP to have prior written agreement by the Council/Reading UK CIC no later than three months prior to the commencement of the development and thereafter be implemented
- In the event that the developer chooses not to provide the ESP themselves then the following will be sought in lieu of the related plan:

### *Construction Phase*

A commuted sum of £2,500 x 41,851sqm/ 1000sqm = £104,628 payable at least 3 months prior to commencement of the development within Phase 2.

### *End User Phase*

At least three months prior to first occupation of any non-residential floorspace within the Phase 2 Site a commuted sum shall be paid to the Council, calculated using the following SPD formula, (to be agreed with the Council using on predicted employee numbers where necessary): "Gross internal floor area of development (m2 )/ average employee density for development type x target percentage of jobs filled by Reading residents (50%) x percentage without level 2 skills (30%) x £1500". Employment figures to include those involved in the day-to-day operation of the Build to Rent premises. The formula sum payable to be increased by indexation from the date of permission.

- ESP monitoring fees as per SPD.

In accordance with Policies CC9 and EST SPD

### **Observatory**

- Access to a shared building amenity space (outside of any tenants demised area), on an upper floor of a building in either phase 2 or phase 3, if such space is provided. Access to be available during normal business hours (09:00-17:00), subject to pre-booking and will be granted for external business meetings/seminars/conferences/functions, and community/school groups. This access to be made available following 80% physical occupancy of the building, for minimum 35 days a year - subject to availability:
  - 7 days over Christmas period
  - 14 days over summer holidays
  - 7 days during Easter holidays
  - 7 days in November (including 5th November)To be varied in writing, not to be unreasonably withheld, having regard to any detrimental impact on leasing and operation of the building.  
[Policy CR10]

### **Public Art and Cultural Strategy**

- A Public Art, Culture and Community scheme to the value of £500,000, or equivalent contribution of £500k in the event that a scheme is not agreed within 12 months of submission. To be submitted on implementation of Phase 2 to include artistic lighting, integration with Abbey Quarter, landscaping, street furniture and children's play features, reasonable fees in preparing/agreeing strategy (up to 10%) and for at least £200k of the total amount to be spent on sculptures.
- The Council to have the ability to use, free of charge, the Phase 2 public realm areas, as defined on a plan appended to the s106, 10 days a year for community/cultural events subject to applicant priority use and consent, not to be unreasonably withheld.



## **CCTV**

- No part of Phase 2 shall be first Occupied until a CCTV Scheme providing coverage for buildings and public realm has been submitted and approved by the Council and the apparatus referred to in the Approved CCTV Scheme for that Building and Public Realm has been installed and is operational.
- The CCTV scheme to accord with Council and Thames Valley Police requirements for such a system, be compatible with the Council's/Police CCTV system; be linked into the CCTV system operating in the central area of Reading; and provide for connection to and control by the Council's town centre CCTV system.
- To be retained and maintained in accordance with the Scheme at all times thereafter.

In accordance with Policy CC9

## **Decentralised Energy**

- To provide Phase 2 Air Source Heat Pump system (or an alternative Ground Source system) in accordance with a timetable and full details and specifications to be submitted for approval by LPA prior to Phase 2 construction works [to be in accordance with submitted Energy Strategy].
- To make available for export to Phase 3 development, all heat that would otherwise be rejected from the Phase 2 decentralised energy system. The connection point(s) shall be located to minimise the cost and complexity of connecting to Phase 3.
- To include details of provision for future connections to District Heating network(s) within and beyond the site boundary, including capped-off pipework and space in plant rooms.

## **Monitoring/ legal**

- Contribution towards monitoring costs of £21,500 (index-linked from date of permission 130436/OUT) plus a separate commitment to pay the Council's reasonable legal costs in connection with the proposed S106 Agreement will be payable whether or not the Agreement is completed (total for both Phases). In accordance with Policy CC9.

## **Repayment of unpaid monies**

- Any unexpended contributions to be repaid within ten years beginning with the start of the Financial Year after the final (including phased contributions) obligation payment for each obligation is received. In accordance with policies CC9.

## **Indexation**

All financial contributions to be index-linked from date of permission unless expressly stated otherwise.

**And subject to conditions, to include:**

*1. Time limit - 3 Years*

*2. Development in accordance with approved drawings and details [list].*

*Phase 2 land to be as shown on approved drawing SHRN-CRL-SW-ZZ-PL-A-0115-P01 dated 15 May 2020*

*3. Uses as indicated on the approved drawings.*

*4. Minimum 1,214 sqm retail and leisure uses at Ground and Lower-ground floor level of the building on Plot G [activity, vitality, mixed use]*

*5. Not to develop Phase 2 other than in conjunction with permissions 190441 and 190442 and associated Reserved Matters approvals 190465 and 190466.*

**CONSTRUCTION/DEMOLITION PHASE**

*6. Demolition Management Statement and Environmental Management Plan, to include vermin control, temporary parking and turning. Pre-commencement.*

*7. Construction Management Statement and Environmental Management Plan, to include vermin control, temporary parking and turning. Pre-commencement (Based on Standard Condition C2).*

*8. Standard hours of construction and demolition.*

**GROUND INVESTIGATION**

*9. Development to be in accordance with the 'Overarching Archaeological Written Scheme of Investigation (Waterman, October 2019) (WSI). Site-specific Written Archaeological Scheme of Investigation to be submitted. Prior to commencement (except demolition above ground floor/basement slab level).*

*10. Land contamination scheme to include assessment, remediation and validation reporting prior to commencement (except demolition above ground floor/basement slab level).*

*11. Ground gas scheme to include assessment, remediation, and validation reporting prior to commencement (except demolition above ground floor/basement slab level).*

*12. Foundation design (groundwater) prior to commencement (except demolition above ground floor/basement slab level).*

**APPEARANCE**

*13. Details of materials to be submitted for approval prior to construction above ground level to be in accordance with principles set out in section 2.5 of Design and Access Statement. Development to be carried out in accordance. Metal 'fins' to façade to be provided prior to first occupation.*

*14. Signage Strategy for commercial frontages and entrances - submitted and implemented prior to occupation.*

*15. Reception area to Plot G be provided and retained as a three dimensional reception space in accordance with approved drawings [views through, character, activation etc]*

*16. A scheme to provide, maintain and manage an active frontage to the western façade of the ground floor and southern facade lower ground floor of Plot G at all times to be submitted prior to first occupation of the spaces within the building adjoining those facades.*

#### **LANDSCAPING**

*17. Landscaping to be in accordance with full landscaping details to be approved prior to commencement (except demolition) which shall be in accordance with the principles shown on the approved drawings. To include details of services, tree pit/planter details, plant establishment details, biodiversity enhancements and all hard landscaping.*

*All landscaped areas within Phase 2, which for the avoidance of doubt shall include the Pocket Park feature, and upper floor terraces, to be provided prior to first occupation of the building on Plot G, or in accordance with a timetable that shall have been agreed in writing by the LPA prior to first occupation of Plot G building. All planted materials shall be maintained for five years. (Based on Standard Condition L2).*

*18. Landscaping management plan to be approved prior to occupation (Based on Standard Condition L4)*

*19. No boundary treatment under Class A, Part 2, Schedule 3 GPDO 2015 (as amended) to be erected within the site except in accordance with details to be submitted for approval (except temporary hoarding during construction, or where expressly permitted).*

*20. Arboricultural Method Statement to be submitted prior to commencement of any works within Station Hill adopted Highway land (based on Standard Condition L7)*

*21. Provision of Garrard St bridge and associated steps down to Garrard St in accordance with approved plans and prior to first occupation of Plot G.*

#### **TRANSPORT**

*22. Vehicle Parking to be provided in accordance with approved details prior to first occupation of Plot G building. (Based on Standard Condition DC1)*

*23. Cycle Storage - to be provided in accordance with approved plans prior to first occupation of Plot G building. (Based on Standard Condition DC5)*

*24. Provision of approved vehicle accesses prior to first occupation (Based on Standard Condition DC3)*

*25. Existing Accesses to be closed and highway reinstated prior to first occupation (Based on Standard Condition DC10)*

*26. Electric Vehicle Charging Points. Scheme provided and implemented prior to occupation of Plot G.*

*27. Maintenance of visibility splays as per approved plans (based on Standard Condition DC13)*

*28. Delivery and Servicing Plan to include restricted hours - to manage safety, congestion and noise to be submitted prior to occupation of Plot G (based on Standard Condition DC22)*

*29. Any access barriers shall open away from the highway and be set back a distance of at least 11 metres from the nearside of the carriageway of the adjoining highway in accordance with drawing SHRN - CRL - S2 - P2 - DR- SK - 9212.*

#### *ENVIRONMENTAL*

*30. Wind tunnel testing and mitigation. Interim Mitigation Measures in ES to be provided prior to first occupation of Plot G or first use of any part of the Phase 2 public realm whichever is the sooner.*

*31. All Phase 2 floorspace to achieve BREEAM Excellent standard. Final BREEAM Certificate to be submitted for approval prior to first occupation.*

*32. Sustainable Drainage Strategy and associated detailed design, management and maintenance plan - Submission pre-commencement (except demolition above ground floor/basement slab level). Implementation in accordance. (SU7, SU8)*

*33. Foul drainage, surface drainage and water supply Capacity assessment, phasing or upgrade prior to first occupation [Thames Water]*

*34. Details of habitat mitigation works and timetable for provision for Plot G building including Bat, Peregrine Falcon, Redstart and Swift nesting and habitat. Implementation in accordance.*

*35. Updated bat survey in event that demolition not commenced within one year of permission.*

*36. No demolition or site clearance within a Plot shall take place within the bird nesting season except under Ecologist supervision.*

*37. Green/Brown roof to be provided to extent shown on drawings and in accordance with detailed specifications and habitat enhancement scheme to be submitted for approval prior to first occupation.*

*38. Refuse and recycling bin store(s) provided in accordance with approved details prior to occupation. (Based on Standard Condition DC8).*

*39. Details of measures to prevent pests and vermin accessing bin stores and other service areas within all buildings and structures within the site to be submitted for approval and implemented prior to occupation.*

*40. Details of proposed hours of use of all non-residential uses on the lower ground and ground floors of the building to be submitted for approval prior to first occupation. Operated as such thereafter.*

41. Details of external lighting for visual enhancement and safe functioning of each plot. Designed to minimise illuminance levels and to include dimming controls post-11pm and designed to avoid harm to amenity. For approval prior to first occupation (Based on Standard Condition N19)

42. Noise assessment of all proposed mechanical plant prior to installation. (Based on standard condition N2)

43. Implementation of submitted noise mitigation scheme (Based on standard condition N10)

44. Odour Risk Assessment for all flues, extraction and ventilation equipment prior to installation (based on Standard Condition N11).

45. No materials or green waste from demolition or construction to be burnt on site.

46. Noise assessment prior to any gym use including mitigation measures. Implementation in accordance.

47. Air Quality Assessment prior to commencement (except demolition and groundworks) to include 'canyon effect' modelling, up to date local weather data calibration of the model and measured local air quality. To include mitigation plan to offset any worsening identified. Implementation prior to first occupation. (adapted version of Standard Condition N15)

48. Development of each plot in accordance with the approved Flood Risk Assessment (FRA)

49. No uncontrolled infiltration of surface water drainage into the ground.

#### SECURITY

50. Security/Anti-Crime Management Plan to be submitted for approval prior to construction above ground level in accordance with the 'Secured by Design' standard.

51. Secured by Design accreditation. Prior to occupation.

#### SUBSEQUENT OPERATION

52. Scheme of environmental controls include switching off office lights and closing of blinds after 11pm.

53. Implementation of submitted Superfast Broadband Strategy dated December 2019 to include recommended physical measures to enable secondary internet provider connection, prior to first occupation or timetable to be agreed prior to occupation.

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#### Recommendation 2) 192032/HYB: PHASE 3:

Delegate to the Head of Planning, Development and Regulatory Services (HPDRS) to i) **GRANT** Outline Planning Permission in respect of Phase 3 subject to the satisfactory completion of the Section 106 agreement or ii) Refuse Outline planning permission if the

S106 agreement is not completed by 12 February 2021 (unless a later date is agreed by the HPDRS).

The S106 to include the following heads of terms:

### Phasing

- Not to implement any part of 190441/151427/130436 in conjunction with any part of 192032/HYB on land within 192032 site boundary.
- Not to practically complete Phase 3 prior to practical completion of Phase 2 public realm.

### Affordable Housing

#### On-site:

- 10% of all dwellings within each plot to be provided on-site as Affordable Housing.
- Tenure to be 70% with rent capped at LHA rate and 30% Intermediate.
- Where dwellings are provided as Build to Rent, the Affordable Housing rent to be capped at LHA rate.
- On-site residential to be provided as affordable into perpetuity
- Developer cannot occupy more than 75% of market units until on-site affordable dwellings have been transferred to a Registered Provider
- In the event developer cannot sell to an RP then appropriate payment in lieu to be agreed.
- AH Mix to reflect proportion of dwelling sizes and tenure types (market sale/BtR) within each Phase (by bedroom and floor area).
- In the event that another approved use is converted to a dwelling within a building approved under this permission a financial contribution equivalent to 15% of the GDV of each new dwelling shall be payable prior to first occupation of that dwelling.
- All Affordable units to be identified on plans to be submitted for approval concurrently with submission of application for Reserved Matters Approval. Implementation in accordance with approved plans. No future changes other than as agreed in writing by the LPA.

#### Deferred Payment:

- Up to 20% equivalent Affordable Housing subject to a deferred payment review mechanism.
- Re-assessment at Reserved Matters stage for the phases in Phase 3.
- 100 % application of surplus to the on-site delivery at this point.
- Submission of open-book viability appraisal in respect of Phase 3 residential plot, which uses actual costs incurred and actual achieved values.
- Open book to apply to all late stage and phase reviews.
- Incurred costs and achieved values to be supported by written evidence:

#### *Sales:*

*To include certified copy certificates showing the clear sales price, less incentives, plot and date - with purchasers' names redacted if necessary - or certified from a lawyer providing duty of care to the Council for the accuracy of the information provided.*

#### *Costs:*

*To include certified copy payment certificates or receipts (the latter being particularly relevant for professional fees) signed off by Employers Agent or*

*professional Quantity Surveyor owing a duty of care to the Council certifying expenditure of all properly incurred costs and relevant only to this development.*

- Where no actual data available for components of the scheme (e.g. un-let homes, un-sold uses or costs still to be incurred) independent professional best estimates to be used. The estimates to be based on the actual evidence of costs and values provided.
- For site-wide costs (e.g. those across both south and north sites) to be pro-rated based on proportion of GEA (sq m)
- Format of any submission to have regard to the pro-forma appraisal included at Annex 5 of the existing S.106, or such other appraisal model as may be agreed
- Costs and values to include profit and a fixed land value input to be agreed.
- Requirement for a re-assessment is triggered in the event that Phase 3 includes residential; (a) upon submission of Reserved Matters of Phase 3 and (b) again upon practical completion of Phase 3.
- In the event of disputes the normal dispute resolution procedures to apply.
- Developers profit threshold is 20% on total costs.
- 60% of any surplus profit over and above the threshold level is to be provided to the Council as an affordable housing contribution. Any additional affordable housing contribution generated as part of trigger (a) is to be provided as on-site affordable housing, provided this is practically feasible or as a financial contribution. Any additional affordable housing contribution generated as part of trigger (b) will be provided as a financial contribution.
- Any additional deferred contribution/housing as part of trigger (b) is paid to the Council upon occupation of 90% of residential homes, unless the residential homes are covenanted as BTR in which case the payment date will be the earlier of (i) an investment sale of the completed residential homes or (ii) 3 years from PC.
- Delegate to the Head of Planning Development and Regulatory Services in consultation with the Council's Valuer to agree further detailed terms/adjustments as required.

**Affordable Housing - Affordable Private Rent** *(only applies where Build to Rent tenure is proposed, which would be confirmed at Reserved Matters stage)*

- All Build to Rent units to be identified on plans to be submitted for approval concurrently with submission of application for Reserved Matters Approval. Implementation in accordance with approved plans.
- Build to Rent- Affordable Private Rent tenure. Number of APR units not to exceed the ratio of BtR to other dwellings within the scheme.
- Rents to be no higher than LHA (or last published LHA increased by CPI where LHA no longer exists).
- In the event of a change from Build to Rent tenure all affected Affordable units to become Social Rent or Affordable Rent tenure with rents set no higher than LHA (or last published LHA increased by CPI where LHA no longer exists). 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 to be agreed by the Council and not less than 50% of GDV shall be made to the Council to enable AH provision elsewhere in the Borough. On site AH retained in perpetuity.

## *Nominations and Lettings – Affordable Private Rent (within Build to Rent)*

### *First Lets:*

- Either a typical unit, show apartment or the marketing suite will be made available for viewings
- Three months before Practical Completion, the Council will be notified of expected date units will be available.
- The “Marketing Period” will start two months before Practical completion and the Landlord will provide information on rents, specification, floor plans and management details.
- For the first 4 weeks of the Marketing Period the affordable homes will be exclusively marketed to Council nominees, and the following will apply:
- The Council has 10 working days to advertise the properties. This includes arranging viewing days for Applicants;
- The Council then has 5 working days to confirm eligibility of the Applicants against the ‘Qualifying Criteria’ and then nominate those Applicants to the Landlord;
- Subject to appropriate checks by the Landlord that the Qualifying Criteria has been met, Applicants will then have 2 working days to confirm if they wish to take the property.
- If the Landlord considers that the Qualifying Criteria has not been met, they will notify the Council who will be granted an additional 2 working days to nominate an alternative Applicant for this particular property.
- Where more than one Applicant wants the same property, priority will be as per the following Priority Hierarchy:
  1. Households on the Council’s Housing Waiting List
  2. Households where at least one person both lives and works in the Borough
  3. Households where at least one person either lives or works in the Borough
  4. Households where at least one person lives or works in a neighbouring local authority
- After the initial 4-week period, any remaining available affordable homes can be marketed by both the Council and the Landlord.
- Within this period the Council may still nominate Applicants, however priority will be determined on a first come first served basis, subject to the Qualifying Criteria being met.

### *Subsequent Lets:*

- Existing residents will provide 2 months’ notice of their intention to activate a break clause, at which point the property can be marketed.
- As above, for the first 4 weeks of any marketing period for subsequent lets of the affordable homes will be ring fenced to Council nominees.

### *Qualifying Criteria for all Affordable Private Rent Dwellings (within Build to Rent)*

1. Can afford the rents proposed [affordability to include money provided through the benefits system]
2. Are an appropriate household size for the available property (to be defined in the agreement)
3. Suitable references & credit checks (to be defined in the agreement)



4. Have no rent arrears or history of rent arrears
5. No history of anti-social behaviour (to be defined in the agreement)
6. Satisfactory face-to-face interview with the Landlord's representative (to be defined in the agreement).

*Priority Hierarchy:*

1. Households on the Council's Housing Waiting List
2. Households where at least one person both lives and works in the Borough (to be defined in the agreement)
3. Households where at least one person either lives or works in the Borough
4. Households where at least one person lives or works in a neighbouring local authority.

*Affordable Private Rent Management Strategy:*

3 months before Practical Completion the Landlord to submit a Management Strategy to the Council for approval to include the following:

- Details of the individual weekly rent and service charge (noting that all rents are inclusive of service charges)
- Management, maintenance and servicing arrangements for the affordable units/occupiers (e.g. on-site presence hours, bin disposal, visitor parking etc)
- Details as to how the affordable homes will be marketed to prospective occupiers (for both first and subsequent lettings) and the different forms of media proposed to be used.
- No dwelling to be occupied in any part of the development until the Strategy has been approved in writing by the Council. No dwelling to be occupied other than in accordance with the approved Strategy.

*Sale or Transfer of Affordable Private Rent Units or Conversion to Other Tenures:*

- The Affordable Housing Units to be offered within one (1) month of the sale/transfer on leases of at least 125 years to a Registered Provider to be approved by the Council. such offer to be at no more than the Affordable Housing Market Valuation and to be open for acceptance for three months from the date of the offer.
- If after three months no Registered Provider has acquired the Affordable Housing Units the Council shall be entitled to acquire the Affordable Housing units. 6 weeks to notify intention and 2 months to complete transaction.
- In the event that the Affordable Housing Units are not let to Registered Provider or the Council. To pay a contribution to the Council to allow an equivalent provision of Affordable Housing elsewhere in the Borough, to be agreed with the Council but not

less than 50% of the GDV of the unit, payable within 10 working days of the amount being agreed.

- The Owner to submit an annual statement to the Council with such evidence as is reasonably required by the Council to confirm that the Owner is complying with the management requirements of the agreement in respect of Affordable Private Rent units.

*General Build to Rent Provisions (all tenures):*

- To identify all BtR dwellings and associated areas concurrently with submission of Reserved Matters.
- BtR to be secured in single ownership (per building) for minimum 20 years from date of Practical Completion.
- 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)
- 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.
- Single management company (per building plot). Council to be notified of details.
- To provide and maintain all Communal Facilities as identified on plans to be annexed to the agreement. Right of access to Communal Facilities, including charges and terms of use to be the same for all residents regardless of tenure.
- Service charges to be set at such a level as to cover the costs of services to which charge relates and no more.
- At the end of the Build to Rent Covenant Period to continue to provide and manage the Communal Facilities unless alternative amenity facilities of equivalent effect and a timetable for their provision and arrangements for their management have been agreed in writing by the Local Planning Authority.
- 'BTR Clawback' - In the event that the owner of a build to rent development sells or otherwise transfers some or all of the units so that they no longer qualify as build to rent under some agreed variation to the terms of this agreement, the developer shall provide a valuation of the Build to Rent accommodation immediately prior to the sale/transfer and a valuation of the value following the change to non-Build to Rent. A financial contribution equal to 30% of the increase in value shall be paid to the Council within 3 months of sale/transfer.

**Public Art and Cultural Strategy**

- A Public Art, Culture and Community scheme to the value of £500,000, or default contribution of £500k in the event that a scheme is not agreed within 12 months of

submission. To be submitted on implementation of Phase 3 to include artistic lighting, integration with Abbey Quarter, landscaping, street furniture and children's play features, reasonable fees in preparing/agreeing strategy (up to 10%).

- Space equivalent to existing Biscuit Tin container unit to be identified within Phase 3 land at Reserved to be provided prior to removal of container unit - or timetable to be agreed - provided to the Council for 15 years on a peppercorn rent.

### Transport and Highways

- To enter into s278/s38 Agreement to provide Highway Improvements located within the Phase 2 site (to be identified on a plan to be annexed to the agreement). To include a timetable for their provision but not later than first occupation of any building within the Phase 2 site, unless otherwise agreed in writing by the LPA.
- Interim Cycleway Scheme to Greyfriars Road in accordance with submitted drawing 44470-5502-TA-01c and works/costings schedule set out in Cast Consultancy document dated 15 December 2020 [to be annexed to the agreement] , to be provided prior to first occupation of any part of Phase 2 or in accordance with a timetable that shall have been agreed in writing by the LPA prior to first occupation, and maintained as approved at all times thereafter.
- £200,000 contribution payable on commencement of Phase 2 to be spent on improvements to the station underpass.
- £5,000 contribution towards Traffic Regulation Order associated with securing Highway Improvements on all roads surrounding the site.
- Not to position commercial or residential waste bins within the public highway or Public Realm Areas and to ensure that the collection of commercial and residential waste is carried out from within the service areas within the development.
- A Travel Plan for Phase 3 including a phased timetable for implementation to be prepared and submitted to the Council for approval prior to first occupation. Implementation in accordance.
- Car parking management - strategy to be agreed in respect of use by non-occupiers.
- To enter into s278/s38 Agreement to provide Highway Improvements located within the Phase 3 site (to be identified on a plan to be annexed to the agreement). To include a timetable for their provision but not later than first occupation of any building within the Phase 3 site, unless otherwise agreed in writing by the LPA.
- To enter into S278 Agreement to provide off-site Highway improvements to Greyfriars Rd, Station Hill and Garrard St to include a timetable for provision and as identified on a plan to be annexed to the agreement.
- To procure two Car Club cars to serve the development for a minimum period of 5 years. To be made available to all occupiers of the development prior to first occupation.
- To submit a Car Club Strategy for approval for the Phase 3 Site within six (6) months of Implementation of any Development within the Phase 3 Site.

- To provide and maintain within each Plot rapid electrical charging facilities for use in connection with the Car Club in accordance with the Approved Car Club Strategy.

#### **Public Realm**

- To permit public pedestrian and cycle access 24 hours per day to the Public Realm Areas within Phase 3 following Practical Completion of the Public Realm Areas. Except for emergency and maintenance reasons (to be specified in the agreement).
- Provision and ongoing maintenance of public (Accessible) lifts prior to Practical Completion of the Public Realm Areas. 24 public access to be maintained.
- To maintain the Public Realm Areas to at least the standards reasonably required by the Council.
- To pay the sum of £20,000 towards the relocation and or provision of interpretation and wayfinding signage reasonably required for improved interpretation of, and enhanced accessibility to, the Abbey Quarter prior to first occupation of any building in Phase 3. [Policies EN6, CR15]

#### **Employment Skills and Training Plan**

- The production, implementation and monitoring of an Employment and Skills Plan (ESP) for each phase of development for the Construction and End User stages of the development to include a timetable for implementation:
- Construction ESP to have prior written agreement by the Council/Reading UK CIC no later than three months prior to the commencement of the first phase of the development and thereafter two months prior to commencement of each subsequent phase.
- End User ESP to have prior written agreement by the Council/Reading UK CIC no later than three months prior to the first occupation of any non-residential floorspace within each phase of the development.
- To implement in accordance with approved ESP and timetable.
- In the event that the developer chooses not to provide any part of the ESP themselves then the following will be sought in lieu of the related plan:

*Construction Stage:* A commuted sum for each phase within Phase 3, calculated using the SPD formula:  $\text{£2,500} \times \text{Gross internal floor area of scheme (m}^2\text{)} / 1000\text{m}^2$ , payable 3 months prior to the commencement of the phase to which it relates.

*End User Stage:* A commuted sum calculated using the Employment Skills and Training SPD formula:  $\text{Gross Internal Area of relevant Non-residential Floorspace(m}^2\text{)} / \text{average employee density for development type} \times \text{target percentage of jobs filled by Reading residents (50\%)} \times \text{percentage without Level 2 skills (30\%)} \times \text{£1,500}$ .

- ESP Monitoring fees as per SPD.

## **CCTV**

- No Building on each Plot in the Development shall be Occupied until a CCTV Scheme for that Building and adjacent Public Realm has been submitted and approved by the Council and the apparatus referred to in the Approved CCTV Scheme for that Building and Public Realm has been installed and is operational.
- The CCTV scheme to accord with Council and Thames Valley Police requirements for such a system, be compatible with the Council's/Police CCTV system; be linked into the CCTV system operating in the central area of Reading; and provide for connection to and control by the Council's town centre CCTV system.
- To be retained and maintained in accordance with the Scheme at all times thereafter.

## **Zero Carbon Offset - All Dwellings**

- Zero Carbon Offset as per SPD 2019 a minimum of 35% improvement in regulated emissions over the Target Emissions Rate in the 2013 Building Regulations, plus a Section 106 contribution of £1,800 per remaining tonne towards carbon offsetting within the Borough (calculated as £60/tonne over a 30-year period).
- As-built SAP calculation for all dwellings to be submitted for approval within 6 months following first occupation.
- Contribution based on SPD formula below towards carbon-saving projects calculated for all dwellings based on approved SAP calculation to be paid to the Council within 9 months following first occupation:  
TER CO2 m2/yr less 35% CO2 m2/yr) = 65% of TER  
65% of TER x total square metres = total excess CO2 emissions annually  
Total excess CO2 emissions annually x £1800 = S106 contribution.

## **Public Toilets**

- A scheme for the provision of public toilets, or suitable public access to commercial toilets, within Phase 3 to be submitted to the Council for approval prior to first occupation of any building within Phase 3, unless otherwise agreed in writing with the Local Planning Authority. Implementation in accordance.

## **Decentralised Energy (Phase 3)**

- To provide Phase 3 decentralised energy system in accordance with a timetable and full details and specifications to be submitted prior to Phase 3 construction works to be in accordance with submitted Energy Strategy. System to be heated by Ground Source Heat Pump unless a feasibility study demonstrates that an open or closed loop ground source heat pump is not technically possible, with reference to the Sustainable Design and Construction SPD 2019. To include details of provision for connection to District Heating network(s) beyond the site boundary, including capped-off pipework and space in plant rooms.
- The Phase 3 heat pumps shall use available waste heat from Phase 2 as the first heat source. Phase 3 shall contain sufficient thermal storage to ensure that on all days the cooling heat rejection from Phase 2 is larger than the heat demand of Phase 3 all the waste heat available from Phase 2 can be utilised. Acceptable thermal storage can be either the ground / aquifer or a hot water store.

- To export excess heat/cooling from Phase 2 and 3 combined to any heat network in surrounding area.

#### **C1 Hotel Use:**

- To submit a Scheme for approval for the number and layout of any Class C1 floorspace to include the number and layout of all bedrooms, (min.5% to be wheelchair accessible), ancillary functions, public areas concurrently with the submission of Reserved Matters.
- Hotel (Class C1) only and for no other purpose (including any other purpose in the same Use Class of the Schedule to the Town & Country Planning (Use Classes) Order 1987 (as amended), or in any provision equivalent to that Class in any statutory instrument revoking or re-enacting that Order with or without modification - (for example as serviced apartments (Class C1), self-contained residential units (Class C3), small/large houses in multiple occupation (Class C4 or Sui Generis)).
- Not to let or licence for occupation or permit or suffer occupation of any of the rooms for a continuous period of more than 3 months to the same occupier or occupiers other than those Customers staying in accordance with the above, not to let or licence for occupation or permit or suffer occupation of any room for a continuous period for more than 3 months to the same Customer or Customers.
- Not to require Customers of any room to agree to any minimum period of occupation (of whatever duration).
- To provide to the Council within 14 days of written request evidence regarding the use or occupation of the rooms.

#### **C2 Residential Institution Use**

- A scheme prescribing the nature of the C2 use including the type and amount of care provided, the range of communal facilities and ancillary functions provided and the number of bedspaces/occupiers to be submitted to LPA for approval prior to first occupation of any C2 use. Implementation in accordance.
- To provide to the Council within 14 days of written request evidence regarding the ongoing use or occupation of the accommodation. [Policy H6]

#### **Monitoring/ legal**

- Contribution towards monitoring costs of £21,500 (index-linked from date of permission 130436/OUT) plus a separate commitment to pay the Council's reasonable legal costs in connection with the proposed S106 Agreements will be payable whether or not the Agreement is completed. [total for both Phases]
- To notify the Council prior to the change of use of any floorspace at any time.

In accordance with Policy CC9.

#### **Repayment of unpaid monies**

Any unexpended contributions to be repaid within ten years beginning with the start of the Financial Year after the final (including phased contributions) obligation payment for each obligation is received. In accordance with policies CC9.

## Indexation

All financial contributions to be index-linked from date of permission unless expressly stated otherwise.

**And subject to conditions**, to include (numbering continues from Full permission section above):

*(First condition)*: 54. Development in accordance with Reserved Matters to be submitted for approval. Access, Scale, Layout (including internal layout of all buildings and location and extent of all residential amenity areas), Appearance, Landscaping (full landscaping details to be submitted).

55. Applications for Approval of Reserved Matters to be made not later 3 years from date of this Outline permission.

56. The development hereby permitted shall be commenced no later than either:-  
a) the expiration of three years from the date of this permission; or  
b) the expiration of two years from the date of approval of the last reserved matters to be approved under the terms of this permission, whichever is the later.

57. All applications for approval of Reserved Matters shall be in accordance with the submitted Design Codes and Parameter Plans and in general accordance with Design and Access Statement.

58. Development to be carried out in accordance with the approved Parameter Plans and Design Codes and all Reserved Matters approved under Condition 1, and all other details as may be approved under these conditions, and conditions pursuant to the approval of the Reserved Matters.

59. The total amount of development permitted (Gross External Area) shall not exceed 128,000 [one hundred and twenty eight thousand] square metres floorspace (GEA).

60. Subject to the overall maximum set by Condition 6, the maximum amount of development for each use shall not exceed:

Office (Class B1a) 86,500 [eighty six thousand, five hundred] square metres GEA  
Residential Dwellings (Class C3) 750 [seven hundred and fifty] dwellings and 65,000 [sixty five thousand] square metres floorspace GEA.

Residential Institutions (Class C2) 26,000 [twenty six thousand] square metres GEA.

Hotel (Class C1) 26,000 [twenty six thousand] square metres floorspace GEA.

Flexible Retail Office and Leisure (A1, or A2, or A3, or A4, or A5, or B1, or D1 or D2), maximum 4,500 [four thousand five hundred square metres] GEA.

Podium and Basement 23,000 [twenty three thousand] square metres GEA.

61. A minimum of 1,000 [one thousand] square metres GEA Retail or Leisure uses shall provided at ground floor or lower ground floor level.

62. Detailed phasing plan for all plots and associated public realm and landscaped areas to be submitted for approval prior to commencement of any development on Phase 3 (except demolition).

63. Details of the residential numbers, mix, size of units and tenure for each plot to be submitted concurrently with reserved matters.

64. No change of use from any permitted use to a dwelling shall take place without the further grant of planning permission from the LPA.

65. No use of dwellings as Class C4 HMO.

#### CONSTRUCTION/DEMOLITION PHASE

66. Site clearance (bird nesting)

67. Demolition Management Statement and Environmental Management Plan, to include vermin control, temporary parking and turning. Pre-commencement.

68. Construction Management Statement and Environmental Management Plan, to include vermin control, temporary parking and turning. Pre-commencement (Based on Standard Condition C2).

69. Standard Hours of construction/demolition.

#### GROUND INVESTIGATION

70. Development to be in accordance with the 'Overarching Archaeological Written Scheme of Investigation (Waterman, October 2019) (WSI),

71. Site-specific Written Archaeological Scheme of Investigation for each Plot to be submitted prior to commencement of each Plot (except above ground demolition) (WSI)

72. Land contamination scheme. Assessment, Remediation, Validation. Pre-commencement. (Based on Standard Conditions CO3, CO4, CO5, CO6)

73. Ground gas monitoring scheme. Assessment, Remediation, Validation. Pre-commencement (except demolition).

74. Foundation design (groundwater). Pre-commencement (except demolition).

#### APPEARANCE

75. i) Details and samples of the types of materials for approval concurrently with Reserved Matters

ii) Full details of the materials to be submitted prior to commencement (except demolition and works below existing ground level).

76. Details of building maintenance and cleaning systems in respect of each Plot concurrently with Reserved Matters.

77. The Reserved Matters for Plots A and B (in respect of Layout, Scale and Appearance) shall include a 2 metre 'shoulder' set-back to all floors of the building(s) above 84m AOD (to the nearest complete floor) within the western façade fronting Greyfriars Road except where those floors already exceed 7 metres distance from the existing highway kerb line.

#### LANDSCAPING



78. All hard and soft landscaping works to be carried out prior to first occupation (or agreed timetable) in accordance with approved details including Reserved Matters approvals and approved Phasing Plan. All planted materials shall be maintained for five years.

79. Landscaping management plan to be submitted for approval prior to first occupation of any Plot. (Based on Standard Condition L4).

80. No boundary treatment under Class A, Part 2, Schedule 3 GPDO 2015 (as amended) to be erected within the site except in accordance with details to be submitted for approval (except temporary hoarding during construction, or where expressly permitted).

81. Arboricultural Method Statement to be submitted prior to commencement of any works within Station Hill adopted Highway land. (Based on Standard Condition L7)

#### TRANSPORT

82. Provision of car and cycle parking spaces in accordance with approved layout prior to occupation of plot to which they relate - or in accordance with submitted timetable.

83. Provision of vehicle accesses prior to occupation of Plot to which they relate - or submitted timetable.

84. Parking permits - addresses - Prior to first occupation. (based on Standard Condition DC20).

85. Parking permits - information - Prior to first occupation. (based on Standard Condition DC21).

86. Provision of cycle wheeling ramp to steps between Phase 3 and Greyfriars Road and Phase 3 and Garrard Street - Details to be submitted concurrent with Reserved Matters.

87. Allocation of car parking spaces. Details prior to first occupation.

88. Electric Vehicle Charging Points. Prior to first occupation.

89. Any barriered access provided shall not open towards the highway and shall be set back a distance of at least 21.4 metres from the nearside of the carriageway of the adjoining highway in accordance with drawing 44470/5502/SK041.

90. Any vehicle access located on Greyfriars Road shall be provided with two lanes prior to first use and retained as a point of access only shall not be used as a means of exiting the site, in accordance with drawing 44470/5502/SK041 hereby approved.

91. Existing Accesses to be closed and highway reinstated (Based on Standard Condition DC10)

#### ENVIRONMENTAL

92. Sustainable Drainage Strategy (pre-commencement except demolition).

93. Foul drainage, surface drainage and water supply Capacity assessment, phasing or upgrade prior to first occupation for each Plot [Thames Water].

94. Wind tunnel testing concurrently with the submission of Reserved Matters for each Plot including mitigation. Implementation prior to first use.
95. Solar Glare assessment and mitigation (and timetable for provision) to be submitted concurrently with Reserved Matters. Implementation in accordance.
96. Daylight assessment and mitigation (and timetable for provision) to be submitted concurrently with Reserved Matters. Implementation in accordance.
97. All Phase 3 floorspace except Class C3 dwellings to achieve BREEAM Excellent standard. Final BREEAM Certificate for approval prior to occupation.
98. All dwellings to be built to the higher water efficiency standard under Regulation 36(3) of the 2015 Building Regulations.
99. Details of habitat mitigation works and timetable for provision for each Plot building including Bat, Peregrine Falcon, Redstart and Swift nesting and habitat; Green and Brown Roofs (min. 25% roof area of each Plot) and details of ground level planting. Submitted concurrently with Reserved Matters. Implementation in accordance.
100. No uncontrolled infiltration of surface water drainage.
101. Noise assessment & mitigation for residential (to be submitted and provided prior to first occupation) (based on Standard Condition N9).
102. Noise assessment of all proposed mechanical plant prior to installation (provision in accordance) (based on Standard Condition N2)
103. Odour Risk Assessment for all flues, extraction and ventilation equipment. Provision in accordance (Based on Standard Condition N11)
104. Service vehicle hours/waste management. Details to be submitted.
105. Details of proposed hours of use of all non-residential uses on the lower ground and ground floors of each plot buildings to be submitted for approval prior to first occupation. Operated as such thereafter.
106. Details of external lighting for visual enhancement and safe functioning of each plot. Designed to minimise illuminance levels and to include dimming controls post-11pm and designed to avoid harm to amenity. For approval prior to first occupation (Based on Standard Condition N19).
107. Details of refuse and recycling bin stores to be submitted to include vermin control measures.
108. Noise assessment prior to any gym use including mitigation measures. Implementation in accordance.
109. Air quality mitigation measures for occupiers of approved dwellings - Ventilation etc. (based on Standard Condition N13)
110. No development shall commence on site (except demolition and groundworks) until an Air Quality Assessment has been submitted to include 'canyon effect' modelling, up to date

local weather data calibration of the model and measured local air quality. To include mitigation plan to offset any worsening identified. Implementation prior to first occupation.

#### RESIDENTIAL AMENITY

111. Provision of all approved private amenity areas (including balconies) and approved communal amenity areas prior to first occupation.

112. (i) All dwellings shall be accessible and adaptable in line with M4(2) of the Building Regulations, unless built in line with M4(3) (ii) at least 5% of dwellings shall be wheelchair user dwellings in line with M4(3)

#### SECURITY

113. Security/Anti-Crime Management Plan to be submitted for approval prior to construction above ground level in accordance with the 'Secured By Design' standard - implementation in accordance.

114. No residential floorspace shall be first occupied until evidence of residential Secured By Design accreditation has been submitted to and receipted in writing by the Local Planning Authority, unless the Local Planning Authority agrees in writing to an alternative timetable for submission prior to first occupation of any part of the development

#### SUBSEQUENT OPERATION

115. Scheme of environmental controls include switching off of office lights and closing of blinds after 11pm on south facing facades.

116. Implementation of submitted Superfast Broadband Strategy dated December 2019 to include recommended physical measures to enable secondary internet provider connection, prior to first occupation or timetable to be agreed prior to occupation.

#### **Recommendation 3) 200822/NMA PLOT F:**

Agree Non-Material Amendment to permitted application 190466 subject to the following new/amended conditions:

- Approved Drawings and Details
- NMA not to be implemented prior to implementation of development permitted under 192032/HYB. A scheme and timetable of works associated with provision of bridge over, and steps down to, Garrard Street in conjunction with works permitted under 192032/HYB to be submitted for approval prior to commencement above existing ground level. Works in accordance with approved scheme and timetable.

#### **Recommendation 4) 200823/NMA - Plot E:**

Agree Non-Material Amendment to permitted application 190465 subject to the following new/amended conditions:

- Approved Drawings and Details
- NMA not to be implemented prior to implementation of development permitted under 192032/HYB. A scheme and timetable of works associated with provision of bridge over, and steps down to, Garrard Street in conjunction with works permitted

under 192032/HYB to be submitted for approval prior to commencement above existing ground level. Works in accordance with approved scheme and timetable.

**Recommendation 5) Deed of Variation to S106 under Permissions 190441/VAR and 190442/VAR**

Agree Deed of Variation with the following Heads of Terms:

Schedule 2 under 'Build to Rent':

- **Insert new text as follows:** In the event that the owner of a build to rent development sells or otherwise transfers some or all of the units so that they no longer qualify as build to rent under some agreed variation to the terms of this agreement, including agreement pursuant to paragraph 15 of this Agreement, the developer shall provide a valuation of the relevant Build to Rent accommodation immediately prior to the sale/transfer and a valuation of the value following the change to non-Build to Rent. A financial contribution equal to 30% of the increase in value shall be paid to the Council within 3 months of sale/transfer.

**Paragraph 15**

*Current wording.*

15. *To operate and manage the Market Housing Units constructed within Plot E and Plot F on the basis of Build to Rent and in accordance with paragraphs 16 to 22 of this Second Schedule for at least 20 years from Practical Completion of the Market Housing Units (the "Build to Rent Covenant Period"). Following the expiry of the Build to Rent Covenant Period, the obligations set out in this paragraph 15 and paragraphs 16 to 23 below shall cease to have further effect.*

*New wording:*

15. To operate and manage the Market Housing Units constructed within Plot E and Plot F on the basis of Build to Rent and in accordance with paragraphs 16 to 22 of this Second Schedule for at least 20 years from Practical Completion of the Market Housing Units (the "Build to Rent Covenant Period") unless otherwise agreed in writing by the Local Planning Authority. Following the expiry of 20 years from Practical Completion of the Market Housing Units, the obligations set out in this paragraph 15 and paragraphs 16 to 23 below shall cease to have further effect.

**Paragraphs 20 and 21:**

*Current Wording*

20. *All tenancies for Plot F shall include provisions enabling residents to have the right to access and use the Communal Facilities within both Plot E and Plot F subject to reasonable management requirements and for the avoidance of doubt the charges and other terms of use shall be the same for all residents (regardless of tenure).*
21. *All tenancies for Plot E shall include provisions enabling residents to have the right to access and use the Communal Facilities within Plot E subject to reasonable management requirements and for the avoidance of doubt the charges and other terms of use shall be the same for all residents (regardless of tenure).*

**New Wording:**

20. All tenancies, and title documents, for Plot F shall include provisions enabling all residents to have the right to access and use the Communal Facilities within both Plot E and Plot F subject to reasonable management requirements and for the avoidance of doubt the charges and other terms of use shall be the same for all residents (regardless of tenure).
21. All tenancies, and title documents, for Plot E shall include provisions enabling all residents to have the right to access and use the Communal Facilities within Plot E subject to reasonable management requirements and for the avoidance of doubt the charges and other terms of use shall be the same for all residents (regardless of tenure).

**Paragraph 24:**

*Current Wording*

- 24: *At the end of the Build to Rent Covenant Period to continue to provide and manage the Communal Facilities unless alternative amenity facilities of equivalent effect and a timetable for their provision and arrangements for their management have been agreed in writing by the Local Planning Authority.*

**New Wording:**

24. To provide and manage the Communal Facilities in perpetuity. Except where alternative amenity facilities of equivalent effect and a timetable for their provision and arrangements for their management have been agreed in writing by the Local Planning Authority AND no earlier than the expiration of 20 years from Practical Completion of the Market Housing Units.

**Delegate to the Head of Legal Services and Head of Planning Development and Regulatory Services to make such changes or additions to the conditions and obligations as may reasonably be required in order to complete/issue any of the above permissions/approvals.**

**Informatives (all applications):**

To include:

Positive and Proactive

Parking Permits

Building Control

## **1. INTRODUCTION**

### *Site description*

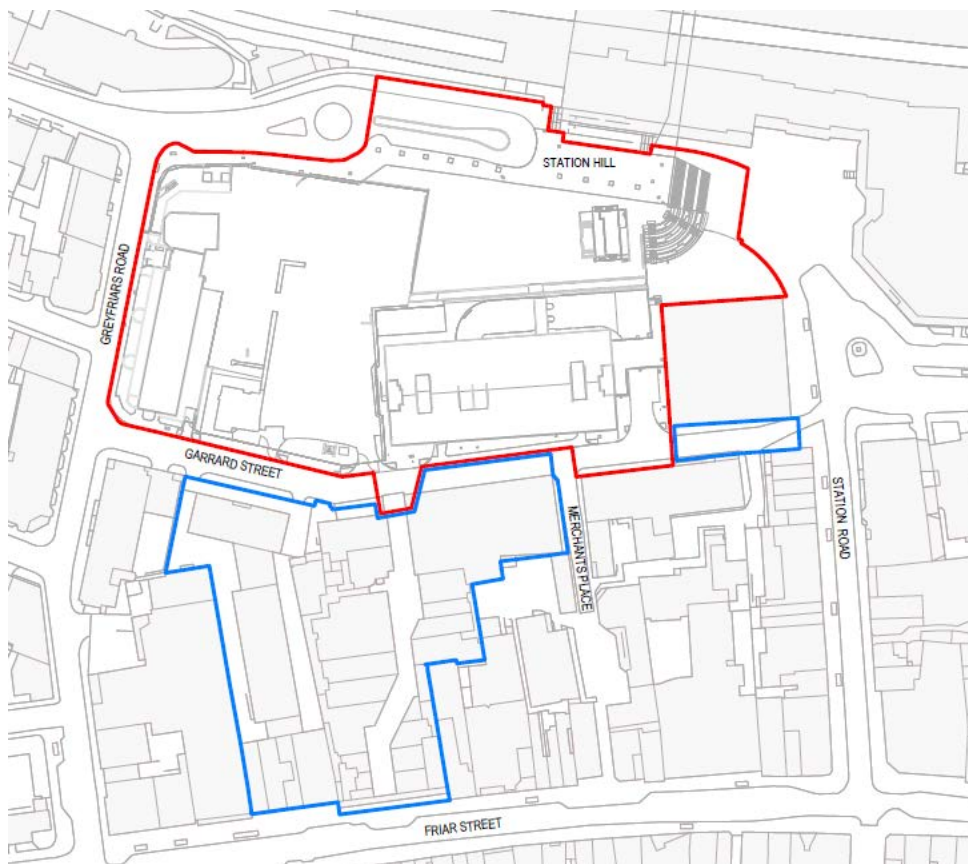
- 1.1 The entire Station Hill site is approximately 2.56 hectares and lies between the railway station in the north and Friar Street to the south. The wider site has been the subject of a number of applications and two of these have progressed to secure outline permission for different mixed-use approaches to developing the site. The most relevant permissions are those which are extant and begin with a suite of permissions known collectively as 'Station Hill 3' under ref. 130436, (as amended by 151426 and 151427). These were subsequently amended in 2019/20 by s.73 outline

permissions 190441 and 190442 to allow an increase in the number of dwellings on Plots E and F (to 538) with changes to the layout of the site. Reserved matters approvals 190465 and 190466 provided detailed residential-led proposals for Plots E and F, known as the 'South Site'. The expectation is that proposals for the part of the site north of Garrard St (the 'North Site') would come forward separately. This is the aim of the current applications, which are the subject of this report.

- 1.2 The buildings within the site comprise Xafinity House office building on Greyfriars Road which is now disused. The multi-storey car park (Garrard Street NCP) is still in use at the time of writing. The former Friars Walk Shopping Centre and Telecom House lie to the south of the current site but form part of the wider Station Hill site allocation and have now been demolished (under Prior Approval). The former long-distance coach station, the Mecca bingo hall; offices at Western Tower; and the walkway links to Friars Walk and Thames Tower have previously been demolished under extant permission 130436/OUT.
- 1.3 There are several Grade II listed structures surrounding the site: the former station ticket office (the Three Guineas pub, recently refurbished); the statue of Edward VII on the Station Approach roundabout; and Great Western House on Station Road (the Malmaison hotel/restaurant). The site is not within or adjacent to a conservation area, the nearest being the Market Place/London Street Conservation Area, to the south-east.
- 1.4 The topography of the 'north site' is broadly at two levels. The western section sitting at around 40 metres above sea level (Above Ordnance Datum) sloping upward (in the case of Garrard St) or stepping (in the case of the Station square) up to around 44 metres towards the eastern end. The western end lies at the low point of Greyfriars Road whereas the western end is markedly higher at the level of Station Road/Station Approach. Areas of made ground and podium structures exist between the two levels.
- 1.5 The site is entirely in Flood Zone 1 (lowest risk classification), Flood Zone 2 extends close to the site at the junction of Greyfriars Road and Garrard Street.
- 1.6 The site as a whole is covered by development plan policies including a specific site allocation policy in the Local Plan 2019. This is expanded upon in Supplementary Planning documents including the 'Station Hill South Planning and Urban Design Brief' (2007), and the 'Reading Station Area Framework' (2010), which the 2019 Plan confirms remain extant.



View south east from Station Hill towards site. Xaffinity House (right), Garrard St car park (centre), Thames Tower (left), Reading Station (far left).



*Location plan 192032 - Red outline to application site. Blue outline land also owned by the Applicant (extract from submitted location plan).*

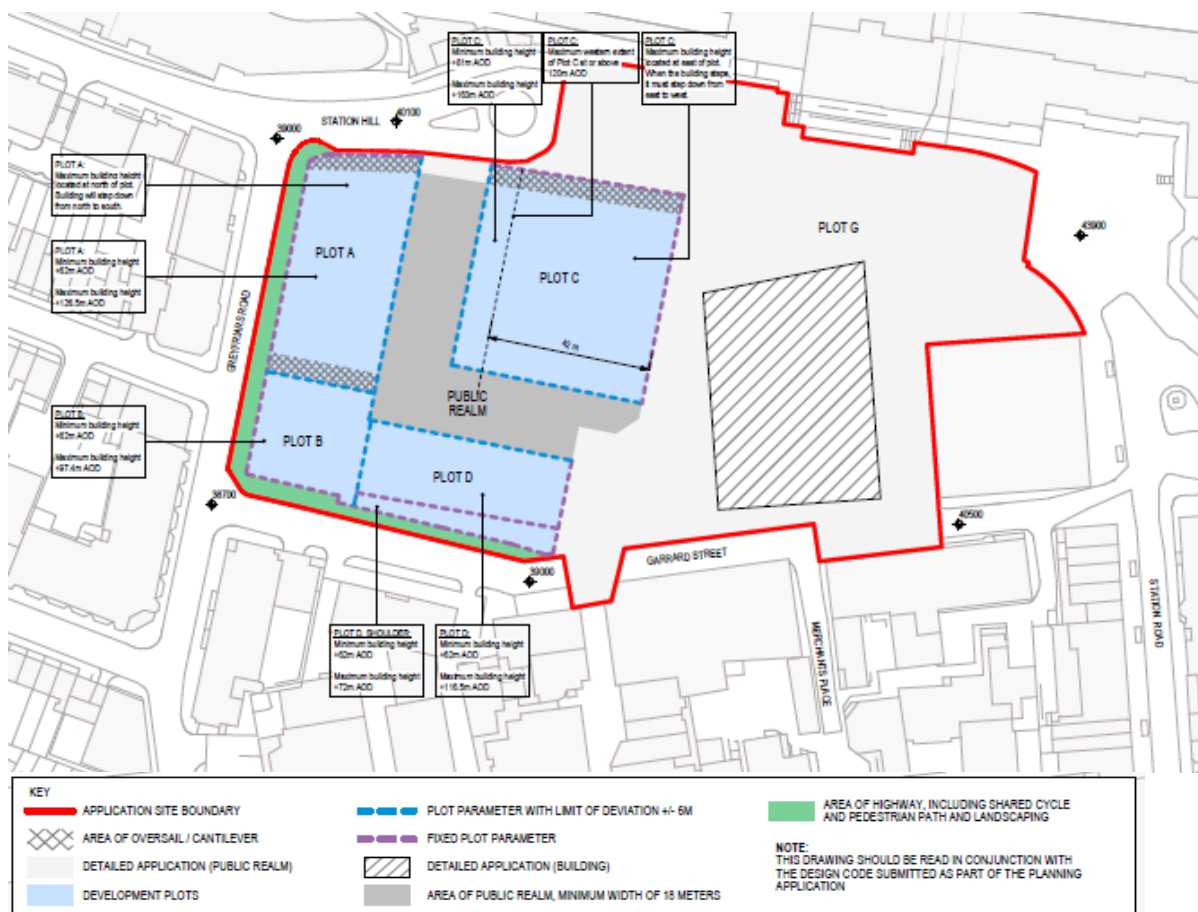
## 2. PROPOSALS

- 2.1 The proposed scheme is presented as a continuation of the permissions secured earlier in 2020 with the varied 'South Site' (Phase 1) scheme consisting of commercial units fronting onto a level (rather than sloping) Friars Walk public realm with a Build-to Rent residential scheme on the upper floors. The proposals mark a significant change in layout, scale and general nature to the previous (SH3) permissions for the North Site.
- 2.2 The proposal is submitted as a 'Hybrid' application with the site divided into a further two phases for the North Site. Full Planning Permission is sought for Phase 2 at the eastern part of the site with Outline permission sought (with all Matters reserved) for Phase 3 at the western part of the site. Proposals include demolition of Garrard Street Car Park and its replacement with an office building rising to 17 storeys above podium/Station Square level, or 18 storeys above Garrard St level (122m AOD at the tallest point of the rooftop plant enclosure rising to 125m AOD to top of building maintenance unit). Lower ground floor and mezzanine storeys extend downwards from podium level to meet Garrard Street level. The building rises to its full height across much of its footprint before stepping down to 16 storeys (110.2mAOD) for a short section at a point approximately 14 metres from the Garrard Street façade and then again to 9 storeys (81.9m AOD) at a point approximately 7 metres from the Garrard Street facade.
- 2.3 The northern façade of Plot G features a recess at ground, first and second floor levels to provide an open covered area beneath the upper floors and continues upwards in a series of three stepped sections.
- 2.4 The Plot G building is proposed to be largely clad in glass with vertical metal fins projecting at right angles to the façade to provide shading, reduce glare and add visual interest. A two-storey reception lobby space is proposed to the northern side of the building, linking through to a secondary entrance at Garrard Street level.
- 2.5 Vehicular access to a two-storey car park below the podium deck would be via a new entrance to Garrard Street beneath the new bridge. A temporary ramp would provide access between the two levels at the western edge of the podium until such time as the podium extends into Phase 3. The Phase 2 car park provides 70 parking spaces.
- 2.6 The proposed podium deck forms an area of public realm extending from Friars Walk by way of a bridge across Garrard Street and leading to a podium deck with a public square and beyond to the Station Square. It is proposed to extend the podium beyond the existing curved steps towards the existing taxi rank and station underpass on Station Hill, this will create a larger area of public realm while allowing a substantial area of below-podium basement to serve the development. The change in levels on Station Hill will be treated with a sloped 'Pocket Park' incorporating steps and paths. The public realm would also extend eastwards to the front (north) of Thames Tower.
- 2.7 Access for wheelchairs, pushchairs, etc is proposed via the existing 'switchback ramp' adjacent to the Station building and a new passenger lift located at the western end of the Phase 2 podium.
- 2.8 Phase 3 is submitted in Outline with all matters reserved. Permission is sought for a 'flexible' mixed use scheme. The Amount of development is not a reserved matter and is therefore proposed to be fixed at a maximum of 128,000 sqm (Gross External Area) for Phase 3. This compares with 42,356sqm proposed under the detailed



scheme for Phase 2. The total maximum floorspace proposed for the site is therefore 170,356 sqm (GEA). It should be noted that if Outline planning permission is granted for a certain maximum amount of development, then that is the planning permission and there is therefore the reasonable expectation that Reserved Matters approval would subsequently be granted for buildings that reflect that amount. It is not possible to 'row back' from an amount of development granted at outline stage. It is therefore vitally important that the LPA is satisfied that the physical expression of the amount of development sought at outline stage would result in an acceptable form of development, based on local plan policy.

- 2.9 Following a similar approach to previous Station Hill applications, the Applicant has submitted a set of Parameter Plans and a Design Code document which can be secured by condition and which seek to set clear limits on the development and demonstrate that an appropriate level of design quality will be achieved.
- 2.10 The Parameter plans subdivide Phase 3 into four plots with a central area of public realm. The plans allow for the buildings to shift in terms of their positions within each plot and the public realm to shift accordingly. The public realm is set at a minimum width of 18 metres between plots at ground floor and first floor level but it is proposed to allow this to narrow to 12 metres on upper floors for some of the length and a further reduction to a minimum of 9 metres between facades from second floor upwards is proposed where plots that are opposite one another are both in a commercial use. A pedestrian walkway would lead from the public realm through to Greyfriars Road via a flight of steps.



Extract from Parameter Plan drawing SHRN-CRL-S3-ZZ-PL-A-0705-P02

- 2.11 The heights of buildings within the plot are set with minimum and maximum heights above sea level. Plot C is the tallest proposed at a height of up to 163m AOD (minimum 81m AOD). Street level at the South West Interchange/taxi rank on Station Hill is approximately 40m AOD giving a maximum height above adjacent street level of 123mAOD. Assuming a minimum storey height of around 4 metres this gives a 30 storey building (N.B. storey heights may be greater, especially at ground floor level). The maximum heights step down anti-clockwise from this point with Plot A rising to a maximum of 126.5 m (AOD) with Plot B at the corner of Greyfriars Rd and Garrard Street (potentially joined to the building on Plot A) set at a maximum 97.4m AOD, before stepping up again to a maximum of 116.5 on Plot D fronting Garrard Street (77.5m tall relative to Garrard Street).
- 2.12 The extant permission ('SH3') Floorspace comprises 151426/190442 (Plot E) plus 151427/190441 (Plot F and North Site) giving a total of 181,950sqm GEA across the whole Station Hill site.
- 2.13 A direct comparison with the current application floorspace is difficult as Plot F was included in the overall North Site maximum floorspace under 151427/190441 and has now been separated out. The size of the building on Plot F is defined more by the parameter plans under that permission rather than a precise floorspace per plot. I.e. it is ultimately dependant on reserved matters approvals, not the Outline.
- 2.14 To give an indication, the current approved floorspace Plot E (41,750sqm), plus Plot F (19,500sqm residential plus other uses not specifically defined) + the current proposal (192032/HYB) at 170,356 sqm (GEA) gives at least 231,606sqm GEA across the whole Station Hill site. This amount would be greater as this figure excludes the non-residential floorspace in the South Site. It is clear from these figures that the current proposal represents a substantial increase in floorspace compared with the extant permissions.

### **Environmental Impact Assessment**

- 2.15 The development is EIA Development as defined under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. A new Environmental Statement has been prepared in support of the application. The scope of the ES was agreed and a Scoping Opinion issued in July 2019 (190833/SCO). The ES, including subsequent changes have been subject to the statutory 30 day public consultation.

### **Community Infrastructure Levy (CIL)**

- 2.16 The development would be liable for CIL. The Council's CIL Charging Schedule sets a base rates per square metre for different uses. The rate is index linked from the date of adoption of Schedule in and the current rates for 2020 include:
- £157.18 per square metre (Gross Internal Area) for residential and sheltered accommodation
  - £39.29 per square metre (GIA) for office accommodation in the Central Core (which includes the application site).
  - Care homes (nursing care and fully catered), retail and other development have a zero charge.
- 2.17 The figures below are based on the supplied CIL forms supplied by the Applicant. The final CIL figure for Phase 3 would depend on the floorspace proposed at Reserved

Matters application stage. Any offset for demolition will depend on existing building use and if the building still stands on day of granting the application.

**Phase 2 Office:**

*Table 2 – Total Proposed Floorspace (GIA/GEA) within the Detailed Component*

Land Use	GIA (sq m)	GEA (sq m)
Phase 2 – Plot G		
Office (B1)	34,736	35,003
Flexible Retail and Leisure (A1-A5, D1-D2)	1,174	1,214
Podium and Basement	5,941	6,139
Total	41,851	42,356

- 2.18 Assuming the podium and basement are associated with the office use, this would give a Phase 2 floor area of 41,851 sqm with a CIL charge of £1,644,325.79
- 2.19 Phase 3 is submitted in Outline and proposes a range of uses as shown in the table below. A maximum total floor area cap of 128,000 (Gross External Area) is proposed. It is difficult to predict with any certainty what the CIL charge would be. For instance, the residential floorspace could be zero or 63,500sqm (GIA). This would be clarified at Reserved Matters stage.

*Table 3 – Proposed Land Use Mix (GIA/GEA) within the Outline Component*

Land Use	GIA (sq m)	GEA (sq m)	GIA (sq m)	GEA (sq m)
Phase 3 – Plots A, B, C & D				
	Maximum		Minimum	
Office (B1)	85,600	86,500	25,000	28,000
Residential (Class C3)	63,500	65,000	0	0
Residential Institutions (Class C2)	23,500	26,000	0	0
Hotel (Class C1)	23,500	26,000	0	0
Flexible Retail, Office and Leisure (A1-A5, B1, D1 & D2)	3,500	4,500	450	500
Podium and Basement	22,500	23,000	13,000	14,000

2.20 This gives an indication of the likely CIL outcomes for Phase 2 but is provided without prejudice to further examination of the CIL application by the Council.

## RELEVANT PLANNING HISTORY

3.1 The most relevant planning history in relation to Station Hill is detailed below.

Application no.	Proposal	Decision
130436	Outline application for mixed use redevelopment of the site through the demolition and alteration of existing buildings and erection of new buildings & structures to provide Offices (Use Class B1), a range of town centre uses including retail and related uses (Use Class A1-A5)leisure (Use Class D2) and residential units, associated infrastructure, public realm works and ancillary development (all matters reserved).	Permission with S.106 15/1/2015. Implemented
130440	Demolition of Station Hill Retail Parade (including 26 to 58 Station Hill) to create a multipurpose area to be used for holding temporary events. Works of hard and soft landscaping and other incidental works.	Temporary permission 20/1/2014. Implemented.
151426	Outline application with all matters reserved for mixed use redevelopment of Plot E of the Station Hill site and neighbouring Telecom House site (48 to 51 Friar Street & 4 to 20 Garrard Street) to comprise the demolition of existing buildings and erection of new buildings/ structures to provide residential units, a range of town centre uses including retail and related uses (Use Class A1 - A5), associated infrastructure, public realm works and ancillary development.	Permission granted 26/7/16.
151427	Section 73 application to vary conditions 2,5,6,54 and 57 of outline permission 130436 to remove reference to Plot E.	Permission granted 26/7/16.
151543	Application for approval of reserved matters following outline approval (130436), matters of Access, Appearance, Landscaping, Layout and Scale.	Permission granted 2/8/2016  (Plot B Station Hill for a 19-storey B1 office building).  Not implemented.
151544	Public realm works associated with outline planning permission reference 130436.	Public realm application for additional small area of land on Station Hill.

		Approved 21/9/16 Implemented.
Various	Various approvals pursuant to conditions attached to 130436/OUT	
181820	Request for an EIA Scoping Opinion for s.73 Minor Material Amendment (Outline) and Reserved Matters applications pursuant to permissions 151426/OUT and 151427/VAR, involving demolition of existing buildings and construction of a mixed use development comprising residential development (C3), office development (B1A), retail (etc) uses (A1, A2, A3, A4, A5), leisure development (D2) and associated car parking and public realm works.	Opinion provided 14/11/18
182168 (Garrard St Car Park)	Application for prior notification of proposed demolition of the existing car park.	Prior Approval Given 11/2/19 Not implemented.
182171 (Telecom House and Friars Walk Shopping Centre)	Application for prior notification of proposed demolition of the Telecom House and Friars Walk Shopping Centre.	Prior Approval Given 11/2/19 Demolition completed.
190441	Outline application (pursuant to section 73 of the Town & Country Act 1990) for mixed use redevelopment of the site through the demolition and alteration of existing buildings and erection of new buildings & structures to provide Offices (Use Class B1), a range of town centre uses including retail and related uses (Use Class A1-A5) leisure (Use Class D2) and residential units, associated infrastructure, public realm works and ancillary development (all matters reserved) as permitted by planning permission 151427 granted on 26 July 2016 (which itself was an application under S73 to vary planning permission 130436 granted on 9 January 2015) but without complying with Conditions 3, 5, 7, 8, 17, 19, 54 and 57 in respect of Plot F 'Station Hill'.	Approved subject to S106 17 July 2019 PAC - Permission issued 6 December 2019.
190442	Outline application with all matters reserved for mixed use redevelopment of Plot E of the Station Hill site and neighbouring Telecom House site (48 to 51 Friar Street & 4 to 20 Garrard Street) to comprise the demolition of	Approved subject to S106 17 July 2019 PAC - Permission issued 6

	existing buildings and erection of new buildings/ structures to provide residential units, a range of town centre uses including retail and related uses (Use Class A1 - A5), associated infrastructure, public realm works and ancillary development as permitted by planning permission 151426 granted on 26 July 2016 but without complying with Conditions 3, 5, 6, 7, 8, 16, 17, 21, 37 and 50.	December 2019.
190465	Application for the approval of reserved matters (access, scale, appearance, layout and landscaping) for Plot E within the development site known as Station Hill submitted pursuant to Outline Planning Permission ref. 190442, and submission of details for approval pursuant to Conditions attached to that permission. The proposals comprise the construction of a 12 storey building (plus basement storey) containing 370 Build to Rent residential units (Use Class C3), 1,151sqm (GEA) of flexible retail floorspace (Use Classes A1, A2, A3, A4, A5), cycle storage, car parking, servicing, plant areas, landscaping, new public realm and other associated works (amended description).	Approved subject to approval of 190442, 17 July 2019 PAC - Approval issued 6 December 2019.
190466	Application for approval of reserved matters (access, scale, appearance, layout and landscaping) for Plot F within the development site known as Station Hill submitted pursuant to Outline Planning Permission ref. 190441, and submission of details for approval pursuant to Conditions attached to that permission. The proposals comprise construction of a 12 storey (plus basement storey) building containing 168 Build to Rent residential units (Use Class C3), 390sqm (GEA) of flexible retail floorspace (Use Classes A1, A2, A3, A4, A5, D2), 656sqm (GEA) of leisure floorspace (Use Class D1 or D2), cycle storage, car parking, servicing, plant areas, landscaping, new public realm and other associated works (amended description).	Approved subject to approval of 190441, 17 July 2019 PAC - Approval issued 6 December 2019.
190833	Request for an EIA Scoping Opinion (in respect of North Site)	Opinion Issued - 24 July 2020
Various applications for approval of details pursuant to conditions attached to 190441/190442/190465/190466		

191983	Non-material amendment to approval of reserved matters 190465 (Plot E Station Hill). Various changes to internal layout and external elevations. D2 use at LGF level.	Agreed - 15 June 2020
191984	Non-material amendment to approval of reserved matters 190466 (Plot F Station Hill). Various changes to internal layout and external elevations. Introduction of D1 use.	Agreed - 15 June 2020
200489	A package of enabling works including demolition, the removal of existing structures, services and hard surfaces, excavation of ground, exploratory works, relocation of soft landscaping and the erection of site hoarding.	Approved 29 June 2020

#### 4. CONSULTATIONS

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

#### 4.2 Environment Agency:

*"The site lies within Flood Zone 1 in accordance with our flood map for planning. Flood Zone 1 is defined as having a low probability of river flooding in accordance with Table 1 'Flood Risk' of the Planning Practice Guidance. The site over lies the Chalk principal aquifer so groundwater is sensitive in this location.*

##### *Environment Agency position*

*We have no objections to the proposed development subject to the following condition being imposed on any planning permission granted. We have reviewed the two site investigation reports by Ramboll dated April 2019 and August 2019 for Station Hill Reading. The reports indicate that with the exception of an area of a possible former tank near BH204, the site appears to have low levels of contamination. We note however that the coverage of the southern site by boreholes was limited by the presence of buildings. Therefore we would concur with the comments in section 11.2 that additional site investigation is required. We note that infiltration drainage is not proposed.*

*The application's site investigation reports demonstrates that it will be possible to manage the risks posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken. We believe that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the local planning authority. In light of the above, the proposed development will be acceptable if a planning condition is included requiring the submission of a remediation strategy. This should be carried out by a competent person in line with paragraph 178 of the National Planning Policy Framework. Without this condition we would object to the proposal in line with paragraph 170 of the National Planning Policy Framework because it cannot be guaranteed that the development will not be*

*put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.*

*Condition: Prior to each phase of development approved by this planning permission no development shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the local planning authority. This strategy will include the following components:*

*1. An additional site investigation scheme, based on the initial site investigation to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.*

*2. The results of the site investigation and the detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.*

*3. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.*

*Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.*

*Reasons: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in line with paragraph 170 of the National Planning Policy Framework."*  
*[Officer comment - this accords with the Council's EHO advice and standard Contaminated Land conditions]*

#### **4.3 Historic England**

Initial advice in February 2020:

*"The proposed scheme is in 2 parts; part 1 for Plot G, and part 2 a new outline planning for Plots A, B C and D. Plot E is part of a different planning application that the submission information suggests will have been granted permission recently and in any case is not the subject of this application. The proposed building for Plot G is markedly taller than the approved 2013 scheme but this is unlikely to have undue harm to heritage assets. However, the outline proposals for Plots A and C are for maximum heights to be considerably taller than permitted in the 2015 scheme which would result in them being a great deal more visible and intruding on the setting of Grade I listed Reading Minster and Grade I listed Greyfriars Church. They would also have a detrimental impact on the St Mary's Butts/ Castle Street conservation area.*

##### Advice

*The application is made following the consented scheme for the site under 13/00462/OUT. Historic England welcomed the reduced maximum height of many of the buildings for the reduced impact this would have when compared to the earlier consented scheme 09/01079/OUT. We raised concerns about Plot E, which is subject to a different planning application, because of impacts on Grade I Greyfriars Church.*



*This current proposal, however, puts forward maximum tower heights that would result in development that is more harmful to heritage assets than the 2013 scheme and would have a more harmful impact upon the townscape of Reading as a whole.*

*In particular, the proposed maximum heights of Plot A and Plot C which are +151.5m AOD and +163m AOD respectively would have a demonstrably harmful impact on the Grade I listed Greyfriars Church when viewed from Friars' Street and the roundabout to the west of this, looking east. Views from these points were not included in the Environmental Statement Views Assessment (views from Chatham Street were the closest on page 7 of the pdf). This church has always featured strongly in the townscape. When built it would have dominated one of the main entrances into the town and despite the increasing size of surrounding development it still remains a commanding presence on Friar Street. The proposed towers would be an unwelcome intrusion that would harm the remaining prominence of this building.*

*In addition, because of the height of Plots A and C these towers would be highly visible within the setting of Grade I listed Reading Minster, as illustrated by the viewpoint 8.26 Viewpoint 28 (page 22 of the pdf) and within that central historic core of the Castle Street/ St Mary's Butts Conservation Area. As a major medieval church it was intended to dominate this part of town and the space around it allows for this. As surrounding buildings are relatively low the church's dominant position in the townscape remains intact. The proposed towers would rise up prominently behind and to the side of the Minster tower and could compete with the tower in views looking north, detracting from this important view of the Minster.*

*Whilst we would not go so far as to conclude that the impact on setting equated to substantial harm it would nevertheless be serious. To address this issue we recommend that the heights on the parameter plan are adjusted so that they are no higher than that of the consented scheme from 2013.*

*We would also note that the proposals have a degree of harm on the Town Hall, Church of St Lawrence and the Market Place/ London Street conservation area, which should be taken into consideration.*

#### *Recommendation*

*If built out to the maximum limits of the parameter plans the significance of Greyfriars Church, Reading Minster and Castle Street/ St Mary's Butts conservation area would be materially harmed through negative change to their setting. As this harm could be mitigated, while delivering the public benefits associated with the scheme, by restricting the height of this element to previously consented levels we do not consider the level of harm justified in terms of paragraph 194 of the NPPF. It is therefore recommended that planning permission is only granted if the application is revised and the maximum permitted height of Plots A and C are reduced."*

*Subsequent advice following revisions in May was as follows:*

*"Our assessment of harm remains unchanged from that set out in our original consultation response letter, that harm to the significance of Grade I listed buildings Greyfriars Church and Reading Minster (St Mary's Butts), and a degree of harm to the Castle Street/ St Mary's Butts conservation area would occur and that it would be less than substantial.*

However, having explored the additional plans, some further thoughts and recommendations are set out below.

*The nature of this outline scheme is problematic because the detail submitted does not set out either the form of the towers (their shape) or the external treatment (the artist's impression of a possible scheme illustrates how different external treatments could seek to reduce visual harm). Whilst height is a key component of how visually intrusive the towers could be, the shape of the buildings and their mass or bulk can also reduce or exacerbate this. Particular design choices could go some way to minimising harm.*

*By reducing the height of block C this will almost certainly have less impact on the setting of Reading Minster and could possibly remove harm entirely. The shape of tower C could also be designed to have less impact, for example by have a more slender shape orientated north south, so that less mass is seen adjacent to the Minster tower.*

*The visual change to the setting of Greyfriars church with the current proposals will be great, but the ability to reduce the towers sufficiently to meaningfully avoid harm appears less possible. The stepped building heights proposed make sense in townscape terms and is a nod to the Grade I listed building. But both the coloured block and artist's impression plans indicate a bulk and massing of towers that would create a dense/layered backdrop the scale of which dwarfs this important listed building. Still, lower height towers (specifically blocks A and C) would go some way to reducing visual dominance. As with Reading Minster, the shape of the buildings could reduce harm further, for example by having clear spacing between the blocks.*

*It would be appropriate for the Design Code to set out clearly how the tower designs could address the issues raised above, and establish a commitment to minimising the harm set out, as is recommended in paragraphs 126 and 190 of the NPPF.*

*We acknowledge that this area of Reading is designated within the Local Plan as a location for tall buildings within the town, which has the potential to create a new skyline, an enticing contemporary urban environment and much needed residential and employment accommodation. However, a scheme that achieves the highest design standards should seek to minimise harm to heritage assets, as set out in paragraph 127 of the NPPF.*

*It remains unclear why this application proposes buildings that have considerably taller upper parameters than 13/0436/OUT and a greater massing/ bulk than 09/0179/OUT. We question whether this increase is justified and Reading Council should satisfy itself that it is, if it wishes to approve the scheme. Where the height is justified, the tower shapes, spacing of towers and exterior appearance (finishes) should clearly seek to reduce harm to heritage assets and the Council should seek assurances at this stage that the highest design quality will be achieved.*

#### **Recommendation**

*Historic England has concerns regarding the application on heritage grounds. If built out to the maximum limits of the parameter plans the significance of Greyfriars Church, Reading Minster and Castle Street/ St Mary's Butts conservation area would be materially harmed through negative change to their setting.*

*As this harm could be mitigated, while delivering the public benefits associated with the scheme, by a combination of reducing building heights and by sensitive building shape, spacing and exterior finish we do not consider the level of harm justified in terms of paragraph 194 of the NPPF.*

*We recommend that Reading Council seeks amendments to the proposals as set out above, and seeks greater assurance that design solutions needed to remove or minimise harm can be found."*

#### **4.4 RBC Transport (Highways Authority)**

"The hybrid planning application submitted comprises a detailed and outline element. The detailed element includes Plot G and the surrounding podium and landscaped area (Phase 2) whilst the outline element includes Plots A, B, C and D, the surrounding landscaped podium and basement (Phase 3). The planning description of the Development is as follows:

The OUTLINE planning application for Phase 3 reserves all matters for four building Plots (A, B, C and D) that range in height, with the highest being 163m AOD and the lowest being 62m AOD, on the site for a comprehensive mixed-use redevelopment comprising:

- *Residential (Class C3) comprising up to 750 residential units;*
- *Hotel (Class C1) - up to 26,000 m2 (GEA);*
- *Residential Institutions (Class C2) - up to 26,000 m2 (GEA);*
- *Business Use (Class B1) - up to 86,500 m2 (GEA);*
- *Flexible Retail, financial and professional services, restaurants and cafes, drinking establishments, hot food takeaways, non-residential institutions and assemble and leisure (Class A1, A2, A3, A4, A5, D1 and D2) - up to 4,500 m2 (GEA);*
- *Podium, Basement, ancillary and plant space - up to 23,000 m2 (GEA);*
- *Formation of new pedestrian and vehicular access;*
- *Means of access and circulation and car parking within the site; and*
- *Provision of new public open space and landscaping.*

*The FULL details for Phase 2, comprise a ground plus part 8 / part 17 storey building and a landscaped podium (Plot G). The scheme submitted includes:*

- *The demolition of existing structures on the site,*
- *The erection of a podium to allow vehicular access and parking within the site,*
- *The provision of a new public open space,*
- *Bridge link and landscaping*
- *The erection of a building for office (Class B1) and*
- *Flexible retail, non-residential institutions and assemble and leisure uses (Class A1, A2, A3, A4, A5, D1 and D2)."*

*A Transport Assessment has been submitted to accompany the application and I comment on this as follows:*

### Site Location

*The site is located centrally within Reading Town Centre adjacent to Reading Railway Station, making it a key gateway into Reading. The site is bounded by Reading Station and its south west interchange to the north, Thames Tower to the east, Garrard Street to the south and Greyfriars Road to the west.*

*The site was previously occupied by the Western Tower offices, Station Hill shopping parade, a bingo hall and a bus station which have all since been demolished in preparation for the Station Hill development.*

*Currently the site includes Xafinity House, Garrard Street Multi-storey Car Park and an area on Station Hill used as Temporary Event Space. Xafinity House is an office building which has a vehicular access on Garrard Street. Garrard Street Multi Storey Car Park (MSCP) is currently operated by NCP as a public car park and has 894 marked bays. Vehicular access and egress to the car park is via Garrard Street at three separate points (2 entry, one exit).*

*The bus interchanges, where many of the towns' bus routes pass through are located adjacent to the site on Station Hill (South Western Interchange), Station Road and Forbury Road (South Eastern Interchange) and the Northern Interchange to the north of the station which is accessed directly to the site by the new subway which is a permissive right of way. However, the furthest interchange at the northern concourse of the station will be within a 5 minute walk of the centre of the new Station Hill development.*

*The main shopping centre is within a 2-minute walk and the main existing town centre leisure facilities at the Oracle centre are within a 5-minute walk of the site.*

*Given the above the site is in a very sustainable location and meets the aims of paragraph 103 of the National Planning Policy Framework (NPPF) to locate development where opportunities to use sustainable transport exist.*

### Pedestrian Movement Analysis

*It is important that the public realm areas are not only attractive and safe environments to congregate in, but also function effectively in terms of demand for movement and wayfinding. To help in the design and to demonstrate that the public realm proposals and alterations to the south west interchange could cater for all predicted movements, a micro-simulation model was developed by the applicant.*

*It is stated that the model was built using a robust future pedestrian flow forecast based on the doubling of existing Station and public realm users (in accordance with maximum growth expectations at Reading Station), plus additional new flows from the various planned station area developments (from the adopted RBC Reading Station area Framework).*

*I note that the landscape scheme included within the micro simulation model has been slightly revised and I accept that the latest design is an improvement over what was previously modelled as it provides greater space for pedestrian movement.*

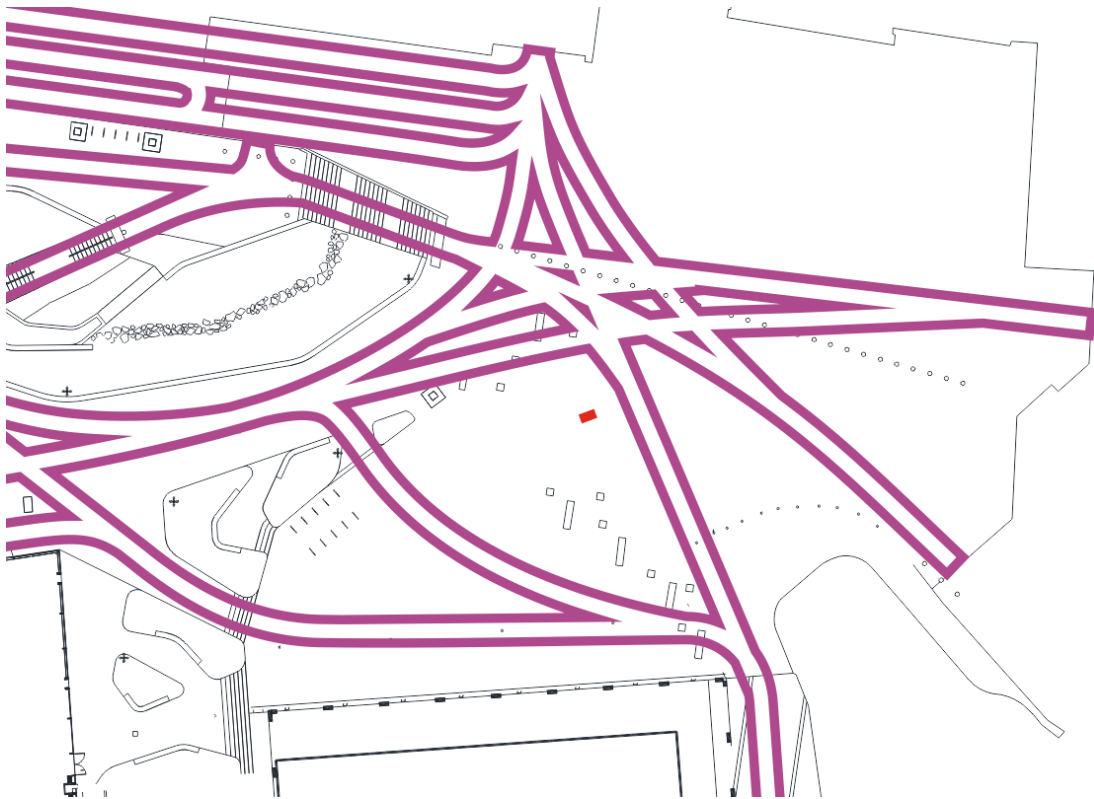
*The modelled forecast matrix for the micro simulation is based on the period between 17:00 and 18:00, since through analysis undertaken from reviewing taxi and passenger demand, this was identified to be the busiest period of the day. The forecast flows account for a doubling of observed station passengers, pedestrians walking through the Station Interchange / Station Square and the additional Station Hill people movements.*

*It should be noted that the model has been updated to reflect the reduced step width and the removal of the station entrance planter area. These have not been updated in the 3D backdrop image, but are in the underlying modelling, hence pedestrians will appear to be walking through the planter area. This was the rationale for the removal of this planter area.*

*The applicant has provided a selection of screen shots through this peak hour to illustrate the pedestrian demand and desire lines through the development and Station forecourt and the Highway Authority are happy that the proposed design is sufficient to accommodate the pedestrian flows.*

*Irrespective of the above I would stress that although the applicant may believe the overall quality of the public realm would be bettered with the removal of the existing advertisement screen there are currently no agreements in place for the removal of the screen and therefore it is existing infrastructure that must be illustrated on the submitted plans. The applicant has stated that plans will be amended to include the existing advertising screen and that the location of the screen base (Red Block) has been indicated on the desire line illustration below. The screen is located outside of the main pedestrian desire lines and therefore no conflict would occur.*

*Also included within the below image is the latest landscape proposal with pedestrian desire lines indicated. This does provide for permeability and illustrates desire lines that have been designed into the proposal to accommodate for the existing movements and the new routes proposed through the development.*



### **Pedestrian Access & Public Realm Enhancements**

*The site is ideally located within Reading Town Centre with all local amenities within walking distance of the site including the retail core, Railway Station and numerous bus stops.*

*Pedestrian movement through the site is set to be improved by the creation of a movement spine, connecting Reading Station to Friar Street without a change in grade. All building plots incorporate frontage access from this public realm Plaza level. Additionally, pedestrian access to all plots will also be at street level from Garrard Street, Station Hill and Greyfriars Road with these streets at a lower level than the podium.*

*To accommodate for the level difference at the south west station interchange on Station Hill and Greyfriars Road steps and publicly accessible lifts are to be installed in addition to stairs to ensure the development is fully permeable from all the surrounding streets. Steps up from Garrard Street north side and a lift within Station Hill South have also been accommodated to provide connections from Garrard Street.*

*The Development proposes significant improvements to public realm and connectivity for Reading and the Development through the provision of a step-free north to south link through the Development and creation of new and enhanced landscape areas.*

*The Development masterplan and landscape strategy has been orientated to invite people through the development and to encourage people to travel through the site. As part of these proposals it is proposed that the existing amphitheatre stairs that*

link Station Square to the subway and south west interchange are removed and the steps altered. As part of the proposals to alter this area and make the best use of the available space it is proposed to create a Pocket Park. The Pocket Park is an area where people can sit/play and enjoy the space while also providing key links from the interchange area and subway to the Station and the Development. This is to provide a gateway into Reading for people travelling by rail, bus or taxi and a better environment for people walking through the area.

*Given all of these requirements the Highway Authority are content that the provision of the ramp would have a detrimental impact on other aspects of the development*

*and significantly reduce the building footprint and therefore there are no objections to a ramp being omitted.*

*The proposal includes the provision of a pedestrian bridge between the proposed development site and the consented development of Friars Walk. Initially, none of the submitted plans illustrated how these two connect to ensure that an adequate pedestrian route is provided between the two and what implications this has for the consented steps from the Friars Walk podium to Garrard Street. It has now been confirmed that the applicant submitted a non-material amendment (NMA) pursuant to the Phase 1 planning permissions to allow for the bridge landing within Phase 1 on the 17 June 2020. The Phase 1 NMAs will be determined at the same time as the Phase 2/3 hybrid planning application so that both can come forward together, providing the continuous link from the Station to Friars Street. I will therefore provide comment on this link as part of that NMA application.*

*It is noted through the plans provided at Appendix G of the Transport Assessment that a temporary footway is proposed on the northern side of Garrard Street at the western end until Phase 3 progresses, which in principle is acceptable. However, it is also identified that a future layby is proposed which is to be for parking and loading. It has now been clarified that it is the applicant's intention to provide a new footway at the back of the proposed layby. Drawing 44470-5502-SK047 Rev A has been submitted and illustrates a min. 3m footway will be maintained and the principle of this is accepted. The applicant has stated that it may be more appropriate for them to maintain this whole area rather than split this between LPC and RBC, and this would ensure consistency of materials. However, as the drawing illustrates the existing Highway would make up part of this proposed width in any case and the Highway Authority would not want this area of footway to be stopped up. A dedicated adoptable footway must be retained I therefore suggest that the 3m specified on the drawing is the extent of adoption, if the applicant wishes to alter this it can be reviewed as part of the S278 Agreement.*

*A new footway is also proposed to the west of the new vehicular access as indicated on LDA drawing SHRN-LDA-S2-ZZ-PL-L-100-101 and this is deemed acceptable.*

*The crossfall on the footway along Garrard Street at the foot of the steps complies with the required design standards DfT documents Manual for Streets and Inclusive Mobility.*

*As part of the previously consented scheme the development including a raised crossing facility on Garrard Street given that the proposed pedestrian routes on the north and southern side of Garrard Street met at this point. At the pre-app stage it was identified that given the proposed bridge a raised crossing facility would not be required as previously identified. However, the Highway Authority identified that a crossing facility may still be warranted to get between the Garrard Street access to Plot G and Merchants Place which leads to Friar Street to the south. A location to the east of the proposed layby to the south of Plot G has been identified to develop an informal crossing point and is shown on Drawing 44470-5502-SK048. The Highway Authority are happy with this proposal.*



*At the bottom of the steps leading west to the South West Interchange access to the lift core is proposed however, the doors open outwards over the Public route which is detrimental to Highway safety and is contrary to Section 153 of the Highways Act. Clarity has been provided confirming that this exit door serves as a fire egress point for the podium levels to the south and requires the door to open outward for evacuation. The exit door is recessed into the site away from the pedestrian desire line of the Station Hill footway and stairs leading to the Station Square Level. There are no alternative locations for the exit door as the podium areas to the east abuts the landscaped Pocket Park, and future office lobby and amenity areas to the east. The door has been recessed as far south, away from the area of highway, as possible given internal constraints related to vehicle circulation and servicing to the office buildings. The Highway Authority are therefore happy with the doors opening out over the Highway.*

### **Highway Network**

*The site's existing operational vehicular access points are all connected to Garrard Street with access and egress gained only from the western end via Greyfriars Road. Garrard Street is a single carriageway which is two-way along its length. However, while general traffic can only enter and exit Garrard Street from its junction with Greyfriars Road, buses and taxis can currently travel eastbound only to Station Road at its eastern end, although no buses use this route.*

*Additional access points to the disused Xafinity House office and former Bus Station are also present but are currently only used by construction/site maintenance vehicles. Servicing and deliveries were also historically made from Greyfriars Road and Garrard Street. Vehicles are not permitted to access Garrard Street from Station Road.*

*To access the wider highway network, Garrard Street connects to Greyfriars Road at its western end via a priority junction. Greyfriars Road provides north and south connections from Tudor Road to Sackville Street, however Greyfriars Road at its southern end is northbound only. Greyfriars Road at its northern end links to Tudor Road, which in turn provides a southbound connection onto the IDR Caversham Road (A329) via a traffic signalled junction. This is restricted to left-in left-out vehicular movement.*

*The principal vehicle routes to the site are via the IDR. The IDR is for the most part a dual, two lane orbital route which provides the following connections into Reading town centre:*

- North: Via Reading and Caversham Bridges;*
- East: Via the A329 Kings Road and the A4 London Road, leading to the A3290 and J10 of the M4;*
- South: Via the A33, leading to Junction 11 of the M4;*
- West: Via the A4, the junctions with A4155 Castle Hill and the A329 Chatham Street.*

*The temporary event space adjacent to the south western station interchange is accessed from Station Hill via a crossing of the southern footway.*

### Cycle Access Strategy and Cycle Parking

*The site is bounded by Station Hill, Greyfriars Road and Garrard Street which are all part of RBC's designated on-street cycle network. The scheme has therefore provided access to secure cycle parking for employees and residents directly from these streets, which I will comment on further within this section.*

*Although these routes are already designated as part of the on-street cycle network, it was stressed during the pre-application discussions that improvements to the cycle infrastructure surrounding the site should be enhanced as well as enabling cyclists to travel through the site linking to the Reading Station underpass. The underpass is currently being reviewed as part of an upgrade to allow a traffic-free route from Station Hill to Vastern Road to help strengthen the north-south cycle connection to the River Thames and Caversham, currently cycling is not permitted through the underpass. The upgrade would consist of physical works in the same way as a junction capacity upgrade or improvements to other Highway infrastructure and therefore contributions are required to implement these works.*

*The proposal will result in increased trips above that of the existing uses on the site and will include trips to and from the north via the underpass. As a result, the development must contribute towards the improvements to the underpass to make it suitable to accommodate pedestrians and cyclists. A contribution of £200,000 is therefore sought.*

*The requested contribution is required to assist in mitigating the impact of the increased trips generated by the development to make it acceptable in planning terms. This contribution would also meet the relevant tests:*

- necessary to make the development acceptable in planning terms;*
- directly related to the development; and*
- fairly and reasonably related in scale and kind to the development.*

*The upgrade is not included on the CIL 123 list and therefore a S106 contribution towards this upgrade is required.*

*With consideration to the above and through further liaison with RBC the masterplan has been developed acknowledging the principles described below:*

*▫ Cycle access through the site at podium level will be permitted, with the landscape strategy developed effectively as shared space to promote cautious and considerate cycling through the scheme thereby significantly reducing the risk of collisions with pedestrians;*

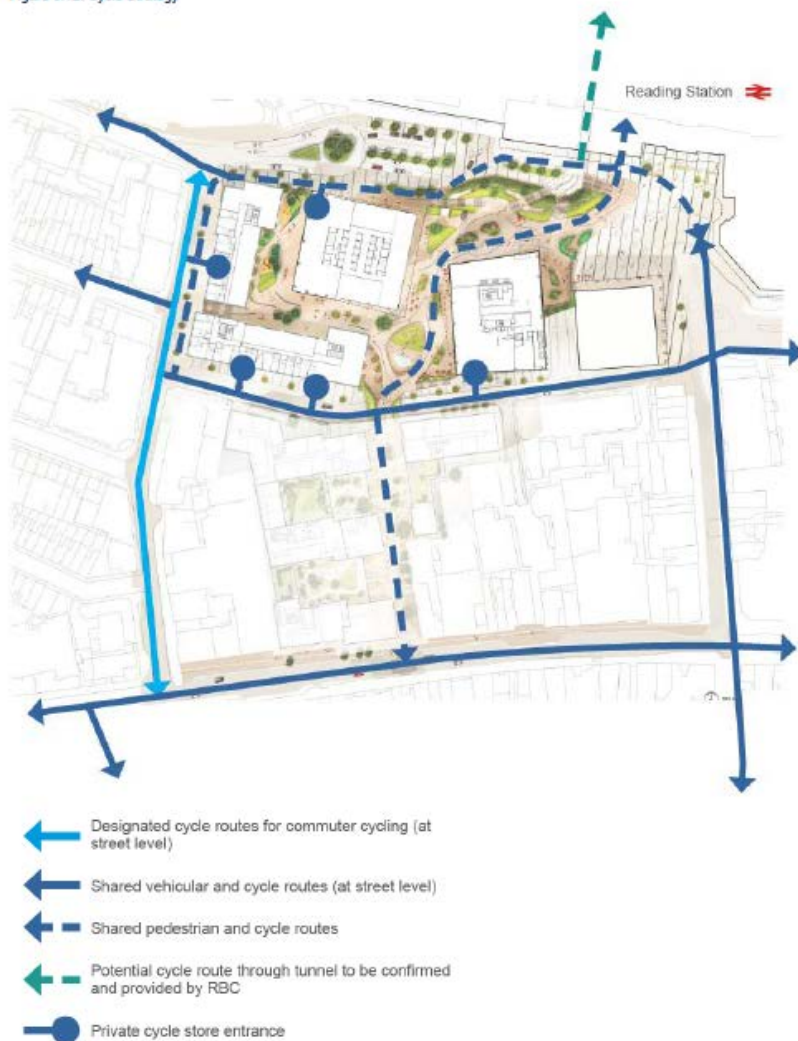
*▫ Cyclists encouraged to use designated cycle routes such as Garrard Street, Station Hill, Greyfriars Road and Friar Street;*

*▫ Visitor cycle parking stands will be provided at the entrances to the development within the public realm;*

- Cycle parking for residents and employees will exceed RBC standards and be secure, covered and provided adjacent to the designated cycle routes within plots;
- Facilities such as showers, lockers and drying rooms will be provided
- Proposals for the Station Square / Pocket Park will;
  - o facilitate RBC's aspiration of allowing cyclists to use the railway underpass;
  - o assume shared pedestrian and cycle principles; and
  - o provide cyclists using the subway and Station Hill with a new wheeling ramp to facilitate access up the steps to Station Square as an alternative to the existing ramp.
- Consider how the neighbouring cycle routes could be improved and enhanced for cyclists if necessary. These routes include;
  - o Greyfriars Road;
  - o Garrard Street;
  - o Station Hill.

Based on these principles, the Cycle Strategy for the site has been developed and illustrated on Figure 6.12. This shows how the Development aims to promote and strengthen cycle connectivity with a package of measures aimed at encouraging and enabling travel by bicycle. The cycle improvement measures being proposed are discussed below.

Figure 6.12: Cycle Strategy



Consideration has been given to how the on-street cycle routes on Garrard Street, Greyfriars Road and Station Hill could potentially be improved for cyclists as part of the development proposals taking into account the complex existing pedestrian, vehicle and cycle access requirements in the area. The proposed improvements which include:

- Shared Footway/Cycleway on Station Hill and Greyfriars Road indicated with embedded shared foot/cycleway markings to support shared nature (adjacent to Plots A, B and C), which will connect through to the subway;
- Coloured Advisory Cycle Lanes along Greyfriars Road on both sides of the road creating a direct north south cycle link between Station Hill and Friar Street;
- On-road Cycle Markings and signage along the length of Garrard Street to highlight to drivers the likely presence of cyclists along this route;
- Raised Crossing across Garrard Street to act as a traffic calming measure to slow drivers when entering and exiting Garrard Street;
- Tightening of kerb radius at Garrard Street / Greyfriars Road and Tudor Road / Greyfriars Road junctions to act as a traffic calming measure and to assist cyclists position and reduce conflict with vehicles;
- Creation of on-street car parking on Garrard Street to enable RBC to remove parking on Greyfriars Road if required.

It should be noted that the proposed cycle improvement scheme will be subject to agreement with RBC Highway Authority under a s278 agreement.

### Cycle Scheme Design

The applicant has provided numerous improvements to the cycling network which includes advisory cycle lanes on both sides of Greyfriars Road connection to a shared footway/cycleway on Station Approach to the station underpass as well improvements to cycle facilities at the junction of Friar Street/Greyfriars Road/West Street. These have been deemed acceptable and will be subject to a S278 Agreement.

It should be noted that the proposal includes the removal of the speed cushion along Greyfriars Road however discussions with Network Management have confirmed that if the existing speed cushions are to be removed then a replacement physical speed calming measure along the same stretch of Greyfriars Rd should be provided.

The proposal includes the provision of a road narrowing with give-way priority as a replacement to the speed cushions. A swept path analysis has been provided and this identifies that vehicles will be able to manoeuvre through the narrowing with limited impact on the cycle lanes. It has been identified by the applicant that Sainsbury's service vehicles approach from Friar Street and reverse into their facility and it is agreed that this proposal doesn't impeded this manoeuvre.

It is also agreed that given the southbound flow at this point is extremely low (with only vehicles travelling to Sackville Street passing past the give-way) it would not be anticipated that additional conflict with access to Sainsbury service area, due to vehicles waiting at the give-way, would occur.

*The cycle parking provision for the site proposes to exceed RBC Cycle Parking Standards where feasible. This section details the cycle parking provision by phase of the development.*

#### *Phase 2 cycle Parking*

*Phase 2 is formed of the detailed application and includes Plot G and the public realm improvements. Plot G will be primarily an office with retail at the plaza and Garrard Street level.*

*The cycle store accommodates 186 bicycles via two-tier cycle racks and includes lockers to store 8 Brompton style bicycles (within a two-tier locker system) with further space for 3 electric scooters/mobility scooters.*

*As a minimum, RBC standards specify that cycle parking for office use should be provided at 1 space per 200m<sup>2</sup>. Therefore, the 34,736 sqm of office floor area is provided with a provision of 174 bicycles for office users.*

*RBC standards specify that for retail facilities these should be provided at 1 space per 6 staff and an additional visitor space per 300sqm.*

*To calculate the minimum retail employee cycle parking requirements the staff numbers for Plot G have been estimated using the Homes and Communities Agency Employment Density Guide (3rd Edition). This suggests a retail employment density of 15-20 sqm for retail NIA. Using 1 employee per 17 sqm of retail GIA (1,174 sqm) would suggest 69 staff. On this basis storage for 12 bicycles would be required as a minimum to meet RBC's requirement for retail staff (69 staff / 6 = 12 spaces).*

*The combined staff total requirement is therefore 186 spaces, compared with the planned provision for 186 standard + 8 folding bike stores, thereby exceeding standards.*

*Retail visitors should be provided with 4 spaces (1,174 sqm (GIA) / 300 sqm). The visitor spaces are accommodated within the 60 spaces being proposed within the public realm during Phase 2.*

*The above provision complies with RBC's minimum cycle parking requirement and is therefore acceptable.*

*Additional consideration to serve visitors of the Development has been stated by the applicant as being 60 bicycles cycle spaces using Sheffield stands within the public realm. I have reviewed the proposals and it would appear that 4 areas of cycle parking have been proposed two consisting of 20 Sheffield stands (40 spaces) on Station Approach adjacent to the outline element of the development and another adjacent to the underpass. On the podium along the frontage of Thames Tower 8 Sheffield stands (16 cycle spaces) are proposed with the final area consisting of 10 Sheffield Stands (20 cycle spaces) located on Garrard Street east of the pedestrian bridge. This would however equate to a total provision of 56 cycle spaces. Although*

*this is below the 60 spaces specified I am happy that this provision is in excess of the standards and is therefore acceptable.*

*I have reviewed these cycle parking layouts and I can confirm that they are acceptable.*

*Access to the staff cycle store is gained securely at Garrard Street level and accessible directly from the street away from the vehicular access to reduce conflict with vehicles and this is deemed acceptable.*

*The Development provides showers and lockers for use by cyclists and other active transport users to help promote alternative modes.*

*The proposals also allow the flexibility for the safe and secure storage of micro-scooters or similar should this be required.*

### *Phase 3 Cycle Parking*

*Plots A, B, C and D are included in the outline scheme which forms Phase 3 of the Development. These plots are parameter based ranges of development comprising residential, hotel, retail and office land uses. The level of cycle parking required to meet RBC's adopted standards varies depending on the development option tested.*

*Regardless of what is finally proposed through the Reserved Matters the cycle parking proposed for Phase 3 will seek to exceed RBC standards where feasible. Residential cycle parking as a minimum will be provided at 0.5 spaces per 1-2 bedroom flat and 1 space per 3+ bedroom flat but it is highlighted that this will likely be exceeded. The hotel will provide cycle parking at 1 space per 6 staff members as a minimum.*

*It is also stated that a consideration to serve visitors of the development will be made within the public realm in the vicinity of the access from the surrounding streets. As a minimum this is expected to be a further 30 spaces above that proposed within Phase 2.*

*The details of cycle parking provision and layout are to be assessed within future reserved matters applications and I am happy that this is acceptable.*

### *Vehicular Access*

*The site will be accessible to general traffic from two new points of access, one from Garrard Street and one from Greyfriars Road. It is intended that the Greyfriars Road access point will be entry only while the Garrard Street access will facilitate entry and egress from the development.*

*During Phase 2 Garrard Street will be the sole point of access and exit to the car park, with the additional access point on Greyfriars Road introduced to serve Phase 3.*

*Further clarity has been provided to state that an entry system will be required to ensure access is secure to the podium car park. The access from Greyfriars Road is*

*intended to be two inbound lanes with an indicative barrier system shown on Drawing 44470-5502-SK041. This drawing illustrates an indicative barrier located 20m from the carriageway edge providing 40m of storage across both lanes able to accommodate at least 6 cars without obstructing the footway.*

*Table 3.2 of 'Design recommendations for multi-storey and underground car parks' states that the maximum capacity for a single-entry lane with no ticket issue and a lifting arm barrier is 550 vehicles an hour, theoretically two entry lanes could accommodate for 1,100 vehicles an hour. This is well within the expected peak arrival rate of the development and has been deemed acceptable subject to a condition requiring the barrier to be located as per the submitted plan.*

*Should a short term temporary use come forward on the Phase 3 area in the interim (through a separate temporary application) before Phase 3 is developed, there is the possibility that the Greyfriars Road access will be delivered and used to access and exit the temporary uses.*

*The location of vehicular access points and their visibility splays are shown in detail on Drawing 44470/5502/TA/06 and 44470-5502-SK043 incorporating the latest design with Drawing 44470/5502/TA/03 showing swept path analysis. I have reviewed these drawings and I comment as follows:*

- No visibility splays have been illustrated for the new Greyfriars Road access, however as this is currently provided as an entry only access point I am happy that no visibility splays are required at this time. A condition will however be requiring this to be retained as an entry only access.*
- The visibility splays for Garrard Street have been assessed on a 20mph speed and are deemed acceptable.*
- The visibility splay to the east of the new access onto Garrard Street and the west of the proposed service road will include trees within the visibility envelope. It has now been confirmed that it is the intention that the type of 'street trees' proposed (ornamental pear (Pyrus champlexifolia)) have been selected so as not to obscure visibility. These trees have a high narrow fastigate canopy (minimum 2m clear trunk) and narrow trunk. An image of the type of trees is included below. Given that it has now been confirmed which type of tree is proposed I am happy that the visibility is acceptable.*



*The car park will be developed separately in phases over Phase 2 and Phase 3 of the development proposal.*

*There is the possibility that an interim temporary application will be submitted separately in the future for interim uses of Phase 3 while Phase 2 of the Development is in operation. The temporary use area could be used to provide additional public parking or temporary leisure/retail uses.*

*There is a small provision for town centre occupiers for a number of parking spaces within the existing Garrard Street Car Park. During demolition and construction of Phase 2 these spaces would not be available, however dependant on the final level of car parking delivered re-provision for town centre occupiers for a number of spaces could potentially be provided in Phase 3.*

### **Service Vehicle Access**

*Service vehicles are proposed to enter and exit the development from the service road between the Development and Thames Tower that currently also serves as the car park exit. Removing general car park traffic will mean that this space will become a privately managed service area. The tracking illustrates larger vehicles having to reverse into the service area but given the low volume of articulated movements this has been deemed acceptable. It is noted that parking bays are located opposite the service road entrance and a proportion of these are to be removed to provide for suitable turning. Drawing 44470/5502/SK051 indicates that two on-street spaces could be retained. This would result in the loss of two bays when accounting for the additional bay linked to the proposals for Plots E/F. This is deemed acceptable.*



*All other vehicles would be able to access the site and use the turning area at the rear. I am therefore happy that the tracking is acceptable.*

*The general operation of this service road is discussed later within this consultation response.*

### **General Access**

*At the pre-application stage it was commented that the height of new bridge must be able to accommodate vehicles travelling along Garrard Street and a section was required to cover this point. It has now been confirmed that the new bridge will provide a minimum vertical headroom clearance of 5.3m to the highest road level between the kerbs in accordance with DMRB CD 127. This has been illustrated on Drawing SHRN-RAM-S2-ZZ-DR-S-2801 and is deemed acceptable.*

### **Taxi Strategy**

*Garrard Street is currently used by taxis queuing to use the south east interchange rank under a temporary arrangement.*

*As part of the development and public realm improvements it is intended that taxis will no longer be permitted to queue along Garrard Street, with RBC requiring (for network resilience reasons) that the eastern end of Garrard Street remain open but restricted to emergency vehicles only and buses (if they need to divert temporarily should an event or incident prevent use of Friar Street).*

*The new north and south west taxi interchanges were originally designed by RBC to accommodate the relocation of these taxis when the Station Hill development came forward.*

*Given that it has previously been a Council decision to remove taxis from Garrard Street it is not the responsibility of the developer to find alternative queuing locations for taxis.*

*To support the creation of a successful public realm and Pocket Park and to take advantage of the space available within this area it is proposed to alter the layout of the south-west interchange and increase the number of taxi waiting bays.*

*The proposed Pocket Park extends into the south west interchange area and therefore alterations are required to the south west interchange. Extracts of the existing and proposed layouts can be found below (Figure 6.6 and Figure 6.7 of the Transport Assessment), these illustrate that an increase of 4 taxis has been accommodated by widening the area available for queueing.*

Figure 6.6: Existing Taxi Rank Capacity (18 Vehicles)

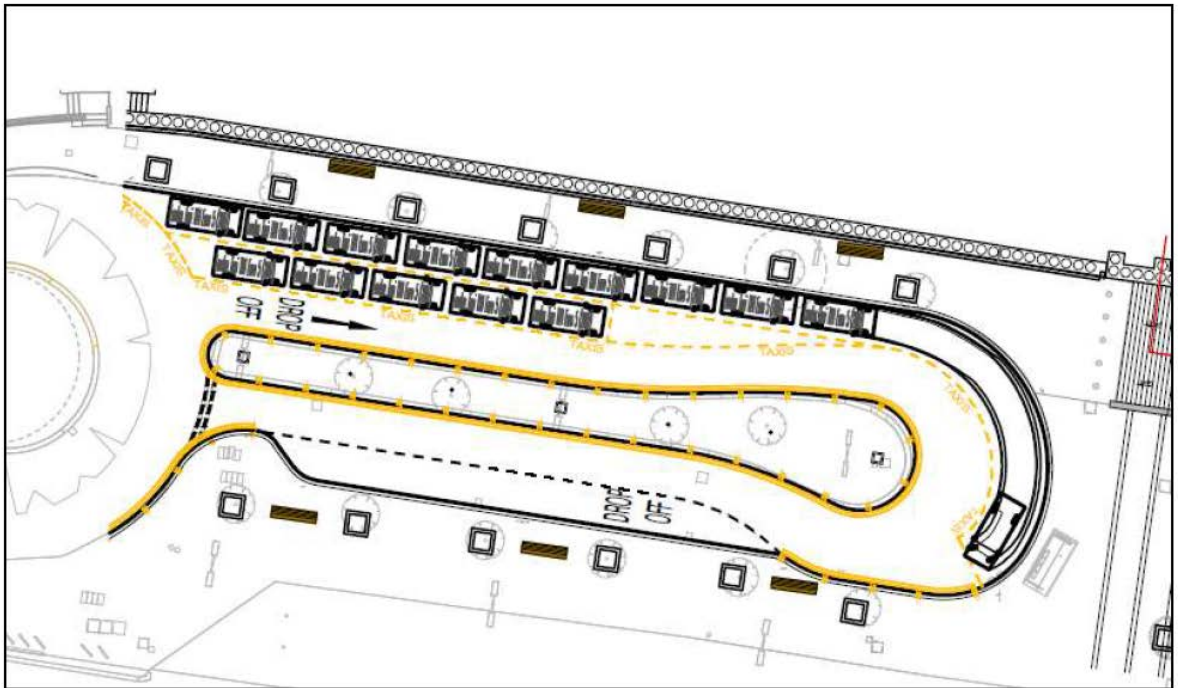
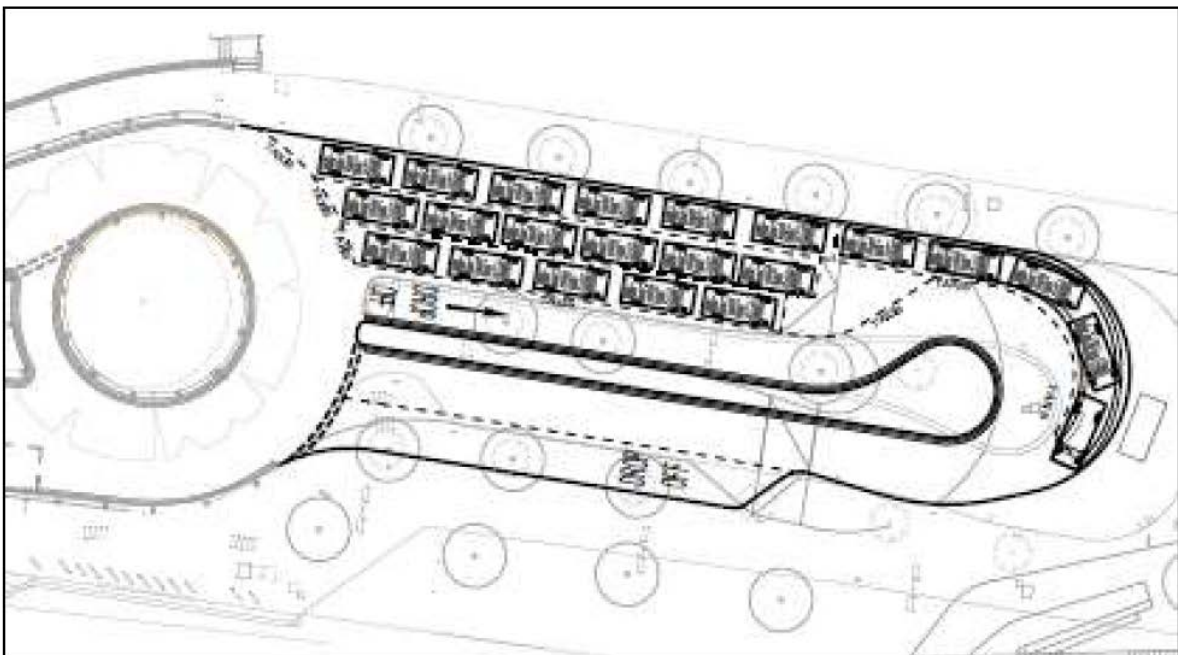


Figure 6.7: Proposed Taxi Rank Capacity (22 Vehicles)



*Given that the proposal increases capacity I am happy that this is acceptable.*

*The proposed alterations to the area north of the site including the pocket park and the taxi rank area will be subject to agreement with RBC Highway Authority by means of a s278 agreement.*

## Trip Generation

### Trip Rates

#### *Extant Consent Comparison*

*Where relevant the assessment methodology for the Development has been informed by the agreed methodology used during the SH3 application to provide a comparison of the transport impact of the Development. This approach has been deemed acceptable.*

*I have reviewed the trips rates specified by the applicant for the residential, retail and office uses and they correspond to the extant permission and therefore are agreed.*

*The applicant has undertaken a dedicated TRICS analysis for the hotel use given that this has not been included previously. I have reviewed the trip rates and these are acceptable as they represent a comparative analysis.*

*To calculate the trip rate associated with the public car park the applicant has obtained traffic data recorded for the existing MSCP. I am happy with this methodology and can confirm that the survey data and associated trip rates for the proposed public parking on the site are acceptable.*

*Although the Transport Assessment identifies how the proposal compares to the extant permission i.e. the difference in trips during the peak periods it has now been clarified how many daily vehicle trips will be generated by the development and how many were consented for the extant permission. This has also included an assessment should the office car parking be used as public car parking out of working hours.*

*The methodology used to calculate the daily trip generation follows that agreed with the applicant and set out within the TA utilising the trip rates from those agreed. This assessment demonstrates that when comparing the extant to the proposed scheme there will be an overall net reduction of 169 two-way vehicle trips across the day.*

*An assessment has been undertaken to determine the impact the use of the office car park as public spaces in the evening would have on the daily trip generation of the scheme. The trip rates have been calculated using the parking surveys of the Garrard Street car park, calculating the trip rates based on the maximum occupancy recorded rather than total capacity to get a robust trip rate. As a worst case, should the office car park (assessed 325 spaces) be open to the public in the evening between 1900 and 0700 it is predicted to generate an additional 110 two-way trips. On this basis, should this be implemented, the overall trip generation of the proposed scheme will still not exceed that of the extant permission.*

*The applicant has reviewed the trip generation details for the AM and PM peak periods and the Net Impact Multimodal Trip Generation (Consented Northern Scheme against Option 3) can be found within the below table.*

<i>Mode</i>	<i>AM Two-Way Trips</i>	<i>PM Two-Way Trips</i>
<i>Pedestrian</i>	-46	-98
<i>Cycle</i>	-28	-42
<i>Bus</i>	-342	-483
<i>Rail</i>	-264	-391
<i>Passengers</i>	+6	+12
<i>Vehicles</i>	+24	+11
<i>Other</i>	+1	-3
<i>Total</i>	-649	-994

*The additional vehicles to the highway network as a result of the proposals will be an increase of 24 two-way vehicle movements during the morning peak hour and 11 two-way vehicle movements in the evening peak hour when compared with the consented scheme. This level of increase in traffic flow during the peak hours would not have a material impact on the surrounding highway network in comparison to the modelled consented scheme.*

*It is also worth noting that the consented scheme included 255 public car parking spaces while Option 3 accommodates for 290 spaces. Therefore option 3 results in a reduction in off-site vehicle trips being displaced to alternative public car parks when compared to the consented scheme. This was presented within the TA as representing a reduction of 18 two-way trips in the AM peak hour and a reduction in 16 two-way trips in the PM peak.*

*The development is therefore considered to be resulting in an increase of 6 vehicle trips in AM peak and reduction of 5 vehicle trips in the PM peak when compared to the consented scheme.*

*Overall the Highway Authority are happy that the development will not have a material increase in traffic on the network and results in significant reductions through the course of the day.*

### *Car Parking*

#### *Phase 2 Car Park*

*Within the Transport Assessment it was originally proposed that 122 car parking spaces were to serve the office accommodated within Plot G during Phase 2. The amended application significantly reduces this number to 70 spaces to accommodate for a revised phasing line.*

*It is proposed that Plot G would eventually have 139 spaces in total (in accordance with RBC's maximum parking standards). Therefore, the applicant proposes 70 spaces within Phase 2 with the remaining 69 spaces proposed within Phase 3 for Plot G office users.*

*The reasoning for this is that the construction phasing of the development limits the ability to deliver the policy compliant level of car parking within Phase 2 from the outset. The policy allowance is already highly constrained and effectively reflects a realistic minimum operational provision. The applicants intend to provide this policy compliant level as soon as possible during or after completion of Plot G. Until the policy compliant maximum office car parking can be delivered (this being heavily restrained as is), the applicant will be required to temporarily manage this car parking shortfall. The Highway Authority have no objection to this.*

*The proposed altered car park access and layouts can be seen on Callison RTKL Drawings 1308 and 1209, I comment on these as follows:*

- Although specific access controls have not currently been designed as these will depend on the eventual occupiers preference, an allowance for a barrier has been accommodated based on guidance within the IStructE 'Design Recommendation for Multi-Storey and Underground Car Parks'. Barriers are required from a security point of view to prevent un-authorised access into the car park. It is envisaged the barrier will likely be controlled by a token fob or remote system. Storage for two vehicles can be accommodated without obstructing Garrard Street. Table 3.2 of 'Design recommendations for multi-storey and underground car parks' states that the maximum capacity for a single-entry lane with no ticket issue and a lifting arm barrier is 550 vehicles an hour. The Highway Authority are satisfied that queues back onto Garrard Street will be avoided.*
- On Level -2 the previous drawings included a 26m long accessible route from the car park to Garrard Street, this ramp has now been replaced by an accessible lift and is deemed acceptable.*

*The gradient of the internal car park ramp has been clarified as 10% and is in accordance with document Design recommendations for multi-storey and underground car parks so is acceptable.*

*It had been requested that clarification be provided on how people parked on Level -1 would get to the building given there is no direct access to the building or lift core from that level. It would appear that a convoluted route is required to a temporary stairwell to the west of the car park or to the lift core to the north of the site which takes you to the external Pocket Park and not within the building core. It is also noted that pedestrians are likely to stick to the parking aisle and therefore will need to cross at the top of the ramp potentially resulting in conflict between vehicles and pedestrians.*

*The applicant has confirmed that this is the case and the only justification provided is that there is no longer a parking aisle on the western edge of Level -1 during Phase 2. This however, does not confirm whether or not an aisle would be provided within Phase 3, nor does it address the need for pedestrians to cross at the top of the ramp. Design recommendations for multi-storey and underground car parks states the following at paragraph 3.4.2 Pedestrian/vehicle conflict:*

*Ideally parking decks should have designated pedestrian walkways, so removing the conflict between pedestrians and vehicles (see Figure 3.23). Although this may give*

*safety benefits there are cost implications. In general, areas requiring special attention are stairs, lifts and running aisles.*

*Paragraph 3.4.3 (Ramps) continues to state the following:*

*Sight lines at the ends of access ramps need particular attention to reduce the risk of accidents at points where conflict between vehicle circulation movements and pedestrian movements can occur (see Figure 3.25).*

*It is noted from the latest drawings that the parking layout at the top of the ramp has now worsened as where a dedicated path was previously provided at the northern end of the car park this is now been replaced with parking.*

*However, during discussions with the applicant it has been agreed that the layout is suitable for office users who will use the car park daily and become familiar with its layout. Should the office car parking be used as evening/weekend spaces for public parking, then a signage and lining scheme should be developed to advise people to walk on the eastern side of the aisle. This scheme can form part of a future Car Parking Management Plan to be conditioned in relation to the use of office spaces to the public during evenings and weekends.*

*It is noted that the floor plans identify a series of pillars proposed to account for the floor levels above and these have now been identified on the car park layouts / podium plans and provide no conflict with the car parking layout.*

### *Phase 3 Car Park*

*Car parking for a maximum of up to 835 car parking spaces is being sought across the overall site (Phase 2 and Phase 3 combined), which is consistent with the overall maximum of 1000 spaces for the previously consented SH3 scheme.*

*It is proposed to access this parking from both Greyfriars Road and Garrard Street with all vehicles exiting onto Garrard Street.*

*The car parking configuration is currently proposed to be across three levels; two levels are as an extension to the Phase 2 podium structure with the addition of a basement level under the entirety of the site. Therefore, up to a maximum of 765 additional car parking spaces could come forward with Phase 3. The exact number and location of these spaces will be provided at the reserved matters stage.*

*As discussed previously, there is a provision for town centre occupiers for a small number of parking spaces within the existing Garrard Street Car Park. Depending on the final level of car parking delivered within Phase 3 there is potential for a number of spaces to be re-provided for town centre occupiers.*

*The allocation of spaces is broadly based on the following table from the Transport Assessment:*

Table 6.5: Parking Allocation by Land Use

Land Use	Parking Ratio
Use Class B1a (offices)	1 space per 250m <sup>2</sup>
Use Class C3 (residential)	0.3 spaces per unit
Use Class A1 and C1 (retail and hotel)	No allocated parking
Public Car Parking Spaces	Remaining capacity to be available to the public
Provision for existing town centre occupiers	0 - 145 spaces*

\* dependant on the final level of car parking delivered

*I have no objection to this as it complies with local and national planning policy.*

### Motorcycle Parking

*Motorcycle parking will be provided in accordance with RBC parking standards, which equates to 2% of the total car parking provision.*

### Phase 2

*For Phase 2 the Development will provide 3 motorcycle spaces to meet the RBC standards. These spaces are to be located on Garrard Street level to minimise the need to use ramps for Motorcyclists which is accepted. The proposed location is deemed acceptable and the spaces comply with the required dimensions.*

### Phase 3

*The parking allocation will vary depending on the land uses that are developed for Phase 3. Based on the current development proposal seeking up to 835 spaces in total this would be 17 motorcycle spaces. Details of this will come forward within future reserved matters applications for the outline elements.*

### Car Club

*A residential car club will be provided to serve the Phase 3 residents. This will provide a minimum of 2 spaces as required by RBC's car club policy and will be secured through the S106. The applicant has now indicated that the car club bays may be located on-street to potentially increase the viability of the car club with it being available to other users when previously it was to be located within the development site. It should therefore be confirmed what the applicant wishes to do and if the bays are to be on-street a drawing will be required illustrating its location.*

*The applicant has suggested that this be dealt with by way of a condition to which I have no objection in principle but I would suggest that this is agreed at the reserved matter stage.*

*I would however stress that although the location of the car club can be dealt with by way of a condition the car club provision itself must be secured through the S106 Agreement.*

### **Disabled Parking Provision**

#### **Phase 2**

*Four spaces are proposed to be disabled bays in accordance with RBC parking standards requirements which states for car parks with up to 200 spaces '3 disabled spaces or 5% of total capacity, whichever is greater' should be provided. These are located at Garrard Street level and will be allocated to the office use of plot G.*

#### **Phase 3**

*The amount of disabled car parking is proposed in line with RBC Parking Standards and varies per development option based on use. I am happy that the exact amount can be detailed within future reserved matters applications for the outline elements.*

### **Electric Vehicle Charging**

*It is proposed that 20% active and 20% passive charging facilities will be provided for the car parking spaces provided as part of the Development proposals which is in excess of the Councils standards and is therefore accepted.*

*The development will provide a range of charging units to accommodate all types of electric cars as the market matures, this will be reviewed when the charging facilities are implemented at the construction phase and the Highway Authority are happy with this approach.*

#### **Phase 2**

*It is proposed that 20% active and 20% passive provision for future electric vehicle charging facilities will be provided as part of the Development proposals. For Phase 2 the scheme will therefore provide 14 active and 14 passive provision charging bays. Drawings SHRN-CRL-S2-P1-DR-SK-9211 and SHRN-CRL-S2-P2-DR-SK-9212 indicate the location of the active and passive spaces and this is acceptable.*

#### **Phase 3**

*For Phase 3 the scheme will provide up to 167 active and 167 passive car parking facilities based on the maximum 835 spaces sought, however a minimum of 72 active electric charging facilities must be provided for Phase 3. Details of which will come forward within future reserved matters applications for the outline elements and the Highway Authority is happy with this approach.*

### **Car Parking Displacement**

#### **Phase 2**



*There will be an immediate loss of public car parking during construction once the Garrard Street MSCP is demolished, and this will not be re-provided by the development in Phase 2.*

*A survey of the use of Garrard Street Multi-Storey Car Park was undertaken on 16th October 2018 which recorded the maximum occupancy throughout the day as being 641 vehicles (this includes the existing town centre occupiers).*

*During Phase 2 there will be potential for 641 cars to be redistributed to surrounding public car parks based on the Development not providing for public car park user and the existing occupiers.*

*A survey undertaken reviewing the available capacity of public car parks around Reading was undertaken by Richard Talbot Consultancy Ltd in December 2018 with the results presented in The Transport Assessment. This showed that there were 1,505 available public car parking spaces within a 10 minute walk of the site which is sufficient to accommodate for this displacement of up to 641 cars.*

*It is worth noting that there is potential for the Phase 3 site area to be used in the short term for public car parking while Phase 2 is operational. Should this come forward as an interim use before the Phase 3 area is developed it would be proposed through a separate temporary planning application. This would reduce the amount of public car parking displacement elsewhere within the local public car parks.*

*It is also proposed that the office car parking spaces could be used as public spaces in the evening on weekdays and at weekends when capacity is available within the car park. It has been stated that the car park public operation and management would be developed to account for the preference of the future occupier. The car park would only be available to the public outside core hours. An option would be that a car parking space would need to be booked in advance, with people provided with a QR code as an example to enable them to access the car park. The applicant has accepted that a planning condition to develop a public car parking management plan prior to occupation could be accommodated so that a suitable strategy could be developed in the future to account for the ultimate tenants needs. I am happy with this approach.*

### Phase 3

*The total car parking capacity for Phase 3 is up to a maximum of 835 spaces. It is stated that the proposed car parking be allocated by land use as set out previously in Table 6.4 of the Transport Assessment but Table 6.4 is a breakdown of the spaces provided per floor for Phase 2. It is therefore assumed that this refers to Table 7.4 below.*

Table 7.4: Proposed Total Illustrative Development Options (including outline and detailed aspects)

Option	Residential Units	Office (GIA sqm)	Retail (GIA sqm)	Hotel (number of rooms)	Public Car Parking	Displaced Public Car Parking
1	539	77,259	3,492	0	219	277
2	750	74,259	3,492	0	199	297
3	250	81,259	3,492	450	290	286

*The car parking allocation by land use in each illustrative option is provided in Table 6.7. Details of the exact parking provision will come forward within future reserved matters applications for the outline elements.*

Table 6.7: Proposed Phase 3 Total Car Parking Provision

Option	Plot C Office	Plot G Office	Plot A/B Residential	Existing Occupiers	Public Spaces	Total	Displaced Public Spaces
1	168	141	162	145	219	835	277*
2	156	141	194	145	199	835	297*
3	184	141	75	145	290	835	206*

\*Displaced car parking allows for all car users associated to the hotel to use the public spaces.

*The above is deemed acceptable.*

*I note that Technical Note 15 has been produced to understand what provision would be required for a hotel use however I have not assessed this in any great detail given that the hotel is located within the town centre area, no parking is to be allocated to the hotel and a total provision of public parking is proposed which is in excess of the maximum parking provision specified in the Councils SPD.*

### Delivery and Servicing

*The site-wide delivery and servicing strategy has been developed utilising a combination of on-street loading facilities and an internal service road and yard.*

*A Technical Note has been provided to assess the number of servicing trips that would be generated by the development.*

#### ➤ Phase 2 Office

*The Technical Note has identified, from a survey of the servicing arrangements for the adjacent Thames Tower building, the number of servicing trips associated with an office use. The number of trips servicing Thames Tower was then grown to the proposed office quantum (34,736sqm) based on Thames Tower having a floor area of 24,160sqm to inform the potential future service vehicle generation of the office use proposed within Plot G. In principle I have no objection to this approach.*

*To prevent an overestimate of the number of service vehicles generated the applicant reviewed the survey video footage to identify whether any of the future visits could be consolidated in the future. These vehicle trips were then estimated as having the potential to serve Thames Tower and Plot G rather than two separate movements.*

*Following previous concerns from the Highway Authority the applicant has reviewed this survey data and applied a "worst case" scenario calculation of trips being consolidated where it was deemed that only refuse vehicles and milk floats to be consolidated for both buildings. This is now deemed accepted.*

*Based on this methodology the estimated servicing trips associated with the Phase 2 office is 36 service vehicle trips per day.*

➤ *Phase 2 Retail*

*Service Vehicle retail trips were assessed using the Trip Rate Information Computer System (TRICS) online database which is considered acceptable. Revised TRICS data has been provided based on previous comments and this has been reviewed and deemed acceptable.*

*The applicant has also undertaken an assessment to confirm that restaurants would provide a higher number of servicing trips than a non-food retail use and therefore this is accepted.*

*Following clarity, the Highway Authority are happy that the applicant has not included Light Goods Vehicles (LGVs) within the assessment.*

*This use would therefore generate a provision of 6 service trips per day.*

➤ *Phase 2 Summary*

*As the servicing and delivery associated with Plot G is proposed to take place in a managed servicing area to be shared with the existing Thames Tower, the existing service and delivery trips for Thames Tower have been included within the assessment to show the anticipated total use of the servicing area.*

*As shown below in Table 2.3 the total number of trips per day generated by the proposed uses and the existing Thames Tower office is 69. During a 12 hour period this equates to 6 vehicles per hour using the service area during Phase 2. However, it should be stated that this does not take into account the shared servicing trips agreed above which would reduce this to 67 service trips per day.*

Table 2.3: Phase Two Service and Delivery Trip Generation

Phase 2	Area (sqm)	One way Service Trips per day
Office	34,736	36
Retail (Restaurant)	1,174	6
Thames Tower	24,160	27
Total		69

*Given the level of servicing bays proposed for Plot G and that the servicing trips would be spread over the course of the day as is highlighted by the survey undertaken for Thames Tower I am happy that these servicing operations could be accommodated on site and not impact the Public Highway.*

➤ **Phase 3 Office**

*Service Vehicle trip generation for office use in Phase Three uses the same methodology as used in the Phase Two Office assessment set out previously. Table 3.1 provides a summary of the service and delivery trip generation for the office use by option.*

Table3.1: Phase Three, Office Service and Delivery Trip Generation

Option	Area (sqm)	One-way Service Trips per day
1	42,000	43
2	39,000	40
3	46,000	48

➤ **Phase 3 Residential**

*Service Vehicle trip rates for the residential use are based on the TRICS online database. Sites were selected based on all the available private residential flat sites within a town centre. It should be noted, that selecting all sites within a town centre on TRICS will ensure the trip rates used are robust. The Highway Authority are happy with this assessment which identifies the below level of servicing trips.*

Table 3.2: Phase Three, Residential Service and Delivery Trip Generation

Option	Number of units	One-way Service Trips per day
1	539	33
2	750*	47
3	250	16

\*Based on the maximum residential sought within the outline application rather than the illustrative development mix.

➤ *Phase 3 Hotel*

*Following clarity, the Highway Authority are happy that the applicant has not included Light Goods Vehicles (LGVs) within the assessment. The level of servicing identified in the table below is therefore accepted.*

Table 3.3: Phase Three, Hotel Service and Delivery Trip Generation

Option	Hotel Rooms	One-way Service Trips per day
3	450	7

➤ *Phase 3 Retail*

*The proposed area of retail 2,500sqm (GIA) is the same for all development options. The same methodology for the Phase 2 assessment was used ('town centre' restaurant) and this is presented in Table 3.4.*

Table 3.4: Phase Three, Retail Service and Delivery Trip Generation

Option	Area <sup>2</sup> m	One-way Service Trips per day
All Options (1, 2 and 3)	2,500	12

*The Highway Authority are happy with this assessment.*

➤ *Phase 3 Summary*

*In line with the above the proposed total number of servicing trips associated with Phase 3 is as per Table 3.5 below:*

Table 3.5: Phase Three Total Delivery and Servicing Trips

Northern Scheme	One-way Trips Per Day
Option 1 Total	88
Option 2 Total	99
Option 3 Total	83

*The total Station Hill North Scheme includes both Phase Two and Phase Three and the existing Thames Tower operation. Table 4.1 sets out the total number of service and delivery trips associated with each of the illustrative development options, using the methodology set out in the submitted Technical Note.*

Table 4.1: Total Station Hill North Scheme

Northern Scheme	One-way Trips Per Day
Option 1 Total	157
Option 2 Total	168
Option 3 Total	152

*Given the above the Highway Authority are happy that the assessment undertaken on the servicing numbers is acceptable.*

#### Service Road and Yard

*The service Road and yard will be constructed in Phase Two and will serve the office and retail uses in Phase Two and Phase Three. When the service yard is operational the existing Thames Tower operations will share the use of the service area with the proposed office and retail uses. Therefore, servicing trips for Thames Tower included within the survey previously referenced have been included in the calculations presented to show the total use of the service area.*

*For the purpose of this assessment the most robust scenario has been presented (adapted based on RBC's request), which is Option Three as it has the highest number of vehicles utilising the service yard and road.*

*The service and delivery vehicle trips for the total office and retail use provided across Phase Two and Phase Three is set out below.*

Table 5.1: Total Station Hill North Scheme Service Yard (per day)

Service Yard	GIA (sqm)	One Way Vehicle Trips Per Day
Office	80,716	84
Retail	3,674	18
Sub total		102
Thames Tower		27
Total With TT		129

Table 5.2 below sets out the average hourly use of the service area based on a 12-hour operational period rounded up.

Table 5.2: Station Hill North Scheme Service Yard (per hour)

Use	Hours	Vehicles Per Hour
Office	12	7
Retail	12	2
Total		9
Thames Tower		2
Total with Thames Tower		11

The existing Thames Tower delivery profile has been factored to create a delivery profile for the Station Hill Northern Scheme. The delivery profile has been derived from categorising entry and exits into hourly segments, whilst an estimated maximum occupancy within an hour has been included into the calculation through the average estimated dwell time of 25 minutes per vehicle. This has been calculated from the Thames Tower survey, which admittedly includes vehicles parked/dwelling for significant periods that increases the average dwell time. As such, the calculated number of delivery and service vehicle utilising the service bays at a given time within an hour is estimated by factoring down the number of arrivals by the average dwell time. This has been presented below within Figure 5.1.

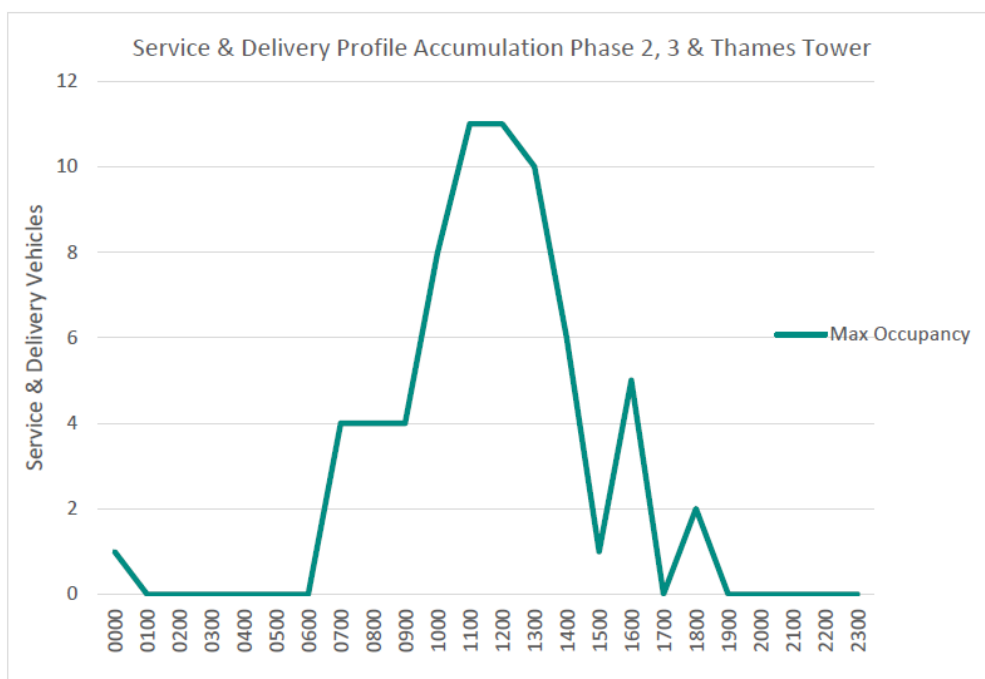


Figure 5.1 Phase 2, 3 & Thames Tower Combined Service & Delivery Profile Accumulation

*For clarity the service yard assessment includes the following:*

- *A worst case scenario of minimal delivery consolidation between Thames Tower and the Station Hill North Scheme,*
- *A robust trip rate assessment,*
- *Use of Option 3 as the scheme generating the largest use of the service area,*
- *A 25 minute dwell time,*
- *Consideration that the service yard is to serve the proposed Office, Retail and existing Thames Tower usage and;*
- *No delivery booking or management,*

*With this taken into account it is estimated that 11 service or delivery vehicles will occupy the service yard within the peak profile hour of the Phase 2 & Phase 3 scheme combined. These 11 vehicles can be accommodated within the service road, service yard and bay outside Thames Tower during this eventuality.*

*The Highway Authority are therefore satisfied that a robust assessment has been undertaken that confirms that the number of servicing bays proposed is sufficient to meet the needs of the office and retail uses.*

*I have reviewed the proposed delivery and servicing locations and comment as follows:*

#### *On-street Loading*



*It is proposed that three on-street loading facilities will be provided; one on Greyfriars Road adjacent to Plot A and two along Garrard Street, one adjacent to Plot B/D and one adjacent to Plot G.*

*The layby to the south of Plot G is to be delivered within Phase 2 and is off carriageway. This will be used to facilitate the drop off and collection of staff and visitors and has been deemed acceptable.*

*The layby on the western end of Garrard Street and layby on Greyfriars Road are proposed to support the uses within Phase 3. These facilities are to serve the adjacent Plots A/B/D and provide a location for servicing, deliveries and refuse collection.*

*The applicant has now provided information that takes account of the proposed on site turning areas associated within the service yard for Thames Tower and the existing on street servicing for Xafinity House that the proposed use of the Garrard Street loading bay would not worsen the existing situation and this is accepted by the Highway Authority.*

*Tracking diagrams have now been provided to identify a vehicle accessing and egressing this bay but in reviewing this drawing it is noted that the loading bay is to partly protrude into the carriageway. If this is the case the kerb line should be adjusted to suit and it should not be addressed by lining. A revised scheme has been provided to include alterations to the kerb line which is acceptable and will form part of the Highway Works.*

*The location of the loading bay on Greyfriars Road is situated 12m from the junction with Tudor Road and this has not been relocated as a result of previous comments but has been redesigned as a loading bay.*

*The service bay design is identified on Drawing 44470/5502/SK/53 and I am happy that the proposed design allows for sufficient space for a delivery vehicle as well as including acceptable design criteria for the advisory cycle lane and adjacent footway.*

#### *Service Road and Yard*

*The service road to the east of the Development currently facilitates exit from the MSCP and is used for vehicle servicing of Thames Tower. The Development proposes alteration to the existing road between the MSCP and Thames Tower and removal of the central columns supporting the car park pedestrian access above. This area is to become a service zone accommodating parallel loading bays and deliveries in the space between the buildings.*

*It is also proposed to provide an additional internal loading bay for smaller HGV's and a turning head for lorries up to 10m in length, this could also accommodate a large refuse vehicle to turn.*

*This private loading facility will be managed as part of the Development's estate management function and will be co-ordinated and shared with Thames Tower's operation. It is proposed that the servicing facility be delivered in Phase 2 and as*

*currently envisaged will ultimately serve the office and retail of Plot G (Phase 2) and Plot C (Phase 3) plus podium level retail and Thames Tower. The shared service zone includes:*

- A service yard within the podium for small HGV's such as a HGV Panel Van and a turning head for 10m HGV's (also allows for the turning of a large refuse vehicle);*
- A service zone adjacent to Plot G capable of accommodating larger HGV's (including articulated lorries) reversing from Garrard Street and vehicles entering the service road in a forward gear (able to accommodate up to 6 HGV Panel Vans);*
- An expanded service zone adjacent to Thames Tower (able to accommodate up to 3 HGV Panel Vans);*

*On site tracking for the articulated vehicle identifies that approximately two thirds of the loading bay would be required to ensure access and as such this will render the bay unusable for the duration of the delivery and the time leading up to it. However, the development is not expected to generate many if any vehicle movements by articulated vehicles. As such the Highway Authority are happy that the scheme has been designed to provide flexibility so as not to prohibit the need to have deliveries occur by articulated lorries in certain instances. In the instance a tenant was to arrange a delivery via an articulated vehicle this would be scheduled to occur outside of peak occupancy and the appropriate level of bays and corresponding dwell time scheduled.*

*The service yard area provides a turning head and space for one vehicle to load/unload at the northern boundary of the site. This area will be managed so that a vehicles can turn on-site. It is not proposed that two vehicles will occupy this area at the same time. Given the maximum number of delivery trips within an hour and the potential for this being reduced to accommodate a managed on site strategy the Highway Authority is happy with this approach.*

*As a result the swept path analysis of the service area shown on Drawing 44470/5502/TA/04 is acceptable.*

*It is proposed that the servicing zone will be controlled through a booking system to be managed by the estate management team to balance trips across the day and to prevent congestion within the facility. On the basis the facility is operational for only 12 hours (07:00 to 19:00) but acknowledging this could be greater, this would be 8 vehicles an hour.*

*Given that it has now been agreed that the servicing area can accommodate the required level of servicing agreed the Highway Authority are happy that this can be controlled through a servicing management plan.*

*The design of the Phase 3 Plots will evolve with the exact location of points of access for servicing to be developed as the design develops and subsequent Reserved Matters come forward. An extract from CRTKL Drawing SHRN-CRL-S2-P1-PL-A-1308 shows how an access corridor has been included within the scheme so that access to the Service Yard can be developed to the Phase 3 plots and is deemed acceptable in principle.*

## Waste

### ➤ Phase 2 Waste

*Plot G accommodates a waste storage area within the podium adjacent to the service road. Access between the storage area and the service road is level with a manual handling distance of 12m.*

*The waste storage area has been designed to accommodate 31 bins which would require collections three times a week for the retail and office waste generation associated with Phase 2. This doesn't account for the potential use of compactors that could reduce the space required. Following the submission of further clarification, the Highway Authority is satisfied that this is sufficient to serve the development.*

### ➤ Phase 3 Waste

*As Phase 3 of the development is currently seeking outline permission the specific number of bins and size of storage area will be developed, in consultation with RBC, during forthcoming reserved matters applications.*

*As discussed earlier the office and retail elements of Phase 3 will be serviced by the service zone provided within Phase 2. The residential/hotel uses are expected to be serviced from the adjacent loading bays.*

*The residential waste stores are expected to be located within an acceptable manual handling distance of the loading bays to enable suitable collection distances. This will be the same case for a hotel if it is forthcoming at the reserved matters stage.*

*It has been stated that an appropriately sized waste storage area for the office and retail uses within Phase 3 will be located within a suitable distance of the shared service yard. The waste will be transferred from the Phase 3 plots via a lift provided within Plot C. The waste would then be transferred to the service yard within Phase 2 for collection only. The Phase 3 waste will therefore not be stored within the Phase 2 area but only collected from that Phase. A drawing has been provided that illustrates 30 eurobins indicatively stored within the service yard for collection. This is the estimated volume of recycling generated based on three collections a week for the Phase 3 Office and Retail. There is ample space within the service yard to accommodate for the anticipated maximum level of refuse collection and therefore this is accepted.*

## Station Hill Plaza Vehicular Access and Emergency Access

*It is intended that Station Hill Plaza will be pedestrianised as this forms a key part of the public realm improvements with vehicular access limited to emergency vehicles as is stipulated within the planning permission for Plots E & F.*

*Swept path analysis of a fire tender has been provided for movements to and from Friar Street and circulating Station Hill Plaza and these are acceptable.*

*The applicant has stated that they would want vehicles associated with maintenance and the possible installation of temporary events within the Station Hill Plaza to also utilise access from Friar Street but the Highway Authority have concerns regarding this operation. Given that the permission for Plots E & F only permits vehicle access for emergency vehicles any access issues for temporary events should be dealt with as part of a separate application.*

*It is stated that Drawing 44470/5502/TA/10 shows Fire Tender access to the control room within Plot G accessed from the service zone however the drawing specified does not show any access by a fire tender to the service zone accessed from Garrard Street. However, given that a fire tender manoeuvre would be less onerous than the service vehicle manoeuvres shown on drawing 44470/TA/04 this is deemed acceptable.*

*Although some revisions are still required to the scheme I propose the following conditions.*

### Conditions

#### *Full Permission*

*C2 CONSTRUCTION METHOD STATEMENT (TO BE SUBMITTED)*

*DC1 VEHICLE PARKING (AS SPECIFIED)*

*DC3 VEHICULAR ACCESS (AS SPECIFIED)*

*DC5 CYCLE PARKING (AS SPECIFIED)*

*DC8 REFUSE AND RECYCLING (AS SPECIFIED)*

*DC10*

*ACCESS*

*CLOSURE WITH REINSTATEMENT*

*DC13*

*MAINTENANCE OF VISIBILITY SPLAYS*

*DC22*

*DELIVERY*

*AND SERVICING MULTI-UNIT (TO BE APPROVED)*

#### *EV CHARGING POINTS*

*No dwelling within a Plot shall be first occupied until the Scheme for that Plot has been fully provided with electric charging facilities in accordance with the approved details. The spaces shall be maintained for vehicle charging in accordance with the approved Scheme at all times thereafter.*

*REASON: In the interests of environmentally sustainable transport in accordance with Policy TR3 and TR5 of the Reading Local Plan 2019.*

#### *SET BACK OF BARRIERS*

*Any barriered access provided shall open away from the highway and be set back a distance of at least 11 metres from the nearside of the carriageway of the adjoining highway in accordance with drawing SHRN - CRL - S2 - P2 - DR- SK - 9212.*

*REASON: To ensure that vehicles can be driven off the highway before the gates are opened, in the interests of road safety in accordance with Policy TR1 and TR3 of the Reading Local Plan 2019.*

*Outline Permission*

*C2 CONSTRUCTION METHOD STATEMENT (TO BE SUBMITTED)*

<i>DC10 CLOSURE WITH REINSTATEMENT</i>	<i>ACCESS</i>
<i>DC20 PERMITS 1</i>	<i>PARKING</i>
<i>DC21 PERMITS 2</i>	<i>PARKING</i>

*VEHICULAR ACCESS (AS SPECIFIED)*

*The vehicle access located on Greyfriars Road shall be provided with two lanes and retained as a point of access only and not utilised for means of exiting the site in accordance with drawing 44470/5502/SK041 hereby approved.*

*REASON: In the interests of road safety in accordance with Policy TR1 and TR3 of the Reading Local Plan 2019.*

*SET BACK OF BARRIERS*

*Any barriered access provided shall open away from the highway and be set back a distance of at least 21.4 metres from the nearside of the carriageway of the adjoining highway in accordance with drawing 44470/5502/SK041.*

*REASON: To ensure that vehicles can be driven off the highway before the gates are opened, in the interests of road safety in accordance with Policy TR1 and TR3 of the Reading Local Plan 2019.*

*S106*

*Contribution towards improvements to the station underpass to make it suitable to accommodate pedestrians and cyclists. A contribution of £200,000 is therefore sought.*

*The applicant should subsidise a Car Club for the development consisting of two cars for a period of 5 years.*

*Within 6 months of commencement of development the applicant should enter into a S278 /38 Agreement to facilitate alterations to the Highway that include but is not limited to the following:*

- The cycle facilities along Greyfriars Road and alterations to the signalised junctions on Friar Street.*
- Alterations to the radii at the junction of Greyfriars Road and Tudor Road*
- Closure of existing vehicle accesses*

- *Creation of new accesses into the development*
- *Pedestrian crossing facility on Garrard Street*
- *Raised table crossings at the junction of Garrard Street and Greyfriars Road and the new site access onto Greyfriars Road.*
- *Creation of the Pocket Park*
- *Alterations to the taxi rank located at the south western interchange*
- *Provision of loading bays*
- *Alterations to the on street pay and display bays*
- *Temporary footway until Phase 3 is progressed*

*These works are likely to require two separate phases within the Highways Agreement and discussions are ongoing as to what works will come forward within each phase.*

*No development within a phase should be occupied until the works for that Phase have been completed to the satisfaction of the Local Highway Authority.*

*The applicant should enter into a S142 licence to maintain the pocket park."*

#### **4.5 Lead Flood Authority (RBC Highways)**

*"The SuDS proposals contained within the submitted documents include a significant reduction in run off rate for the 1 in a 100 year with 40% climate change event and in principle is deemed acceptable. No details have been provided for the 1 in 1 year event which should also not be any worse than the existing discharge rate but this can be dealt with by way of a condition requiring the detailed layout to be submitted confirming this.*

*Confirm no objections subject to the below conditions.*

*Standard condition SU7 Sustainable Drainage details to be submitted for approval*

*Standard condition SU8 SuDS to be implemented as approved."*

#### **4.6 RBC Waste Operations**

*No objection received*

#### **4.7 RBC Environmental Protection (EP):**

*Confirm no objection in principle.*

*"Noise impact on development*

*The submitted noise assessments (Dec 2019) propose suitable glazing and ventilation for the new dwellings (and other building uses) in order for suitable internal noise levels to be achieved).*

*The assessment for the outline application provided indicative glazing specification only.*

*EP recommend the following conditions.*

#### *Internal Noise*

*For outline: (N9) NOISE ASSESSMENT & MITIGATION RESIDENTIAL (TO BE SUBMITTED)*

*For full: (N10) NOISE MITIGATION SCHEME (AS SPECIFIED) in accordance with the specifications recommended within the Noise Assessment submitted with the application [Hoare Lee, Phase 2 Assessment, Dec 2019].*

#### *Noise - delivery hours / waste collections*

*Further information will need to be submitted regarding locations and timings for deliveries and waste collections as EP have concerns about the potential for noise disturbance due to deliveries and/or waste collections and/or commercial operations on occupants of nearby residential properties, particularly late at night and early morning.*

*Conditions similar to those imposed on 190441 are recommended: Details of service vehicle hours/waste arrangements and management for each plot to be submitted for approval. The previous restriction (under 190441) on hours of servicing from Garrard St is less relevant as the new design incorporates an off-site loading area.*

#### *Noise generating development*

*Applications which include noise generating plant when there are nearby noise sensitive receptors should be accompanied by an acoustic assessment carried out in accordance with BS4142:2014 methodology.*

*Plant noise limits have been proposed within the noise assessment, however because the details of the plant and locations are not yet known, the following condition is recommended for the detailed and the outline applications:*

*(N2) MECHANICAL PLANT (NOISE ASSESSMENT REQUIRED)*

#### *Kitchen Extraction - odour*

*In addition to concerns about noise (as discussed above), 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).*

*The following condition is recommended: [N11] ventilation & extraction (to be submitted)*

#### *Air Quality*

*EP have concerns about the air quality assessment in terms of the predicted levels in the future, which affects both prediction of the development's impact on air quality and the predicted levels of NO<sub>2</sub> at the new residential receptors.*

*EP does not accept the model as currently presented due to:*

- i) overstated reduction in nox (only 6 years in the future)*
- ii) unknown and unmeasured canyon effect and not using the most local weather station data means microclimate effects are uncertain in their model. Much higher localised nox levels suggested by local diffusion tubes and not proven otherwise.*
- iii) Discrepancies between modelled and measured data in the immediate vicinity of the site.*

*The developer has been advised previously of the concerns. In the light of these concerns EP recommend a condition requiring further detailed assessment including canyon effect modelling, updated weather data and re-calibration of model to better fit with local diffusion tube readings.*

*Standard Condition N13 adjusted to suit site-specific circumstances:*

*"No development shall commence on site until a detailed Air Quality Assessment to determine whether mitigation is required to protect the residents from the effects of poor air quality is submitted to and approved in writing by Local Planning Authority. The assessment must include: canyon effect modelling, up to date local weather data calibration of the model to better fit with local diffusion tube readings. It should include an assessment assuming no improvement in air quality at the time of the development being occupied. Where this Air Quality Assessment identifies that future residents will be exposed to poor air quality, an air quality mitigation scheme shall accompany this assessment demonstrating sufficient mitigation to protect the occupants. The scheme shall be implemented as approved prior to occupation of any part of the development and retained as approved at all times thereafter."*

#### *Air Quality - Increased emissions*

*Standard Condition N15: Air quality assessment to be submitted. Adjusted to suit site-specific circumstances:*

*"No development shall commence on site until an Air Quality Assessment to determine whether the proposed development will result in a worsening impact on air quality has been submitted. The assessment must use a full dispersion model to predict the pollutant concentrations at the building façade for the proposed year of occupation as well as any impacts during the development phase. The input parameters used in the assessment must be in accordance with current best practice."*



*The assessment must include: canyon effect modelling, up to date local weather data calibration of the model to better fit with local diffusion tube readings. It should include an assessment assuming no improvement in air quality at the time of the development being occupied. Where the assessment identifies a worsening of air quality, a mitigation plan shall be submitted to and approved in writing by Local Planning Authority. The mitigation plan must quantify the impact on emissions the proposed mitigation will have, in order to demonstrate that any detrimental impact from the development will be offset. Thereafter, the development shall not be carried out other than in accordance with the approved mitigation scheme, which shall be implemented before any part of the development is occupied."*

#### *Contaminated Land - high risk sites*

*The site investigation for the north site (Ramboll, Aug 2019, 1620004716) has identified some areas of contamination (hydrocarbon vapour, asbestos, benzo-a-pyrene), and identified a level 2 risk from ground gas. Further investigation has been recommended once the demolition has taken place in order to fully characterise the contamination and therefore finalise the risk assessment and proposed remediation. Recommended conditions below are required to ensure that future occupants are not put at undue risk from contamination.*

<i>Standard Condition CO3</i>	<i>Contaminated Land Assessment to be submitted</i>
<i>Standard Condition CO4</i>	<i>Remediation Scheme to be submitted</i>
<i>Standard Condition CO5</i>	<i>Remediation Scheme Implementation and Verification</i>
<i>Standard Condition CO6</i>	<i>Reporting of previously unidentified contamination</i>

#### *Land Gas. Site investigation*

*Condition: No development [other than demolition] shall take place until a detailed land gas site investigation to be carried out and remediation approved and implemented.*

#### *Light*

*EP have concerns about lighting resulting in loss of amenity to nearby residents. Insufficient information has been provided for EP to assess whether the proposed lighting scheme is likely to adversely impact on nearby residents.*

*Standard Condition N19 External Lighting details to be submitted*

#### *Construction and demolition phases*

*EP have concerns about potential noise, dust and bonfires associated with the construction (and demolition) of the proposed development and possible adverse impact on nearby residents (and businesses). Fires during construction and demolition can impact on air quality and cause harm to residential amenity. Burning of waste on site could be considered to be harmful to the aims of environmental sustainability. Recommended conditions:*

*Standard Condition C1 Hours of Construction and Demolition*

*Standard Condition C2 Construction Method Statement to be submitted - to include controls on noise dust, dirt and other airborne pollutants during demolition and construction noise coming from the site during demolition and construction and full details of pest control measures including, capping of drains/sewers and baiting arrangements.*

*Standard Condition C4 No bonfires during construction/demolition.*

*Bin storage - rats*

*EP advise that there is a widespread problem in Reading with rats, which are being encouraged by poor waste storage which provides them with a food source. It is important for all bin stores to be vermin proof to prevent rats accessing the waste. EP recommend the following condition.*

*"No [dwelling/development] hereby permitted shall be first occupied until details of refuse and recycling bin stores have been submitted to and approved in writing by the Local Planning Authority. The details shall include measures to prevent pests and vermin accessing the bin store(s). The approved bin storage, including pest and vermin control measures, shall be provided in accordance with the approved details prior to first occupation of any permitted [dwelling/development] and shall not be used for any purpose other than bin storage at all times thereafter."*

**4.8 RBC Valuers**

The proposals have been assessed by BPS Surveyors on behalf of the Council's Valuer. Their findings are addressed in the S106 and Affordable Housing and Viability sections of this report.

**4.9 RBC Leisure**

No objection received.

**4.10 RBC Planning (Natural Environment) (Tree Officer) (Summary)**

"The landscaping details for Phase 3 are very 'in principle' giving loose ideas of what will be included. However, as landscaping is not being considered in detail, the acceptance of the principles will have to be sufficient. As indicated, it should be ensured that the landscaping ultimately links into that approved for Phase 2.

In respect of Phase 2

Revised plans have been submitted showing suitable tree and shrub planting within the site.

We will need to secure:

- Services (existing and new), including lighting and CCTV
- Tree pit / planter details
- Plant establishment details
- Landscape Management Plan and compliance with

- Implementation (and timing of) approved landscaping
- Biodiversity enhancements (unless these have been agreed already)
- Hard landscape plans
- Arboricultural Method Statement

The tree species for Greyfriars Road will need careful selection to cope with the urban environment and avoid dropping debris on the street.

Phase 3 Outline element. This is very indicative hence all details will need to be secured by condition to be submitted at Reserved Matters stage."

#### 4.11 RBC Ecologist

*"This development is unlikely to have any adverse impact on protected species and there should be no ecological constraints to the proposals. As such there are no objections to this application on ecological grounds but should the application be approved it is recommended that, in addition to any landscaping conditions, the following conditions be set (you should ask the applicant to confirm the area that the new green roofs will cover and refer to it in this condition):*

*CONDITION: No development shall commence on site (including demolition or preparatory works) until details of a habitat enhancement scheme are submitted to and approved in writing by the Local Planning Authority. The scheme is to include a minimum of ten swift bricks and full details of biodiverse green roofs that are to cover a minimum of XXM2 be installed on the new building. It shall include a programme for implementation and ongoing maintenance. The habitat enhancement scheme shall thereafter be implemented and adhered to in accordance with agreed programme."*

#### 4.12 Berkshire Buckinghamshire and Oxfordshire Wildlife Trust

No response received

#### 4.13 RBC Sustainability Manager

*The proposals have been subject to lengthy discussions between Planning officers, the Council's Sustainability Manager and the Council's sustainability advisers, Element Energy Ltd. The outcome of these discussions is reflected in the Sustainability section of this report.*

#### 4.14 Berkshire Archaeology:

*This application is accompanied by an ES (December 2019), which is 'a full update of all previous ESs' (Paragraph 1.17). Chapter 9 addresses the historic environment, including archaeology, and has been updated to reflect recent archaeological work south of the application area, in Plots E and F (Oxford Archaeology, 2019).*

*The document provides for archaeological investigations post demolition and pre construction within the application area (Paragraph 6.13. and 9.62). This accords with previous proposals for the wider Station Hill development as set out in the previously approved 'Overarching Archaeological Written Scheme of Investigation' (OAWSI) prepared by Waterman in relation to applications 130436, 151426 and 151427. The programme of archaeological work will normally commence with an*

*exploratory field evaluation which will establish if and what further archaeological mitigation measures are required.*

*On this basis, Berkshire Archaeology recommends that, should this proposal be permitted, appropriate conditions are applied that reflect the previously agreed approach to mitigating the archaeological impacts of the Station Hill development. The following conditions are suggested:*

*Condition 1: 'The development will be undertaken in accordance with the 'Overarching Archaeological Written Scheme of Investigation (Waterman, October 2019) in order to mitigate the impacts of development on the buried archaeological heritage'*

*Condition 2: 'No development, other than demolition to ground level, shall take place within any Plot of the development until a written scheme of investigation for a programme of archaeological work, specific to that Plot has been submitted to and approved in writing by the local Planning Authority. Thereafter, the development of the phase shall only be undertaken in accordance with the approved scheme'."*

**4.15 RBC Emergency Planning Manager**

No objection to the principle of the development.

Request details of blast resistant glazing to lower storeys, Hostile Vehicle Mitigation measures to the public realm and details of CCTV provision to be secured by condition.

**4.16 Crime Prevention Design Advisor (Thames Valley Police):**

Consider that the proposal is capable of appropriate security measures but these have not been finalised under the current proposals. Conditions are therefore recommended as follows:

**Condition.** *Security/Anti-Crime Management Plan to be submitted for approval prior to construction above ground level in accordance with the 'Secured By Design' standard to include:*

*i) Hostile Vehicle Mitigation to all potential public realm vehicle access points unless otherwise agreed within the submitted Plan.*

*ii) Electronic access controlled rising arm barrier and attack rated roller shutter for out of hours access to basement car park entrances [hours to be agreed].*

*iii) Electronic access controlled rising arm barrier and attack-rated roller shutter to service yard. The shutter to be in operation at all times.*

*iv) Blast-resistant laminate glazing to BSEN 12600 and frames to BS6262 for at least the first 3 storeys above adjoining street level. Curtain wall glazing to be BS EN 356-2000 (P1A) or engineered equivalent.*

*v) A detailed blast analysis of main glazing elements (glass and frame) and building structure to confirm their blast-resistance. AND any redesign, full-scale*

*blast test on samples if risk of glazing or frame failure is identified by the detailed blast analysis and such further re-designs or mitigation as may be required to achieve an acceptable design as a result of the analysis and/or testing.*

*vi) Emergency vehicle access (physical barriers and management)*

*vii) Provision, location and management of litter bins*

*viii) Defined extent of external café seating areas and alcohol-free zone status to include areas outside of defined external café seating areas.*

*ix) Management of large crowds, i.e. Reading football and pop festival events*

*x) Secure (including visually-verified) access control arrangements for entrances and car parks, including secure mail delivery*

*xi). Lift access control and measures to ensure appropriate compartmentation between and across floors.*

*Condition. No part of the development shall be first occupied until evidence of for residential Secured By Design accreditation has been submitted to and receipted in writing by the Local Planning Authority, unless the Local Planning Authority agrees in writing to an alternative timetable for submission prior to first occupation of any part of the development.*

Thames Valley Police advised at pre-application stage that the Neighbourhood Police Office (up to 25 square metres) secured under the extant permissions is no longer a requirement.

**4.17 Royal Berkshire Fire and Rescue Service**

No response received.

**4.18 Civil Aviation Authority**

No response received

**4.19 Wokingham Borough Council**

Confirm no objection.

**4.20 South Oxfordshire District Council**

No response received

**4.21 Reading Civic Society**

No response received

**4.22 Network Rail**

*"Network Rail has no objection in principle to the above proposal but due to the proposal being next to Network Rail land and our infrastructure and to ensure that no part of the development adversely impacts the safety, operation and integrity of the operational railway we have included asset protection comments which the applicant is strongly recommended to action should the proposal be granted planning permission. The local authority should include these requirements as planning*

*conditions if these matters have not been addressed in the supporting documentation submitted with this application.*

*There are no objections in principle to this proposal from Asset Protection. Any works on this land will need to be undertaken following engagement with Asset Protection to determine the interface with Network Rail assets, buried or otherwise and by entering into a BAPA agreement, if required, with a minimum of 3months notice before works start. Initially the Outside Party should contact us through our generic inbox which is [assetprotectionwestern@networkrail.co.uk](mailto:assetprotectionwestern@networkrail.co.uk)*

*Note the above comments from Asset Protection exclude the consideration of any proposed change to land under Network Rail ownership.*

*Any lighting associated with the development or fabric of the building should not cause glare or distraction to drivers of passing trains.*

*This site is old railway land and there are some covenants on the land that benefit the railway. The applicant is to comply with any rights or obligations reserved which benefit Network Rail.*

*Notwithstanding the above, NR provide additional comments and requirements for the safe operation of the railway and the protection of Network Rail's adjoining land.*

*The development appears to be located on an area of land previously under the ownership of Network Rail. Often these sites are sold and are subject to a demarcation or covenant agreement which may include particular rights in relation to the safe operation of the railway and associated infrastructure. It must be considered when Network Rail has access rights over the development site; access must not be blocked or restricted at any time. The applicant must comply with all post sale covenants in the demarcation agreement and understand the implications this will have on the implementation of this development.*

*Any representations made are without prejudice to those rights and obligations and on the basis that they do not imply that Network Rail's approval under the demarcation agreement will be given for the proposed development or for any part of it.*

*The demolition works on site must be carried out so that they do not endanger the safe operation of the railway, or the stability of the adjoining Network Rail structures and land. The demolition of the existing building, due to its close proximity to the Network Rail boundary, must be carried out in accordance with an agreed method statement. Approval of the method statement must be obtained from the Network Rail Asset Protection Engineer before the development and any demolition works on site can commence.*

*Soakaways / attenuation ponds / septic tanks etc, as a means of storm/surface water disposal must not be constructed near/within 5 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property/infrastructure. Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains. Network Rail's drainage system(s) are not to be compromised by any work(s). Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property / infrastructure. Ground levels - if altered to be*

*such that surface water flows away from the railway. Drainage is also not to show up on Buried Service checks.*

*It is recommended that all buildings be situated at least 2 metres from the boundary fence, to allow construction and any future maintenance work to be carried out without involving entry onto Network Rail's infrastructure. Where trees exist on Network Rail land the design of foundations close to the boundary must take into account the effects of root penetration in accordance with the Building Research Establishment's guidelines.*

*The works involve disturbing the ground on or adjacent to Network Rail's land it is likely/possible that the Network Rail and the utility companies have buried services in the area in which there is a need to excavate. Network Rail's ground disturbance regulations applies. The developer should seek specific advice from Network Rail on any significant raising or lowering of the levels of the site.*

*It is recommended no trees are planted closer than 1.5 times their mature height to the boundary fence. The developer should adhere to Network Rail's advice guide on acceptable tree/plant species. Any tree felling works where there is a risk of the trees or branches falling across the boundary fence will require railway supervision.*

*Any scaffold which is to be constructed adjacent to the railway must be erected in such a manner that, at no time will any poles or cranes over-sail or fall onto the railway. All plant and scaffolding must be positioned, that in the event of failure, it will not fall on to Network Rail land.*

*Any lighting associated with the development (including vehicle lights), and building fabric, must not interfere with the sighting of signalling apparatus and/or train drivers' vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway.*

*The design and siting of buildings should take into account the possible effects of noise and vibration and the generation of airborne dust resulting from the operation of the railway.*

*Any works on this land will need to be undertaken following engagement with Asset Protection to determine the interface with Network Rail assets, buried or otherwise and by entering into a Basis Asset Protection Agreement, if required, with a minimum of 3months notice before works start. Initially the outside party should contact [assetprotectionwestern@networkrail.co.uk](mailto:assetprotectionwestern@networkrail.co.uk).*

**4.23 Crossrail**

No response received

**4.24 Caversham GLOBE**

No response received

**4.25 Reading UK CIC**

*"RUK note the need for a substantial Employment and Skills Plan to be attached to this development, and look forward to working with the developer and contractors*

*(when appointed) to continue the good work that has started with the construction team of Phases E and F.*

*There is also substantial opportunity for the development of an end use programme of recruitment and training, dependent on end use occupiers, which RUK note should include retail, leisure and cultural offers.*

*With regard to the end use offer RUK have submitted some suggestions for potential use of space to drive footfall and create a welcoming image for visitors, which will be especially important for the buildings fronting the Station.*

*There is huge potential for innovation space, perhaps sitting alongside the Urban Room concept which has been established in other cities, and we encourage the developers to consider the option for exhibition or gallery type spaces, which could provide revenue streams as well as becoming important additions to the mixed economy of the modern high street.*

*Reading UK welcomes the provision of a new open space for residents and visitors to enjoy, and the striking design which will create a major new thoroughfare between the Station and the rest of the town, adding to the vibrancy of Reading and to its reputation as a leading urban centre.*

*The development will sit within the Central Reading Business Improvement District and is welcomed as one of the most important regeneration projects the town centre has seen. The BID welcomes the proposals, but again would ask developers to consider the scale and type of retail and hospitality provision, to ensure our town centre continues to thrive with a mix of unique and attractive options contributing to the visitor economy."*

#### **4.26 Thames Water**

##### *"Foul Drainage*

*With the information provided, Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available and as such, Thames Water request that the following condition be added to any planning permission.*

*"No properties shall be occupied until confirmation has been provided that either:- 1. Capacity exists off site to serve the development, or 2. A housing and infrastructure phasing plan has been agreed with Thames Water. Where a housing and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan, or 3. All wastewater network upgrades required to accommodate the additional flows from the development have been completed.*

*Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents."*

##### *Surface Water Drainage*

*With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for SURFACE WATER drainage, but have been unable to do so in the time available and*



as such Thames Water request that the following condition be added to any planning permission.

*"No properties shall be occupied until confirmation has been provided that either:- 1. Capacity exists off site to serve the development or 2. A housing and infrastructure phasing plan has been agreed with Thames Water. Where a housing and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Or 3. All wastewater network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents."*

*The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](https://thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.*

*There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.*

#### *Water Supply Comments*

*Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission.*

*"No properties shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development"*

*There are water mains crossing or close to the development. Thames Water do not permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.*

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

*The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk)*

#### **Supplementary Comments**

*Thames Water advise that a drainage strategy should be provided with the details of pre and post development surface water run off rates and the proposed methods of surface water flow management e.g. attenuation, soakaways etc. The drainage strategy should also contain the points of connection to the public sewerage system as well as the anticipated size of the proposed sewer connection/s (including flow calculation method and whether the flow will be discharged by gravity or pumped) into the proposed connection points. If the drainage strategy is not acceptable an impact study will need to be undertaken."*

- 4.27 Scottish and Southern Energy**  
No response received
- 4.28 Southern Gas Networks**  
No response received
- 4.29 BT (Openreach)**  
No response received.
- 4.30 Berkshire West Clinical Commissioning Group (CCG) (NHS)**  
No response received.

#### **Public consultation**

- 4.31** Site notices were displayed adjacent to the site on Friar Street, Forbury Road, Station Hill, and Garrard Street.
- 4.32** Three letters of representation have been received as follows:
  - i) *"We act for Spelthorne Borough Council. Owners of Thames Tower, Station Road, Reading RG1 1LX, which immediately adjoins to the east of Plot G (Phase 2), referenced in the above application.  
The planning application is a clearly a complex submission and Spelthorne Borough Council, and its management agents, Landid, are presently in further discussions with Lincoln Developments / SH Reading Master LLP, as proposed developers, to further establish:*
    - *The potential level for displaced car parking across Phase 2 and Phase 3 required to serve occupiers of Thames Tower;*

- *How such displaced parking will be achieved as part of the development and how this may be accommodated during construction of Phase 2, through potentially the meanwhile uses suggested for Phase 3;*
- *The impact of proposed servicing arrangements to the west of Thames Tower;*
- *The treatment of landscaping to the west of Thames Tower; and*
- *The potential impact of Building G on the amenity and daylight and sunlight of occupiers of Thames Tower.*
- *Pending the outcome of these discussions we would propose to write further to Reading Borough Council ahead of any determination of the application, which we understand is likely to be no earlier than April 2020.*
- *We would be grateful, as such, if you would consider this a holding objection against the application lodged within the prescribed period. We reserve the right to make additional comment."*  
[Officer comment: No further representations have been received from Spelthorne BC since 17 February 2020. SBC is not able to issue a holding objection in any legal sense that might prevent determination of this application and has been advised accordingly.]

- ii) *"Comment: Given the expected doubling of those aged 65 and over in the next few years perhaps the developers can suggest and provide some innovative facilities for this age group within their plans. Many of us remain active well past this age and others would appreciate meeting places with a range of daytime facilities."*
- iii) *"Comment: I feel that to demolish the car park is going to be a great hinderance to many people. I live in the town centre right near where proposed application is for. Parking is not abundant and I currently pay a large amount to park in the car park as need transport for work. If the car park was demolished this would cause me great stress and inconvenience"*

## 5. RELEVANT LEGISLATION, POLICY, AND GUIDANCE

- 5.1 Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority in the exercise of its functions to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.
- 5.2 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that the Local Planning Authority shall have 'special regard' to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 5.3 In terms of impact of development on the setting of a scheduled monument, securing the preservation of the monument 'within an appropriate setting' as required by national policy is solely a matter for the planning system. Whether any particular development within the setting of a scheduled monument will have an adverse impact on its significance is a matter of professional judgement. It will depend upon such variables as the nature, extent and design of the development proposed, the characteristics of the monument in question, its relationship to

other monuments in the vicinity, its current landscape setting and its contribution to our understanding and appreciation of the monument.

- 5.4 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'.

#### **EIA Regulations**

- 5.5 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.

5.6 **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
6. Building a strong, competitive economy
7. Ensuring the vitality of town centres
8. Promoting healthy and safe communities
9. Promoting sustainable transport
11. Making effective use of land
12. Achieving well-designed places
16. Conserving and enhancing the historic environment.

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

Sections of particular relevance include:

- Air Quality
- Build to Rent
- Climate Change
- Community Infrastructure Levy
- Design: process and tools (and associated National Design Guide)
- Environmental Impact Assessment
- Healthy and Safe Communities
- Historic Environment
- Housing needs of different groups
- Housing for older and disabled people
- Land affected by contamination
- Natural Environment
- Noise
- Open space, sports and recreation facilities, public rights of way and local green space
- Planning obligations
- Renewable and low carbon energy
- Town centres and retail
- Transport evidence bases in plan making and decision taking
- Travel plans, Transport Assessments and Statements

- Use of planning conditions
- Viability
- Water supply, wastewater and water quality

Other Government Guidance which is a material consideration

HM Government: Crowded Places: The Planning System and Counter-Terrorism (2012)

Historic England: Advice Note 4 "Tall Buildings" (2015).

DCLG: Accelerating Housing Supply and Increasing Tenant Choice in the Private Rented Sector: A Build to Rent Guide for Local Authorities (2015)

Sustainable drainage systems policy - Written statement 18 December 2014

#### 5.7 The following local policies and guidance are relevant:

##### **Reading Borough 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

EN2: AREAS OF ARCHAEOLOGICAL SIGNIFICANCE

EN3: ENHANCEMENT OF CONSERVATION AREAS

EN5: PROTECTION OF SIGNIFICANT VIEWS WITH HERITAGE INTEREST

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

EN13: MAJOR LANDSCAPE FEATURES AND AREAS OF OUTSTANDING NATURAL BEAUTY

EN14: TREES, HEDGES AND WOODLAND

EN15: AIR QUALITY

EN16: POLLUTION AND WATER RESOURCES

EN17: NOISE GENERATING EQUIPMENT

EN18: FLOODING AND DRAINAGE

EM1: PROVISION OF EMPLOYMENT

EM2: LOCATION OF NEW EMPLOYMENT DEVELOPMENT

EM3: LOSS OF EMPLOYMENT LAND

EM4: MAINTAINING A VARIETY OF PREMISES

H1: PROVISION OF HOUSING

H2: DENSITY AND MIX

H3: AFFORDABLE HOUSING

H4: BUILD TO RENT SCHEMES

H5: STANDARDS FOR NEW HOUSING

H6: ACCOMMODATION FOR VULNERABLE PEOPLE

H10: PRIVATE AND COMMUNAL OUTDOOR SPACE  
 TR1: ACHIEVING THE TRANSPORT STRATEGY  
 TR2: MAJOR TRANSPORT PROJECTS  
 TR3: ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS  
 TR4: CYCLE ROUTES AND FACILITIES  
 TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING  
 RL1: NETWORK AND HIERARCHY OF CENTRES  
 RL2: SCALE AND LOCATION OF RETAIL, LEISURE AND CULTURE DEVELOPMENT  
 RL5: IMPACT OF MAIN TOWN CENTRE USES  
 RL6: PROTECTION OF LEISURE FACILITIES AND PUBLIC HOUSES  
 OU1: NEW AND EXISTING COMMUNITY FACILITIES  
 OU5: SHOPFRONTS AND CASH MACHINES  
 CR1: DEFINITION OF CENTRAL READING  
 CR2: DESIGN IN CENTRAL READING  
 CR3: PUBLIC REALM IN CENTRAL READING  
 CR4: LEISURE, CULTURE AND TOURISM IN CENTRAL READING  
 CR5: DRINKING ESTABLISHMENTS IN CENTRAL READING  
 CR6: LIVING IN CENTRAL READING  
 CR7: PRIMARY FRONTAGES IN CENTRAL READING  
 CR8: SMALL SHOP UNITS IN CENTRAL READING  
 CR9: TERRACED HOUSING IN CENTRAL READING  
 CR10: TALL BUILDINGS  
 CR11: STATION/RIVER MAJOR OPPORTUNITY AREA  
 CR15: THE READING ABBEY QUARTER  
 CR16: AREAS TO THE NORTH OF FRIAR STREET AND EAST OF STATION ROAD

## **5.8 Supplementary Planning Documents**

- Station Hill South Planning and Urban Design Brief (March 2007)
- Reading Station Area Framework (December 2010)
- Sustainable Design and Construction (December 2019)
- Parking Standards and Design (October 2011)
- Employment, Skills and Training (April 2013)
- Affordable Housing (July 2013)
- Planning Obligations under S.106 (2015)

## **Other Reading Borough Council Documents:**

- Reading 2020 Partnership: Sustainable Community Strategy (2010/11)
- Central Reading Parking Strategy (2004) and Interim Parking Strategy (2011)
- Reading Borough Council's Cultural Strategy: A Life Worth Living
- Reading Biodiversity Action Plan (2006)
- Local Transport Plan 3: Strategy 2011-2026 (2011)
- Tall Buildings Strategy 2008
- Tall Buildings Strategy Update Note 2018
- Reading Open Space Strategy (2007)
- Reading Tree Strategy 2010
- Strategic Housing Market Assessment (2016)

## 6. APPRAISAL

### (i) Principle of Development

- 6.1 The overarching Development Plan policy for the site and surrounding area is contained in Policy CR11 Station/River Major Opportunity Area. This states that *"Development in the Station/River Major Opportunity Area will:*
- i) Contribute towards providing a high-density mix of uses to create a destination in itself and capitalise on its role as one of the most accessible locations in the south east. Development for education will be an acceptable part of the mix;*
  - ii) Help facilitate greater pedestrian and cycle permeability, particularly on the key movement corridors. North-south links through the area centred on the new station, including across the IDR, are of particular importance;*
  - iii) Provide developments that front onto and provide visual interest to existing and future pedestrian routes and open spaces;*
  - iv) Safeguard land which is needed for mass rapid transit routes and stops;*
  - v) Provide additional areas of open space where possible, with green infrastructure, including a direct landscaped link between the station and the River Thames;*
  - vi) Give careful consideration to the areas of transition to low and medium density residential and conserve and, where possible, enhance listed buildings, conservation areas and historic gardens and their settings;*
  - vii) Give careful consideration to the archaeological potential of the area and be supported by appropriate archaeological assessment which should inform the development;*
  - viii) Demonstrate that it is part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling the aspirations of this policy, and which contributes towards the provision of policy requirements that benefit the whole area, such as open space; and*
  - ix) Give early consideration to the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.*
- Development of the station and interchange was completed in 2015. Development in surrounding areas will be in line with the following provisions for each sub-area..."*
- 6.2 The relevant sub area is 'Station Hill & Friars Walk' site allocation under Policy CR11c of the Local Plan. The southern part was recently granted permission under 190441/190442/190465/190466. The current application addresses the northern part. The policy states that:
- "This area will be developed for a mix of uses at a high density, including retail and leisure on the ground and lower floors and residential and offices on higher floors. There will be enhanced links through the site, including in a north-south direction into the Station Hill area and through to the station, and a network of streets and spaces. Frontages on key routes through the site should have active uses. The edge of the site nearest to the areas of traditional terracing west of Greyfriars Road will require careful design treatment."*
- 6.3 Paragraph 10.1.5 of the recently adopted Reading Borough Local Plan 2019 confirms that the Reading Station Area Framework 2010 (RSAF) relates to the development allocation under CR11 and remains in place. It is therefore a material consideration in the determination of the current application. The RSAF is a detailed planning framework for the station area, focused on the upgrade of Reading Station and the consequent regeneration of the surrounding area. It provides a masterplan for the

development of the wider area and allowing the various land parcels to come forward in a coordinated manner. The RSAF will be referred to at relevant sections of this report.

#### *Procedure*

- 6.4 The proposals are presented as a 'Hybrid' application consisting of an application for Full Planning Permission to the eastern part of the site and an Outline application with all Matters reserved to the western part of the site (Phase 3). Added to this are two Non-material Amendments under s.96a of the Act to allow changes to the extant permissions on the parts of the site to the south of Garrard St ("the South Site"). These accommodate the bridge over Garrard Street and a change to the landscaping of Friars Walk.

The proposed Deed of Variation to the South Site permission S106 agreement is being brought to Committee at this time as it is related to the overall Station Hill site and is better considered as part of the overall context.

#### *Proposed Approach*

- 6.5 Phase 2 provides much of the required detail for the proposed office building on Plot G. Remaining detail can reasonably be secured by condition or S106 obligation.
- 6.6 In contrast, the applicant is seeking a highly flexible outline permission within Phase 3. It is accepted that this is a reasonable approach on a site of this scale to ensure deliverability and maximise investment interest and possible longer timescale for this phase to be developed. This is consistent with paragraph 9.2 of the Reading Station Area Framework which supports a "...flexible approach within the broad parameters of policy, recognising that developers and investors need, as far as reasonably possible, to be free to define the particular mix and content of individual schemes". The proposal carries forward the approach of previous schemes on the site with the use of Parameter Plans and Design Codes setting clear limits.
- 6.7 The proposals are for a wide range of flexible uses within the buildings. A flexible use of the ground and lower floors of Phase 2 (Plot G) is proposed with office uses on the upper floors:

*Table 2 – Total Proposed Floorspace (GIA/GEA) within the Detailed Component*

Land Use	GIA (sq m)	GEA (sq m)
<b>Phase 2 – Plot G</b>		
Office (B1)	34,736	35,003
Flexible Retail and Leisure (A1-A5, D1-D2)	1,174	1,214
Podium and Basement	5,941	6,139
<b>Total</b>	<b>41,851</b>	<b>42,356</b>

Source: Submitted Development Specification [aka Planning Statement], DP9



- 6.8 Particular flexibility is sought within the Outline part of the site (Phase 3) with a wide range of uses set within an upper limit of 128,000sqm (Gross External Area) for all floorspace. See table below. This would need to be secured by Planning Condition and is key to defining the maximum scale (height and mass) of the buildings. The amounts of different uses proposed exceed this figure on the basis that this allows for different schemes to come forward at Reserved Matters stage (e.g. more heavily commercial in character/more residential/more of a balanced mix), but none would exceed the defined cap of 128,000sqm. The greatest 'guaranteed' floorspace is for offices (minimum 28,000sqm). Other aspects are more 'flexible' e.g. 750 residential dwellings could be provided, or none. A hotel of up to 26,000sqm could be provided, or not. A C2 residential care facility could be provided up to 26,000sqm (or not). It is quite possible that the proposals could result in an all-office scheme on the upper floors. It would not be appropriate for office uses to dominate the ground and lower ground floors as this would conflict with the various policy aims in terms of mixed use, active frontages and a vibrant public realm. It is recommended that a minimum of 1000sqm retail or leisure (A1, A2, A3, A4, A5, D1, D2) uses be secured by condition. This should be considered alongside the parameter plan requirements for active frontages. A key issue on this site is ensuring that vitality is maintained to parts of the buildings fronting onto the public realm.

Land Use	GIA (sq m)	GEA (sq m)	GIA (sq m)	GEA (sq m)
Phase 3 – Plots A, B, C & D				
	Maximum		Minimum	
Office (B1)	85,600	86,500	25,000	28,000
Residential (Class C3)	63,500	65,000	0	0
Residential Institutions (Class C2)	23,500	26,000	0	0
Hotel (Class C1)	23,500	26,000	0	0
Flexible Retail, Office and Leisure (A1-A5, B1, D1 & D2)	3,500	4,500	450	500
Podium and Basement	22,500	23,000	13,000	14,000

- 6.9 These uses are all town centre uses and it is considered that this approach is acceptable in principle but subject to refinement through the recommended planning conditions/obligations (see recommendation at the head of this report) where necessary to mitigate for potential conflicts between uses and to ensure vitality, mixed use and overall good design. Classes B1, A1, A2 and A3 would fall within new Use Class E; Classes A4 and A5 would be *sui generis* and the non-residential institutions and assembly and leisure uses (D1 and D2) will fall variously

within new Classes F1 and F2, E, or will be deemed *sui generis*. However it is the old use classes which are being used for this application as required under the regulations. The new use classes would allow for a similar mix of town centre uses. The residential use classes remain the same.

(ii) Design

*Design Review*

- 6.10 Independent design review of a scheme of this scale and strategic importance can be very useful and is supported in national guidance (NPPG Paragraphs: 009 Reference ID: 26-009-20191001 and 017 Reference ID: 26-017-20191001).
- 6.11 The pre-application design was appraised by Design South East (DSE) in July 2019. DSE was generally positive about the overall design in terms of its clear improvement in terms of the arrival experience into the town from the station, rectifying the harm created by developments of the 60s and 70s. The scheme did, however, require development and refinement in order to provide better civic and social needs specific to Reading, they reasoned.
- 6.12 DSE focused in on the need for the scheme to strike a balance between a corporate ambition that allows a flexible market response and civic and social need.
- 6.13 Key recommendations included the need for community engagement to identify needs, character and distinctiveness in the new commercial, social and civic spaces. That the designers should be wary of a corporate character in both landscape and architectural proposals. They also advised that the massing, articulation and townscape of the building at Plot G should be tested through use of long views. DSE also advised that the aim should be to ensure that the bulk, height and massing contribute positively to the site context, acknowledging existing civic routes, spaces and intersections. The panel had concerns over the use of glass as the predominant building material in terms of the character, usability, and energy credentials of the scheme. The applicant has latterly worked with officers on many of these points and these are referred to throughout this report as part of the process of refining the design during the application's consideration.
- 6.14 Officers consider that some aspects of the advice, such as the use of glass, is perhaps a matter of preference. It should be remembered that the area already has a strong commercial character. It is also the case that buildings of the scale envisaged for the site within local policy are inherently uncharacteristic of the existing town and must form their own character. Use of 'heavier' materials on buildings of this scale could appear overly dominant, and glass offers a degree of elegance which may be missing from other materials. The submitted design codes set a range of materials including stone, render, concrete, brick and metal across the various plots within Phase 3.
- 6.15 Matters relating to the civic and social need are considered to be very important for a site in this highly prominent location and this is supported by both local and national policy. These are addressed in the Social and Cultural Infrastructure section below.
- 6.16 Local Plan Para 5.3.51, part of the supporting text to Tall Buildings Policy CR10 states that "*...the Council considers that outline planning applications for tall buildings are appropriate only in cases where the applicant is seeking to establish the principle*

*of (a) tall building(s) as an important element within the context of a robust and credible master plan for the area to be developed over a long period of time. In such cases principles must be established within the design and access statement accompanying the application, which demonstrate that excellent urban design and architecture will result".* There is clearly a good deal of risk associated with permitting tall buildings under an Outline permission. The Design Codes and Parameter Plans, together with relevant parts of the Design and Access Statement are therefore very important in securing suitable design quality.

- 6.17 National Planning Practice Guidance Paragraph: 010 Reference ID: 26-010-20191001 advises: *"In some instances, it may be appropriate as part of the outline application to prepare and agree a design code to guide subsequent reserved matters applications. Design quality cannot be achieved through an outline planning application alone. Outline planning applications allow fewer details about the proposal to be submitted than a full planning application, but can include design principles where these are fundamental to decision making."*
- 6.18 Paragraph: 011 continues: *Parameter plans can provide elements of the framework within which more detailed design proposals are generated, but they are not a substitute for a clear design vision and masterplan, and need to be used in a way that does not inhibit the evolution of detailed proposals. For example, setting maximum parameters for aspects such as building heights can still allow flexibility in determining the detailed design of a scheme."* This is an important point in that whilst the submitted parameter plans set maximum parameters, the LPA retains a good deal of control at Reserved Matters Stage in terms of refinement of the relative heights, massing and appearance of the buildings and the quality of the public realm. That said, there remains a tension within the process in that the 'Amount' of development is set at Outline stage and it is not possible for the LPA to 'row back' from an approved position at Reserved Matters Stage. It is therefore important that the LPA is satisfied that the physical expression of the amount would be acceptable and would be capable of being moulded to conform to policy requirements at Reserved Matters stage.
- 6.19 The Design and Access Statement provides detail on how design principles will be applied to achieve high quality design. It sets out concisely how the proposal is a suitable response to the site and its setting, taking account of baseline information. (as per NPPG Paragraph: 012 Reference ID: 26-012-20191001). The applicant has provided three illustrative options to give an indication of how the development could look and has provided scaled drawings which demonstrate that the floorspace of all three options (which have been provided simply to illustrate a number of possible forms that the development *might* take) fit within the 128,000sqm GEA floor area that is being applied for. The options are therefore a good indication of the approximate size of the scheme.

OPTION 1 OUTLINE SCHEME



OPTION 2 OUTLINE SCHEME



OPTION 3 OUTLINE SCHEME



- 6.20 NPPG Paragraph 013 confirms the importance of planning conditions in ensuring design quality:

*"During the decision-making stage, where limited design documentation has been prepared as part of the outline planning application, a local planning authority can consider using conditions to ensure that fundamentally important principles are respected in detailed design and to set out if there are further detailed design requirements to make a scheme acceptable. Conditions on design can be identified at the outline planning application stage allowing for the details to be submitted for later determination as part of a reserved matters application."* Conditions are recommended to secure development in accordance with the Design Codes and Parameter Plans and Landscaping proposals. Other conditions proposed also perform a similar function to ensure design quality is achieved.

***Layout, Routes and Integration with the South Site.***

- 6.21 A north-south route through the scheme is a key requirement of specific policies relating to the Station Hill site, including CR11 and the RSAF.
- 6.23 The Phase 2 proposals link to the Phase 1 'Friars Walk' route via a footbridge. It is important that the two are developed together to allow them to join effectively and a condition is recommended to secure provision of the bridge prior to first occupation of the Plot G (Phase 2) office building. The submitted NMAs also seek to amend the

landscaping within Phase 1 to bring it in line with the themes and layout of the Phase 2 scheme. This is considered to be acceptable as per the recommendation at the start of the report (200822/200823). It is equally important that the bridge is not provided until Phase 2 is implemented and at a suitable stage of build-out. Otherwise, the steps approved under the extant permissions should be installed as per the conditions attached to those permissions. The proposed Non-material Amendments which allow for the steps to be omitted are therefore recommended for approval subject to a condition preventing implementation before the Phase 2 podium deck is substantially complete. The committee report for the South Site (190441/190442) identified that the levelling-off of Friars Walk has both advantages and disadvantages compared with the 2015 permissions. Having made this design choice for the South Site, it follows that the north site should be developed at a similar level and the proposed podium deck design solution is considered acceptable in general terms, provided that the edges of the podium are suitably designed and landscaped.

- 6.24 The Phase 2 public realm continues northwards from the bridge and opens out into a public square with a central space designed for events with the main shared walking and cycling routes running through the space to either side. This space lies at the heart of the scheme and would be surrounded by the building plots on all sides. The space is considered to be of an appropriate size relative to the scale of the very tall buildings surrounding it.
- 6.25 The Phase 2 public realm then extends on to the station square. Here the space necessarily turns into much more of a shared civic space in terms of the way it functions. The station square is the focus of numerous existing pedestrian and cycle desire lines as well as the new routes created by the proposed scheme. Officers have been considering this issue with the applicant throughout the application process. It is considered that whilst the landscaping is clearly intended to 'steer' pedestrians into the new development and along the north-south route, it also makes appropriate provision for east-west routes from the taxi ranks on Station Hill and the Station Underpass up steps into the main square. The 'Pocket Park' and Station Square landscaping are fundamental to the appearance and layout of the scheme and must be provided in conjunction with the initial stage of development (Phase 2) which contains the main areas of public realm and the main routes through. The Pocket Park would perform a range of functions including provision of suitable pedestrian permeability, resolving the change in levels between podium deck and Station Hill both visually and functionally, tree planting, public open space, biodiversity, urban cooling, and securing a suitable 'gateway to Reading' etc.. The applicant has suggested that the Pocket Park and Station Square landscaping could be provided in Phase 3. Officers have made it very clear that this would not be acceptable and conditions are recommended to secure provision linked to Phase 2 delivery. There has also been the suggestion that the Council could contribute financially to the provision of the pocket park. Officers have advised that funding of, or investment in, a scheme such as this is not a matter for the Local Planning Authority and should not affect the determination of the application.
- 6.26 The Highway Authority has raised concerns over the accessibility of the main north-south route where the levels change adjacent to the station underpass, particularly for wheelchair users, cyclists and those with pushchairs, etc. Officers agree that the route would be improved with a new ramp within the public realm. The applicant has resisted this citing the amount of land that would be required to accommodate a ramped access and the effect this would have on the landscaping of the space and the visual contribution it makes. The applicant proposes instead to provide access

between the levels with a lift at the north-western corner of Phase 2 and notes that the accessible 'switchback ramp' already exists a short distance to the north adjacent to the railway station and no other provision currently exists. It is relevant to note that Phase 1 negotiates the change in levels between Friars Walk and Garrard Street through the use of a passenger lift, which is secured through the S106 legal agreement. On balance, it is considered that adequate accessibility would be maintained for all users, with the exception of cyclists who are restricted from using the switchback ramp (unless they dismount) and cannot use the lift. It is considered that this provides a strong justification for the proposed Greyfriars Road cycle route as a vital piece of infrastructure to be secured by S106 agreement. This has the advantage of catering for the desire line from south Reading, St Mary's Butts and West Street and links more effectively with the existing cycle route on Stanshawe Rd.

- 6.27 Links down to Garrard Street would be maintained with the use of a new flight of external steps adjacent to the bridge and extending down to Garrard St. These are considered to be of good quality design with a suitable width (2.5m) with an additional 0.5m to the edge that allows climbing plants to be provided to the flank wall. Provision is recommended to be secured within the condition which secures provision of the adjacent bridge over Garrard Street.
- 6.28 Landscaping and layout within Phase 3 are less certain at this stage as the precise layout has not yet been established and Landscaping is a Reserved Matter. The Design and Access Statement provides images of the design intent, including outdoor café seating, street benches, tree planting and a clear pedestrian route east west through to a flight of steps (and lift) down to Greyfriars Road. It is considered that the minimum public realm width of 18 metres would be sufficient to accommodate this. This dimension is secured by the Parameter Plans which are recommended to be secured by condition. A condition to secure full details at Reserved Matters stage is recommended.

### *Height and massing*

- 6.29 Tall buildings are defined in Policy CR10 Tall Buildings as 10 commercial storeys or 12 residential storeys equating to 36 metres tall. Policy CR10 sets clear guidance on tall buildings in Reading and only allows them in the 'areas of potential for tall buildings' defined in the policy and on the Proposals Map.
- 6.30 The application site is at the centre of the area CR10a: Station Area Cluster. The specific policy for this area is clear that the station should be at the heart of a cluster of tall buildings to, *"signify the status of the station area as a major mixed-use destination and the main gateway to, and most accessible part of, Reading"*.
- 6.31 Policy CR10 is clear that the tallest buildings should be close to the station and step down in height from that point toward the lower buildings at the fringes. The policy also requires the creation of a *"coherent, attractive and sustainable cluster of buildings with a high quality public realm"*. It is noted that this cluster extends beyond the Station Hill site and includes sites north of the railway. Another key policy requirement of CR10a is that proposals are to, *"Ensure that adequate space is provided between the buildings to avoid the creation of an overly dense townscape and to allow buildings to be viewed as individual forms"*. This has been the subject of a good deal of discussion between the applicant and officers and is discussed in more detail in respect of individual plots below.

6.32 Policy CR10 also includes a range of requirements for all tall buildings.

*“v) In addition to the area-specific requirements, all tall building proposals should be of excellent design and architectural quality, and should:*

- Enhance Reading’s skyline, through a distinctive profile and careful design of the upper and middle sections of the building;*
- 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;*
- Contribute to high-quality views from distance, views from middle-distance and local views;*
- Take account of the context within which they sit, including the existing urban grain, streetscape and built form and local architectural style;*
- Avoid bulky, over-dominant massing;*
- Conserve and, where possible, enhance the setting of conservation areas and listed buildings;*
- Use high quality materials and finishes;*
- Create safe, pleasant and attractive spaces around them, and avoid detrimental impacts on the existing public realm;*
- Consider innovative ways of providing green infrastructure, such as green walls, green roofs and roof gardens;*
- Locate any car parking or vehicular servicing within or below the development;*
- 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;*
- Ensure adequate levels of daylight and sunlight are able to reach buildings and spaces within the development;*
- 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;*
- Provide managed public access to an upper floor observatory and to ground floors where appropriate, and ensure that arrangements for access within the building are incorporated in the design stage;*
- Incorporate appropriate maintenance arrangements at the design stage.”*

**Plot G (Phase 2 - Full Application).**

6.33 Plot G would rise to 123 metres AOD in height before stepping down to 16 storeys (110.2m AOD) for a short section at a point approximately 14 metres from the south façade and then dropping again to 9 storeys (81.9m AOD) at a point approximately 7 metres from its southern facade. It would measure approximately 50m north-south and 40 metres east-west. It would rise above Thames Tower which sits immediately to the east at 103.3 metres AOD and have a larger footprint. The building would be slightly taller than the hotel recently approved at 29-35 Station Road (permission 181930) but with a much larger footprint.

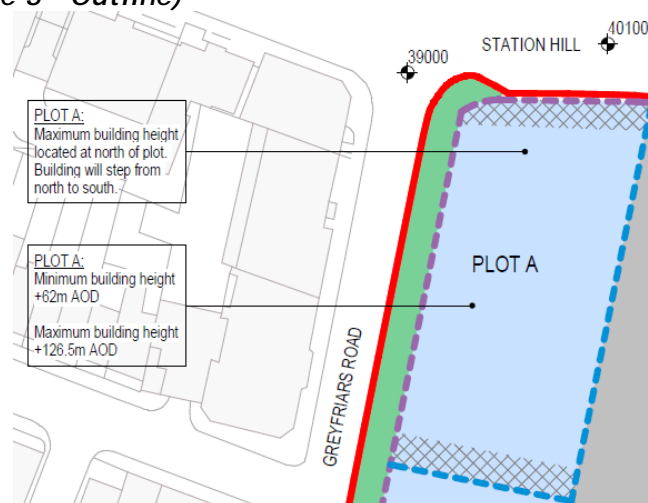
6.34 The proposal would be a substantial building within this setting, however it is relevant to note that the extant permission (SH3) also provides for a pair of large buildings with quite a different arrangement. Proposed Plot G would extend across



only part of Plots C and G of the extant permission, is not as wide and does not extend as far into the station square to the north. The extant permission sets a maximum height of 128m AOD for Plot C to the north and 83m AOD for Plot G (remodelled Garrard St Car Park). Whilst the extant permission does include a very narrow pedestrian route between Plots C and G “The Arcade”, the plots would in effect be read as one mass in visual terms. It is considered that Plot G, as currently proposed, sits within the basic parameters of the extant permission (as a guide for comparison purposes – this is not an absolute requirement). Although the new design brings the height southwards, it respects the previous height immediately adjacent to Garrard Street and achieves the significant benefit of drawing the mass away from the station square to create a more spacious public realm.

- 6.35 Unlike Thames Tower, the design seeks to break up the bulk of the building both in terms of the actual massing, (the scale dropping lower adjacent to Garrard Street), and through the use of shadow gaps and fins within the glazed facades in order to provide some relief from the scale and offer a degree of elegant ‘verticality’ to the facades which could otherwise appear somewhat slab-sided. The choice of a glazed façade would also provide a degree of ‘lightness’ to the building. It would nevertheless remain a substantial built form within its setting due to its sheer scale.
- 6.36 Other benefits to note are that the building would replace the visually-harmful Garrard Street Car Park. It would also be set back from Station Hill and the station square in a way that the buildings on the extant “Station Hill 3” permissions are not. This would provide more public space and landscaping potential to the north of the building where it is most important, and this would also provide further relief from the mass of the building.
- 6.37 Taking a balanced view, it is considered that Plot G would be an acceptable addition to this part of the site but that Plot G would be at the limits of what reasonably might be acceptable on this plot within the cluster. This is also closely bound up with the acceptability of other tall buildings in the site and the wider cluster in terms of their height, mass and spacing and the cumulative effect, which requires careful consideration.

#### *Plot A (Phase 3 - Outline)*



- 6.38 Plot A sits at the corner of Station Hill and Greyfriars Road at the north west corner of the site. It is proposed that this building should rise to a maximum of 126.5m AOD. This compares with a maximum height 91m AOD under the extant (SH3) outline

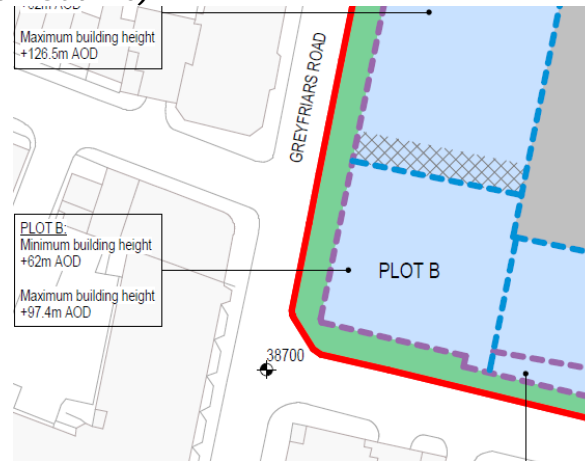


permission. The parameter plans are clear that this building will step down from north to south which is considered to give sufficient clarity that the building would not be able to rise to the maximum height for its entire footprint when the detailed design comes forward at Reserved Matters stage.

- 6.39 Policy CR10 requires a stepping down towards the existing lower buildings at the fringes of the site.
- 6.40 *Policy CR11c states that "The edge of the site nearest to the areas of traditional terracing west of Greyfriars Road will require careful design treatment."*
- 6.41 Policy CR9 requires "the character of Sackville St/Vachel Rd/ Stanshawe Rd to be respected"
- 6.42 Fig. 6.10 on p.38 of the RSAF provides an indication of a reduction in height to this boundary and shows the western edge of Greyfriars Road as an "*Area with particular sensitivity to the effects of tall buildings*". However, this needs to be held in tension with the indicative plot heights in figs.6.8 and 6.9 of the RSAF where Plot S1 equates to proposed Plot A and a minimum benchmark of 10 storeys is referred to with the landmark element being taller. The indicative scheme for the site in the RSAF (Fig 14.11) also appears to take a more generous approach to height with tall buildings fronting onto Greyfriars Rd. However, this in turn is qualified by paras. 6.24 to 6.26 of the RSAF which explains that benchmark heights may be modified downwards where harm to amenity, heritage assets or important views is identified and that there is a general presumption that benchmark heights should grade back to established heights in the surrounding areas, and that all landmark locations necessarily contain tall buildings.
- 6.43 The policy background is therefore complex and finely-balanced. It is considered that the extant permission is a material consideration and acts as a useful guide. Permission 130436 included a non-standard condition (Condition 24) which requires a set-back 'shoulder' to upper floors fronting Greyfriars Road. The reason given for the condition is that "*the Design Codes and Parameter Plans would otherwise produce a structure which would be overly-dominant on Greyfriars Road, to the detriment of the streetscene and the residential amenity of residential properties on the western side of Greyfriars Road*". A key principle behind any condition is that it must be 'necessary', and that its use makes an otherwise unacceptable development acceptable. Condition 24 is therefore a strong indicator that the extant permission height (91m AOD) is at the limits of acceptability, requiring a set-back shoulder as mitigation.
- 6.44 The Applicant has revised the proposals during the course of the application, reducing the height of Plot A from 151.5m AOD to 126.5m. The building line has also been set back 5 metres from the kerb edge on Greyfriars Road to allow for landscaping and cycleway but also to reduce the visual impact. The extant permission allows the *plot* to extend closer at around 2 metres from kerb (the existing pavement) although it should be noted that 'plot' does not necessarily equate to 'building' as it would normally include landscaping and other incidental land surrounding a building. The two are therefore not directly comparable.
- 6.45 Overall, it is considered that Plot A would be of an acceptable scale. This is solely on the basis that it is set at its revised position no closer than 5 metres to the kerb edge and modified through a condition, (similar to Condition 24 of permission

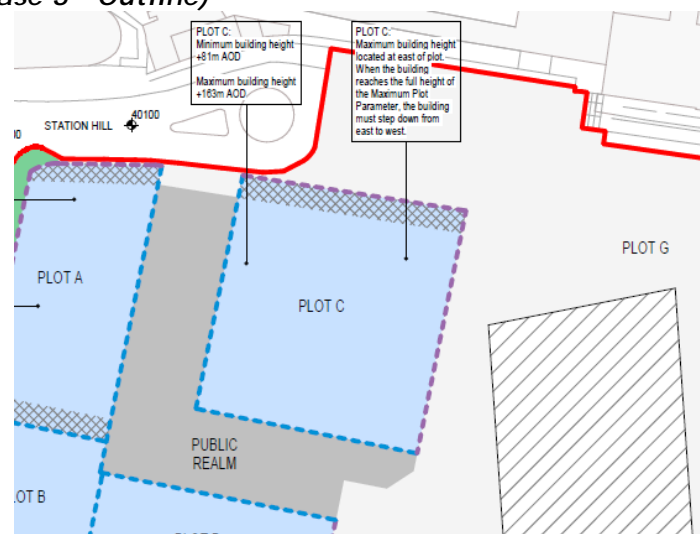
130436, that requires a shoulder set-back to floors above a level broadly equivalent to what would be the upper floors of buildings permitted under the extant permission) and the Parameter Plans and Design. This is set out in the Recommendation above at Condition 77. Furthermore the building would be required to step down from its maximum height from north to south as per the revised parameter plans. As with Plot G, the overall acceptability depends on the acceptability of other plots, particularly in terms of the requirement of Policy CR10a that *"adequate space is provided between the buildings to avoid the creation of an overly dense townscape and to allow buildings to be viewed as individual forms"*

#### Plot B (Phase 3 - Outline)

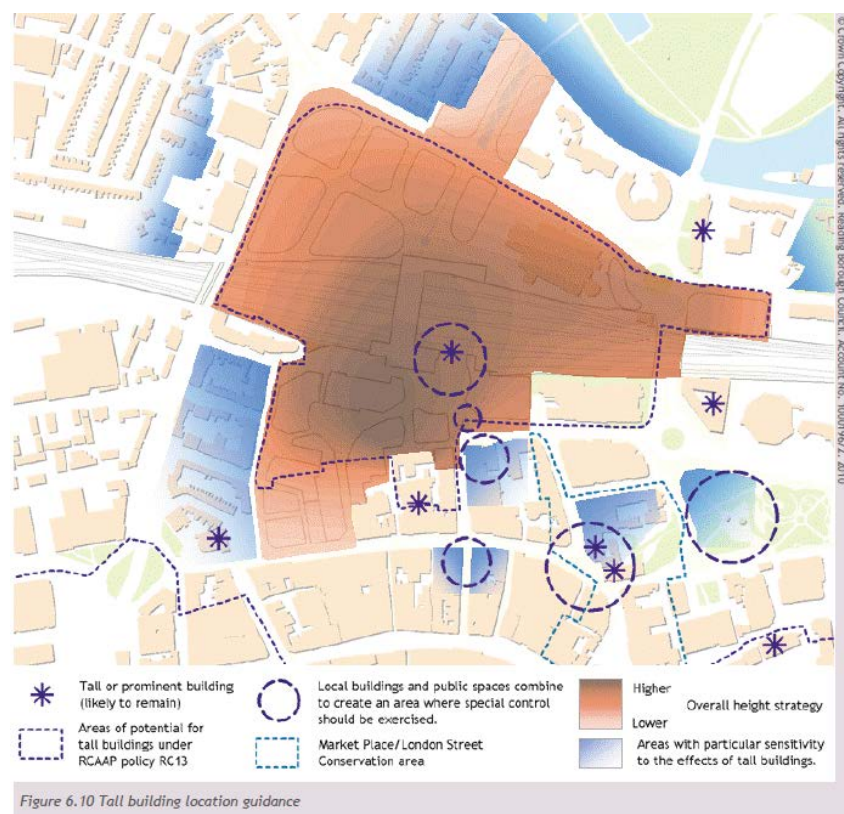


- 6.46 Plot B sits at the corner of Greyfriars Road and Garrard Street at the south west corner of the site. The parameter plans allow for this to link onto Plot A. It is proposed that this building should rise to a maximum of 97.4m AOD. This compares with a maximum height 91m AOD under the extant SH3 permission. It is considered that this is broadly acceptable (the additional 6.4m would typically equate to two additional storeys), taking into account the set back from the road and subject to the condition requiring a set-back to upper floors being carried across to this Plot.

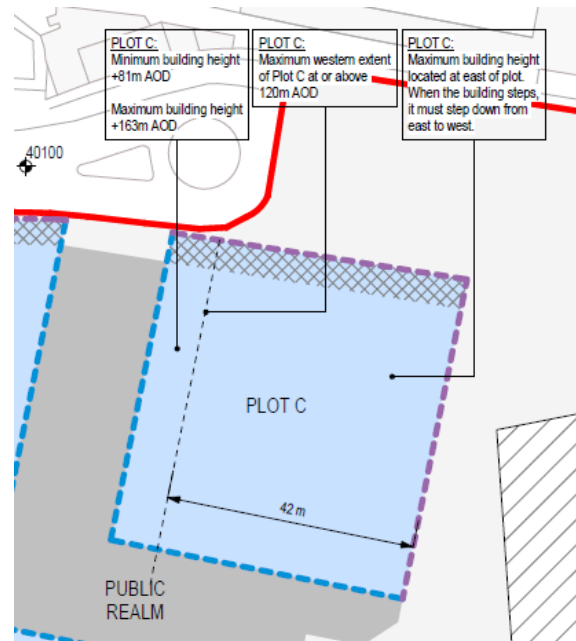
#### Plot C (Phase 3 - Outline)



- 6.47 Plot C sits at the corner of Greyfriars Road and Garrard Street at the south west corner of the site. The parameter plans allow for this to link to Plot A. It is proposed that this building should rise to a maximum of 163m AOD. The plot is broadly equivalent to Plot B within the extant permission which is approved at a maximum height of 121m AOD. A taller building of 168m AOD has been approved on the Station Hill site in the past on Plot C of the Station Hill 2 ('SH2') scheme, 09/01079/OUT which lay to the northern end of what is now proposed Plot G. This was granted planning permission in October 2011 but has since lapsed. This is relevant in terms of broader context but the SH2 permission was generally defined by taller but more slender buildings compared to SH3. It is considered that height should not be assessed separately from massing when considering the townscape impacts of the proposals.
- 6.48 The tallest building has shifted slightly westwards under the current proposals compared with the extant permission. Policy CR10a requires tall buildings to follow a pattern of the tallest buildings at the centre of the tall building cluster, close to the station, and step down in height from that point towards the lower buildings at the fringes. This is echoed in the RSAF which requires tall buildings to rise up around the Station 'nexus' and the area of maximum permissible height within the 'dome' of the 'crown' immediately adjoining and to the south of the station entrance. The effect of the building massing should be 'dramatic' (RSAF paras 6.11 to 6.14). The tallest buildings of SH2 and SH3 are both closest to the station entrance. The current proposals deviate slightly in this regard with Plot G closest to the station entrance but not as tall as Plot C. It is considered that, although different from previous versions, this is supported by Figure 6.10 of the RSAF (copied below) which shows the 'hotspot' for the tallest buildings to the north and west of Thames Tower and supports the greatest height being focussed broadly where it is currently proposed - at the eastern edge of Plot C.



- 6.49 The revised parameter plans confirm that the building on Plot C must step down from east to west. This is clarified further in the revised Design Code (para 4.8.4) which states that the tallest part of any buildings on Plot C must be to the east of the plot and further revisions which show a fixed vertical boundary line which sets where the maximum extent of the building would be to ensure a step is built into the design of a wider footprint building (see below).



Extract from drawing A-705-P03

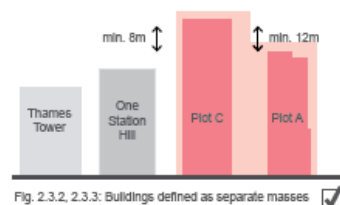


Fig. 2.3.2, 2.3.3: Buildings defined as separate masses

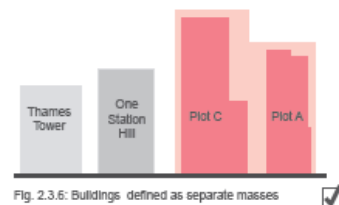


Fig. 2.3.6: Buildings defined as separate masses

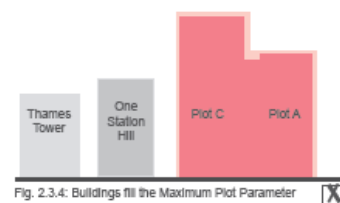


Fig. 2.3.4: Buildings fill the Maximum Plot Parameter



Fig. 2.3.7: Tallest building at east of Plot C

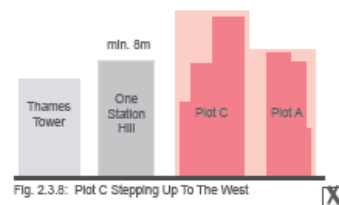
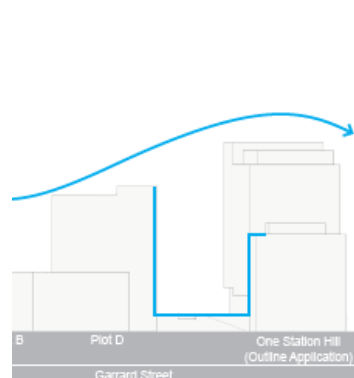
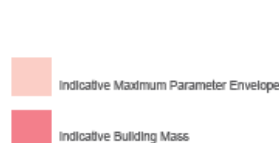


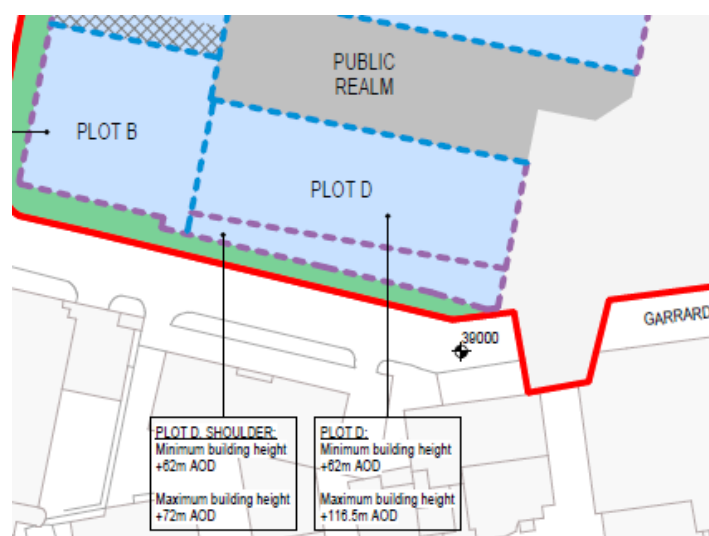
Fig. 2.3.8: Plot C Stepping Up To The West



Design Code (para 4.8.4)

- 6.50 The parameter plans allow for the mass of Plots A and C to cantilever out over the Station Hill footway. This is perhaps the most appropriate part of the site for this type of feature due to the spacious public realm and space afforded by the railway land beyond to the north.
- 6.51 Para. 2.19.2 of the Design Code confirms that where Plot A or C protrude over the pavement, a minimum of 6m height clearance must be maintained from the pavement to the underside of the cantilevering soffit. This is considered to be sufficient in general terms. The exact design and extent of any overhang can be controlled at Reserved Matters application Stage.
- 6.52 Taking these various matters into account it is considered that a height of 163m AOD on Plot C would be appropriate but that this is subject to appropriate form and massing. The detail provided in the Parameter Plans and Design Codes (supported by the design intent set out in the Design and Access Statement) provides a degree of assurance that an appropriate height and massing for Plot C can be achieved at Reserved Matters stage. However, the advice of Historic England is that the bulk and massing needs to be fully considered in the context of Greyfriars Church and the Church of St. Mary and the St. Mary's Butts Conservation Area. This is addressed in more detail in the Views and Heritage section below.

#### *Plot D (Phase 3 - Outline)*



*Extract from drawing A-705-P03*

- 6.53 Plot D fronts Garrard Street, immediately to the north of Plot E (see Reserved Matters approval for Plot E 190465). The parameter plans allow for this to join onto a building on Plot B, which in turn could join onto a building on Plot A. It is proposed that this building should rise to a maximum of 116.5m AOD but with a defined shoulder set back to Garrard Street limited to 72m AOD. The plot is in a broadly equivalent location to Plot D within the extant permission which is approved at a maximum height of 105m AOD.
- 6.54 Proposed Plot D would extend wider across Garrard Street than the extant permission as it is proposed to allow it to join the corner building at Plot B. SH3 by comparison required an 8 metre gap between plots. The proposed Plot D is less deep at approximately 25 metres north-south compared with Plot D of SH3 which was approx.

42m north-south. It is apparent that Plot D would result in a substantial building if built to its maximum parameters but it is considered to be broadly comparable with the extant permission for this parcel of the site. For this reason it is considered that this Plot is appropriately scaled in general, with the shoulder. However the way in which it presents a wide façade to the outside of the site (to Garrard Street) and joins with Plot B could have implications in wider townscape terms and the requirements of Policy CR10a to *"Ensure that adequate space is provided between the buildings to avoid the creation of an overly dense townscape and to allow buildings to be viewed as individual forms"*. This is discussed in more detail below.

### *Townscape, Views and Heritage*

- 6.55 Policy CR10 requires that all tall buildings *"should be of excellent design and architectural quality, and should:*
- Enhance Reading's skyline, through a distinctive profile and careful design of the upper and middle sections of the building; ...*
  - Contribute to high-quality views from distance, views from middle-distance and local views; ...*
  - Avoid bulky, over-dominant massing..."*
- 6.56 Policy CR10a specifically requires tall buildings in the Station Area Cluster to:
- Follow a pattern of the tallest buildings at the centre of the cluster, close to the station, and step down in height from that point towards the lower buildings at the fringes;*
  - Contribute to the creation of a coherent, attractive and sustainable cluster of buildings with a high quality of public realm;*
  - Ensure that adequate space is provided between the buildings to avoid the creation of an overly dense townscape and to allow buildings to be viewed as individual forms;..."*
- 6.57 Supporting text at paragraphs 5.3.42 to 5.3.44 of the Local Plan advises that:
- "From longer distances, the overall massing and proportion is most important, and the relationship between the silhouette and the skyline should inform the design. In the case of mid-distance views, the overall composition and detail are perceived in balance, and the hierarchy and articulation of elevations are particularly important. Finally, for local views, the interrelationship of the building's base and the immediate setting will be particularly visible, and the quality of materials and the detailing will be critical.*

*The contribution that tall buildings can make to views in terms of their locations should also be taken into account. Aligning tall buildings to terminate or frame views can create a strong reference point, allowing greater urban legibility.*

*There are some key panoramic views of the central area that tall buildings should make a positive contribution to. These include the views of the central area from Balmore Park, Caversham Park, Kings Meadow, Reading Bridge, and from Oxford Road to the west of the centre, the Whitley Street area to the south and Wokingham Road to the east."*

- 6.58 'Heritage' has been included in this section as although the application site itself does not contain any heritage assets, the scale of the proposals means that they

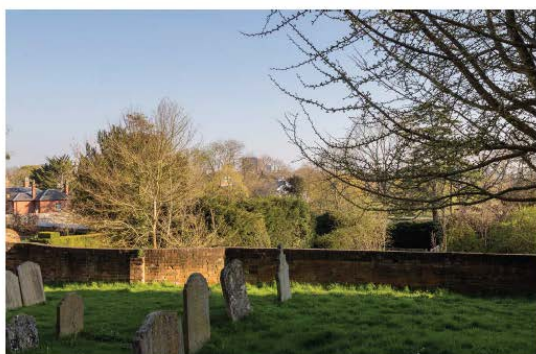


will affect the setting of a wide range of heritage assets at short, medium and potentially long-ranges.

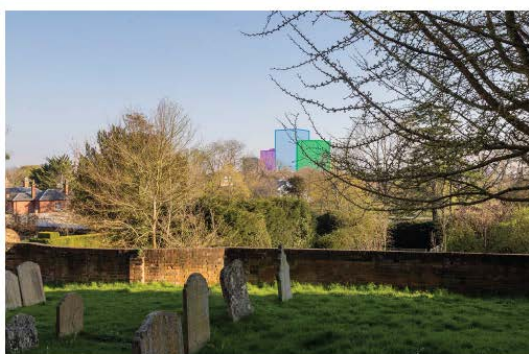
- 6.59 Policy EN5 introduces a new policy requirement in respect of views with heritage interest. Particular views are specifically defined (RBLP fig.4.2) and these do not appear to be affected by the proposals. The policy can be applied more widely to other views with heritage interest. It is considered that this is suitably addressed under the wider townscape assessment within this report.
- 6.60 Chapter 7 of the Reading Station Area Framework (RSAF) is entirely focused on 'Views' and provides a set of 61 short, medium and long-range views that need to be considered.
- 6.61 The submitted Environmental Statement includes a Townscape and Visual Impact Assessment which assessed the effects on townscape character and views. This is based on 'wireline diagrams' of the maximum parameters viewed from various key vantage points.
- 6.62 It is important to note that a development of the scale envisaged within the Tall Buildings policy CR10 and the Station Area Framework will be highly visible and cannot be hidden. In fact para. 6.13 of the RSAF requires that "*The approach to building massing should be dramatic, with a new cluster of taller buildings forming a new and distinctive skyline for the Station Area as a centrepiece of the centre*". It is therefore little surprise that the wireline drawings show the new structures having a strong presence, arguably dominance, within most views within the town centre and from further afield from higher ground within and surrounding the town.
- 6.63 The submitted Environmental Statement suggests that adverse effects would only occur where the viewpoints are particularly sensitive and currently have a particularly rural outlook currently devoid of tall buildings. These views include from St Peter's Church and Church Yard (Caversham); a viewpoint approximately 4km to the north east of the at Dunsden Green; Caversham Bridge and from a viewpoint within Christchurch Meadows. The ES states that, if the Proposed Development is built to maximum parameters, the effect on these viewpoints would be 'major adverse' due to the change in skyline from these viewpoints. The effects would reduce to 'moderate adverse' if the Proposed Development is built to minimum parameters.



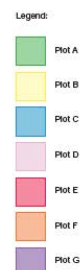
Above: View of maximum parameters (not actual massing which will be less) from Caversham Bridge, N.B. Plot A (green shaded) has been reduced a further 10m in height.



View from St Peter's Churchyard looking towards the site.



Proposed view of Completed Development from St Peter's Churchyard.



Above: View of maximum parameters (not actual massing which will be less) from St Peter's Churchyard the church is Grade II\* listed) Caversham N.B. Plot A (green shaded) has been reduced a further 10m in height.



View from Baltimore Park looking south towards the site.



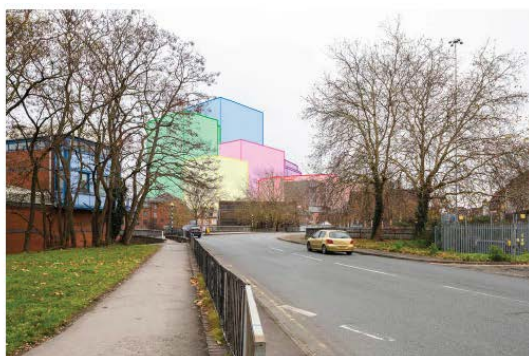
Proposed view of Completed Development from Baltimore Park.



Above: View of maximum parameters (not actual massing which will be less) from Baltimore Park Caversham N.B. Plot A (green shaded) has been reduced a further 10m in height.



View from Chatham Street looking east towards the site.



Proposed view of Completed Development from Chatham Street.



Above: View of maximum parameters (not actual massing which will be less) from Chatham Street Roundabout (IDR) N.B. Plot A (green shaded) has been reduced a further 10m in height.



View from St Laurence's Church looking north-west towards the site.



Proposed view of Completed Development.





Above: View of maximum parameters (not actual massing which will be less) from St. Laurence's Church with Reading Town Hall Grade II\* listed to right of image. N.B. Plot A (green shaded) has been reduced a further 10m in height.



Above: View of maximum parameters (not actual massing which will be less) from Castle Street with Reading Minster Church (Grade I listed) centre right of image. N.B. Plot A (green shaded) has been reduced a further 10m in height.



Above: View of maximum parameters (not actual massing which will be less) from Friar Street with Greyfriars Church (Grade I listed) central within image. N.B. Plot A (green shaded) has been reduced a further 10m in height.

- 6.64 It is important to note that this assessment relates to the maximum parameters, i.e. if buildings filled the coloured wireframe boxes. Officers are satisfied that the floorspace applied for would not allow this to occur. Buildings may reach the top of the wireframe box in terms of their height. However, the massing would not fill the box in terms of its width. The Design Codes also refine this further confirming that the mass will be broken up with step downs within the building and gaps between buildings e.g. Design Code figs.2.3.2 to 2.3.8).
- 6.65 In order for tall buildings to be clearly discerned as individual buildings, it is important to maintain adequate gaps between them.
- 6.66 The spacing between buildings will be critical to the success of the scheme and the width of the public realm between Plots A-B-D and Plot C is crucial. The minimum 18 metres would only exist at street (podium) level up to 2 storeys height. The proposal includes the potential for narrowing of the gap to 12 metres at the ends of the public realm at floor level 2 upwards. This would clearly reduce the benefits of the public realm gap, especially in medium to long-range views although it is acknowledged that the articulation within the façade would remain and would serve to define the different structures (although a continuous 18m width between facades on all floors would be preferable). The proposed potential for buildings on Plots A,

B and D to physically join together increases the risk of an overly dense townscape and a lack of definition between buildings viewed from the south and west (see for example the Chatham Street view below). The 18 metre public realm *would* be visible over the top of the lower Plot B from this angle and is considered to be adequate to define the individual buildings and avoid an overly dense character. But officers are clear that this arrangement is on the very limits of acceptability. A lesser gap would be harmful.

- 6.67 The Applicant proposes to allow the gaps to reduce to 12 metres on floor level 2 upwards with this reducing further to 9 metres at each end of the public realm where in the event that the Reserved Matters proposals are all-office use on upper floors. Officers are clear that this would be harmful visually and result in an overly dense townscape and militate against the requirement to allow buildings to be viewed as individual forms. It could also result in buildings that lack a distinctive profile or careful design of the upper and middle sections of the building and would be harmful within, and fail to contribute to, high-quality views from distance, middle distance. It is considered that, at this spacing the buildings would be bulky and over-dominant within short range views and in terms of their impact on the Public Realm (public realm matters are addressed in more detail above). These concerns have been the subject of lengthy discussions with the Applicant and it is acknowledged that the additional clarification provided within the revised Design Code in respect of the stepping down in the mass of Plot C would offer some mitigation for the harm identified. Nevertheless it is considered that the proposed 'all-office' spacing would be contrary to Policy CR10. The harm identified must therefore to be weighed against the public benefits in accordance with Para. 196 of the NPPF. This is addressed as part of the overall planning balance at the end of this report.

### *Heritage*

- 6.68 Historic England are very clear in their advice that the scale, and particularly the massing of the buildings on Plots A and C (the tallest blocks) would be harmful to the setting of heritage assets at Greyfriars Church (Grade I listed), and the Minster Church of St. Mary (Grade I listed). They also note that the proposals would result in a degree of harm on the Town Hall (Grade II\*), Church of St Laurence (Grade I) and the Market Place/ London Street conservation area, which should be taken into consideration.
- 6.69 Historic England recommend that heights should be limited to those of previous consents. Taking this into account officers note that 'SH3' (130436) was made up of lower but bulkier buildings but SH2 (09/01079/OUT) rose to slightly taller than that currently proposed. It is considered that the bulk, or mass, of the buildings is therefore the key difference given the distances involved and this should be the focus of attempts to mitigate the impact.
- 6.70 HE advice focuses in on the *height* of Plot C in respect of Reading Minster, as HE acknowledge that the harm could be reduced through a more slender shape (massing) orientated north-south. Greyfriars Church is closer and opportunities to reduce harm appears less. But HE note that lowering the height of Plots A and C would go some way to reducing visual dominance.
- 6.71 HE concerns also focus on the nature of the outline scheme which does not define the form (shape) of the towers or their external treatment. Height is a key component of how visually intrusive the towers could be, the shape of the buildings

and their mass or bulk might also reduce, or equally exacerbate, this. Particular design choices could therefore go some way to minimising harm.

- 6.72 The height of Plot A has been reduced by a further 10 metres since HE commented and the Parameter Plans now clarify that the building would step down from North to South. The applicant has also agreed to a condition requiring a 'shoulder' set back to the Greyfriars Road façade of Plot A. The Design Codes have also been revised to provide more detail on the massing of Plot C, confirming that it will step down from east to west where it extends across the width of the plot (it would not necessarily step if it remained a relatively slender tower to the eastern side of the plot).
- 6.73 Despite the concessions and mitigation referred to above, it is considered that it remains the case that if the buildings rose to the full height permissible and with the amount of floorspace expressed as built form, (which could be in various permutations, along the lines indicated by the three illustrative 'options'), the buildings would be of a height and mass which would remain harmful to the setting of the identified heritage assets to the south and west and by implication to the setting of other assets (Grade II listed Three Guineas pub directly to the north or the Town Hall (Grade II\* listed) or Church of St Laurence (Grade I) for example). It is noted that the revised parameter plans and design codes go some way to mitigate this harm by clarifying that the form of the upper storeys and gaps between buildings.
- 6.74 Historic England qualify their advice by confirming the harm would be "less than substantial" this refers to paragraph 196 of the NPPF which states that "*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*".
- 6.75 National Planning Practice Guidance provides further advice on the interpretation of para. 196: "*The National Planning Policy Framework confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It also makes clear that any harm to a designated heritage asset requires clear and convincing justification and sets out certain assets in respect of which harm should be exceptional/wholly exceptional (see National Planning Policy Framework, paragraph 194).*" (Paragraph: 018 Reference ID: 18a-018-20190723)
- 6.76 NPPG continues "*The National Planning Policy Framework requires any harm to designated heritage assets to be weighed against the public benefits of the proposal. Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.*" Paragraph: 020 Reference ID: 18a-020-20190723
- 6.77 Overall, in respect of views of the development, it is considered that a group of buildings of the scale proposed, or that previously permitted under SH2 and SH3 for that matter, would almost inevitably be highly visible within the views referred to.

It is considered that the scale and general massing proposed would achieve the “dramatic” effect sought by policy (RSAF para 6.13) and that the general massing strategy would achieve the overall skyline ‘dome’ effect with Plot C at the centre stepping down to Plot G to the east and Plot A to the west and then again to Plots D and B.

- 6.78 The design codes and parameter plans provide adequate assurance that, whilst large, (and probably at the limits of what the site could reasonably accommodate), sufficient control remains over the form (shape) of the buildings and their appearance at Reserved Matters stage (Layout, Scale and Appearance are reserved).
- 6.79 The effects on heritage are closely bound up with ‘views’ in terms of the setting of heritage assets both in terms of views out from the asset towards the proposed development, and views of assets with the large mass of development as a backdrop. It is considered, based on the advice received, that the proposals would result in ‘less than substantial harm’ to designated heritage assets, and those identified in particular (Greyfriars Church, Minster Church of St. Mary and the St. Mary’s Butts Conservation Area). The refinements to building height and massing during the course of the application provide some mitigation, but not sufficient to remove this harm. As with views, it is considered that this impact is, to a degree, a product of the policy aims for this area of the town centre and the planning history of the site which sets certain expectations for the height and amount of development. The remaining harm (less than substantial) must therefore to be weighed against the public benefits in accordance with Para. 196 of the NPPF. This is addressed as part of the overall planning balance at the end of this report.

#### *Abbey Quarter*

- 6.80 Policy CR15 (The Reading Abbey Quarter states that “*The Abbey Quarter will be a major area for heritage and cultural life within the Borough, offering educational, economic and open space opportunities. The Council will pursue any opportunities to reinstate features of architectural or historic significance and remove features that harm the asset and its setting. Development in the vicinity should promote the architectural, archaeological or historic interest of the Abbey and its setting. The Abbey Quarter will:*
  - a. protect and enhance the historic setting and frame the Abbey as Reading’s most significant heritage asset;*
  - b. manage and maintain its heritage assets within a coordinated approach;*
  - c. further reveal significance for public enjoyment through enhanced access, interpretation, archaeological investigations or repair of neglected elements;*
  - d. mitigate impacts on transportation networks by strengthening pedestrian, cycling and public transport linkages for increased tourism; and*
  - e. represent a cohesive heritage destination for tourism and investment.**The Abbey Quarter should be considered in the context of the adjacent Reading Prison site identified in policy CR13, which represents an opportunity to further consolidate the cluster of heritage interest.”*
- 6.81 The route from the station to the Abbey Quarter is a key part of the public transport links for access, tourism and revealing the historic interest of the Abbey. The works at Station Hill change the dynamic of the space around the station and introduce new routes and areas of population and commercial activity. It is expected that the Public Art Strategy will link with Abbey Quarter, extending the historic themes to include Civil War defences in Garrard St, Viking associations with land north of the railway, etc. Specific costs totalling £60,000 have been identified in discussion with Reading Museum and the Abbey Quarter project officers, to provide additional

directional signage and interpretation panels linking with the station area due to the change in the setting described above. This is considered to be a site-specific requirement to mitigate the specific effects of the regeneration of this large part of the town centre and is recommended to be secured through the S106 agreement.

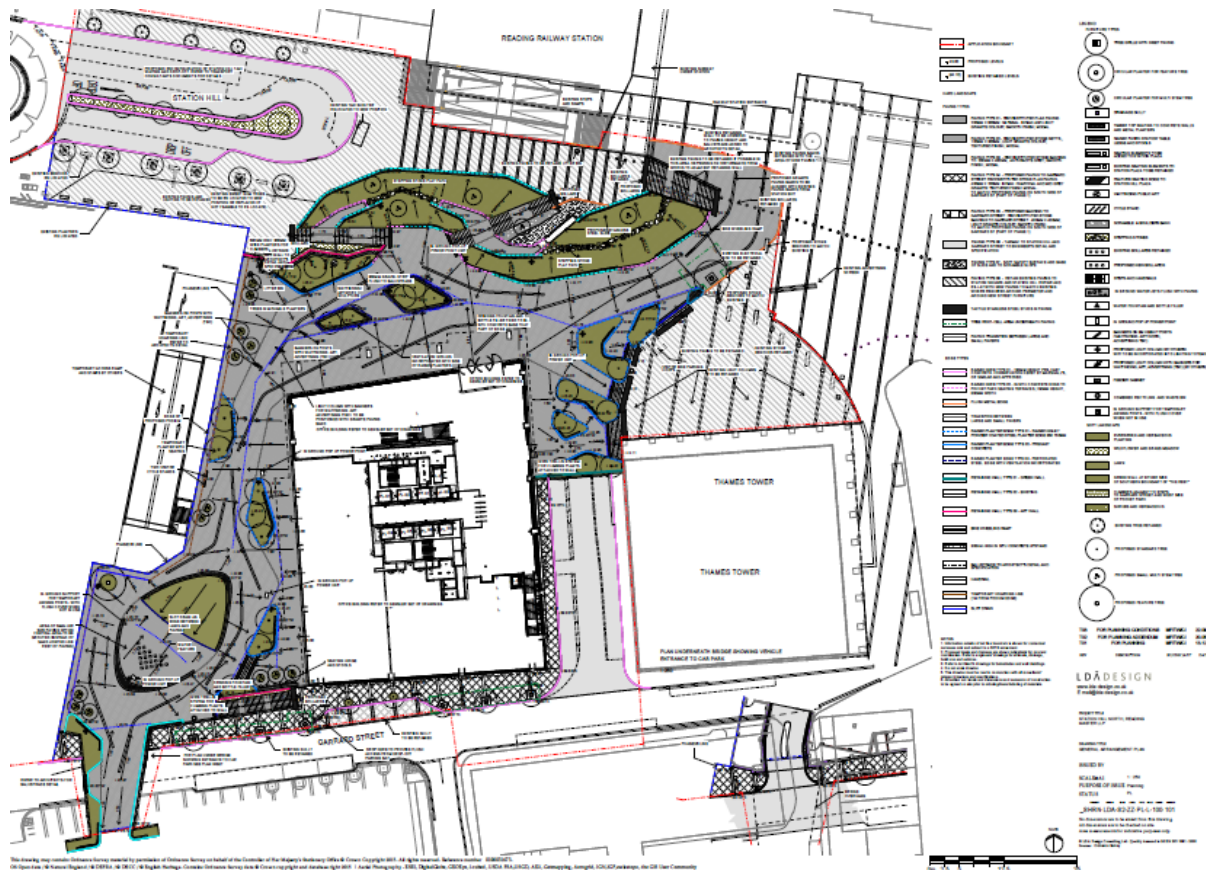
### *Architectural Detailing*

- 6.82 Policy CR2 states that *"The architectural details and materials used in the central area should be high quality and respect the form and quality of the detailing and materials in areas local to the development site"*.
- 6.83 Policy CR10a states that *"Tall buildings should... Contribute to the creation of a coherent, attractive and sustainable cluster of buildings with a high quality of public realm..."* and Policy CR10 "v) *In addition to the area-specific requirements, all tall building proposals should be of excellent design and architectural quality, and should:*
- *Enhance Reading's skyline, through a distinctive profile and careful design of the upper and middle sections of the building;*
  - *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;*
  - *Contribute to high-quality views from distance, views from middle-distance and local views;*
  - *Take account of the context within which they sit, including the existing urban grain, streetscape and built form and local architectural style;*
  - *Avoid bulky, over-dominant massing;*
  - *Conserve and, where possible, enhance the setting of conservation areas and listed buildings;*
  - *Use high quality materials and finishes;*
- ...
- *Incorporate appropriate maintenance arrangements at the design stage"*.
- 6.84 Phase 2 provides a detailed design for the building on Plot G. As described elsewhere in this report, the scale of the building is considerable, but various architectural devices are used to 'break-up' the mass and maintain visual interest. The design maintains a simple palette of materials but articulates them effectively in the horizontal and vertical planes. This is particularly evident on the north façade fronting the station where the building steps, resulting in three distinct vertically orientated sections. The articulation is also clearly evident where the building steps down to the south towards Garrard Street
- 6.85 The glazed facades are proposed to be fitted with closely spaced vertical metal fins. These are an important feature as they serve to provide verticality, especially where the building risks losing its vertical emphasis at the east and west facades and the recommended materials condition refers specifically to the fins' provision.
- 6.86 The building also provides a finer grain of detailing with the recessed glazed reception on the lower floors and further refinement of the massing at the upper floor amenity areas with recessed areas and overhangs.

- 6.87 It is considered that the building rightly relies on articulation of the structure, rather than a wide range of different materials, in order to relieve the mass of the building and maintain visual interest. The simplicity in the choice of materials then serves to unify the building and would result in a dramatic glazed façade with a good deal of visual interest within it.
- 6.88 The Design and Access Statement (section 2.5) provides details of the façade construction and it is recommended that a condition should be imposed requiring full details and samples to be submitted (or provided on site as a sample/mock-up panel where appropriate) in accordance with the details annotated on the submitted drawings and in accordance with the principles set out in the DAS. It is considered that the Phase 2 proposals comply with the requirements of policies CR2 and CR10 in terms of the architectural approach and overall appearance. The proposals also comply with the overarching requirements of Policy CC7 (Design and the Public Realm).
- 6.89 Phase 3 is inevitably less certain, as Scale, Layout and Appearance are Reserved Matters. However the LPA needs to be satisfied that, in granting permission for the amount and type of development proposed, an appropriate, policy-compliant design can be required and secured at Reserved Matters application stage. The submitted Design Codes provide a good deal of detail on the types of materials and the architectural approaches that will be employed and a requirement that the Reserved Matters comply with the Design Code is proposed to be secured by condition.
- 6.90 The Design Codes set out fundamental principles such as the need for buildings to be designed with a bottom section which relates to the street and provides openness and activity, a middle which emphasises the vertical and a top section with amenity areas and to crown the building.
- 6.91 It is proposed that the treatment of the facades would relate to the types of uses contained within the building residential uses would use materials with a more solid appearance, including brickwork, rendered panels, terracotta, stone and concrete. Predominantly office-use buildings would have a predominantly glazed finish. It is considered that this sort of flexibility is consistent with the wide range of possible building scales, layout and appearance that could still come forward at Reserved Matters stage and that it would be possible to secure appropriate architectural design and detailing at that stage. It would be appropriate for the Reserved Matters design to be subject to further pre-application discussions including further independent Design Review in line with national guidance. Nevertheless, the Outline proposals are considered to comply with Policies CR2, CR10 and CC7 at this stage of the design development.



## Public Realm and Landscaping



**Phase 2 Landscape Plan**

### Phase 2

- 6.92 Phase 2 includes what might reasonably be described as the main areas of Public Realm including the north-south route linking with Friars Walk to the south, a new public square in the centre of the scheme, a new extended area of Station Square and the pocket park stepping down to a re-configured taxi rank on Station Hill.
- 6.93 The link with Friars Walk (South Site) is proposed to be achieved through a combination of current applications 192032, 200822/NMA and 200823/NMA. The Non-material amendments were envisaged at the time of granting approvals 190441/190442/190465/190466 and are required to remove the steps down to Garrard Street and remodel the northern end of Friars Walk to accommodate the new bridge proposed under 192032. The NMAs also include changes to the landscaping of Friars Walk itself, with changes to paving and planting beds to fit with the flowing river theme proposed for the North Site.
- 6.94 The NMAs also include a re-configuration of the landscaping within the northern courtyard of Plot E. The courtyard is still well landscaped with trees, shrubs and seating areas. It is more open than before with a more useable central space for residents and other users of the building.

- 6.95 It is considered that the NMA proposals are acceptable in respect of the landscaping of the south site and would fit well with what is proposed north of Garrard St. It is recommended that 200822/NMA and 200823/NMA should be approved as per the recommendation at the top of this report. However, it is important that they are not implemented separately from the North Site permissions, i.e. the steps down to Garrard Street within Phase 1 must be provided as per the extant conditions in the event that Phase 2 is not built. Conditions are recommended to secure this.
- 6.96 The link bridge across Garrard Street is considered to be well-designed with visual interest achieved through an asymmetrical plan-form and edged with planting beds containing shrubs and herbaceous plants. It would range from approximately 8 metres in width at the southern end and widen to around 12 metres where it meets the north site. It is considered that these dimensions strike an appropriate balance between the need to allow emergency and service vehicle access across the bridge and accommodate the proposed planting, whilst minimising the extent of the undercroft 'tunnel' at Garrard Street level, a particular failing of the old Friars Walk scheme.
- 6.97 North of the bridge, the public realm opens out into an irregularly shaped public square averaging approximately 40 metres east to west and 30 metres north to south. This space is considered to be necessary to provide relief from, and an appropriate setting for, the very large scale buildings that are proposed to surround it (significantly taller than the extant permission). This space is at the heart of the scheme and would function as part of the north south route and for activities related to the uses within the scheme. A central 'island' provides opportunities for performances and other events with pedestrian and cycles directed around to either side of the slightly raised area. This island also incorporates a water feature with fountain nozzles inlaid into the paving to allow for alternative uses when the water is turned off.
- 6.98 The north-south route and public realm narrows as it passes between Plots G (detailed scheme) and Plot C (Outline scheme). This serves to define the central square as a distinct space with its own character, separate from the Station Square whilst allowing glimpses through to the distinctive railway station overbridge structure, which helps with wayfinding and context. Restricted wider angle of views will also be possible through the glazed entrance area of Plot G, although this is dependent on the interior design of the building in the longer term.
- 6.99 The Pocket Park is a key improvement (see also above), allowing the square to extend at the primary level (that of the station entrance and main square) before stepping down to the secondary spaces surrounding the site, including a rationalised and re-configured taxi rank. It is also the case that the pocket park is a product of the proposal to extend the raised podium (and the 'basement' beneath) right up to the edge of the highway. A feature of this kind is required to reconcile the difference in levels and avoid a stark 'cliff edge' to the scheme fronting Station Hill. The pocket park serves to soften the edge of the podium and is one of the main opportunities for tree planting within the scheme. It provides both functional direct routes between the lower and higher levels and less direct, more recreational paths with seating along its edge. A children's slide is included in the design between the two levels. It is apparent that the podium forms a fundamental part of the scheme design and layout and that the Pocket Park is a direct result of the podium design.



- 6.100 The space at northern end of site forms part of the existing Station Square and enlarges this space with an extension of the podium at the same level as the square north-westwards towards the Southwest Interchange (taxi rank on Station Hill). The proposed space is larger than that proposed under the extant permission with the proposed landscaping extending to the station underpass (see below for comparison images). One improvement is the setting back of Plot G relative to the station frontage providing a less stark, more inviting, frontage to the new development, leading the eye into the north-south route through the scheme. The additional space also provides relief to the mass of the very large buildings and is important to their setting.
- 6.101 A detailed planting and hard landscaping scheme has been provided as part of the Phase 2 proposals. This includes details of new trees to be provided. This has been the subject of detailed discussion between the Applicant and officers. Policy CC3 identifies trees as important in adapting the urban area to climate change and requires wherever possible *“Use of trees and other planting, where appropriate as part of a landscape scheme, to provide shading of amenity areas, buildings and streets and to help to connect habitat, designed with native plants that are carefully selected, managed and adaptable to meet the predicted changed climatic conditions”*. Policy EN12 Biodiversity and the Green Network, has similar requirements and Policy EN14: Trees Hedges and Woodlands seeks to increase the level of tree coverage in the Borough. It is considered that the revised landscaping scheme contains a suitable range of larger trees capable of providing shade and influencing the character of the spaces once mature, and the proposal is acceptable in this regard. A large-species Chestnut-leaved Oak is proposed north of Thames Tower and has been selected as it was introduced to the country at the same time that the railway arrived in Reading. A range of native trees including Rowan, Scots Pine and Silver Birch are proposed for their ecological as well as visual amenity value. Other decorative trees and shrubs are also included to provide visual interest. A condition securing provision in accordance with these details as well as securing full planting and hard landscaping details (where more detail is still required), together with conditions securing long term maintenance of landscaping are recommended.
- 6.102 Officers have identified an existing lack of seating generally within the area which limits enjoyment of the public realm and its usefulness as a space. The landscaping proposals correct this with a good amount of seating throughout, mostly through the use of timber slatted seats to the edge of raised planting beds and central performance space.

### ***Phase 3 Landscaping***

- 6.103 Officers have made it very clear to the Applicant that the layout should incorporate a high quality of Public Realm which meets the functional and amenity needs of all users, including members of the public visiting or passing through the site. Fundamentally this is dictated by the distance between buildings and the degree to which the height and massing of the buildings is overbearing upon, or overshadows, the outdoor space.
- 6.104 It is important to note that all buildings surrounding the public realm between Plots A, B, C and D exceed the maximum height parameters of the extant permission. This increase in height necessitates a wider public realm than previously permitted. It is also relevant that Plots A, B and D join in an L-shape whereas previously a gap existed between B and D.

- 6.105 The size of the public realm is also directly related to the wider townscape impacts of the proposal and the requirement of Policy CR10a that proposals are to “*Ensure that adequate space is provided between the buildings to avoid the creation of an overly dense townscape and to allow buildings to be viewed as individual forms*”. The fact that Plot B joins to Plots D and A makes it even more important that appropriate spacing is achieved in the middle and upper parts of the buildings, i.e. the parts that would be viewed over the top of Plot B, especially within the setting of heritage assets described in the Views section of this report above.
- 6.106 The revised Parameter Plans now set the footprint of the public realm within Phase 3 at a minimum of 18 metres between building facades (see below). This is considered acceptable as a minimum, although the very tall buildings will inevitably make the space feel heavily enclosed.



*Public Realm at Ground Floor Level - all schemes*

- 6.107 The Parameter plans and Design Codes propose to reduce the gap to a minimum of 12 metres at the northern and eastern edges of the Phase 3 public realm at floor level 2 and above (see below). This would be similar to the approach taken at the Friar Street entrance to Friars Walk approved under 190465. It is considered that this could have some townscape benefits in providing some articulation to the buildings and creating enclosing and defining the Phase 3 public realm as a distinct character area. Persons experiencing the space would pass through a more enclosed section with undercroft before passing through into a full width public realm with clear views of the sky and only the effects of perspective causing the buildings to close in on the space.

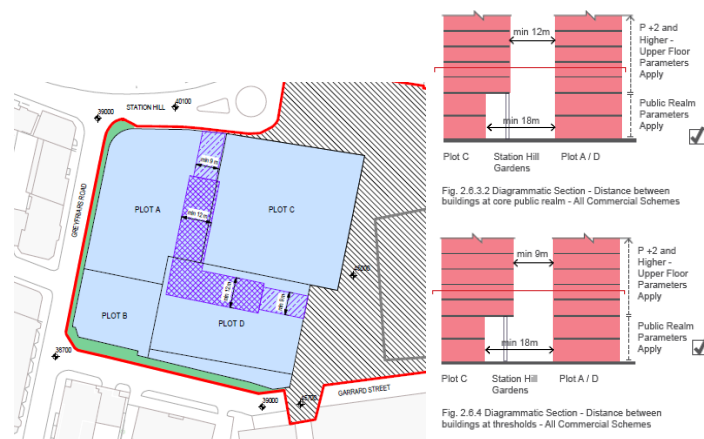


*Spacing between buildings Floor Level 2 and above - Mixed Use Scheme*

- 6.108 By contrast, where the upper floor uses are all commercial (to be defined as Office use only) the Parameter plans and Design Codes propose to reduce the gap further

to a minimum of 9 metres at the northern and eastern edges of the Phase 3 public realm at floor level 2 and above (see below) and reduce the remainder to 12 metres at floor level 2 and above. It is considered that this is a particularly weak aspect of the proposals which would be harmful to the quality of the public realm. Despite remaining at 18 metres wide at ground and first floor level, the parameter plans and design codes would allow the space to be heavily enclosed and hemmed in above first floor with buildings looming large over the space and the effect accentuated by the heavy overhanging element which could run around the perimeter of the space. This harmful effect would be further exacerbated when combined with the potential height of the buildings (significantly taller than the extant permission), and the effect of perspective (the buildings appearing closer together as they increase in height).

- 6.109 As stated above the size of the public realm is also directly related to the wider townscape impacts of the proposal and the requirement of Policy CR10a that proposals are to *"Ensure that adequate space is provided between the buildings to avoid the creation of an overly dense townscape and to allow buildings to be viewed as individual forms"*. Closing the gap to 12 and 9 metres and at the heights proposed would be likely to result in the middle and upper parts of the buildings merging visually and would not provide sufficient relief to the mass of the buildings.
- 6.110 Based on the current Parameter Plans and Design Codes it cannot be guaranteed that this harm could be 'designed out' at Reserved Matters stage. As referred to above) It is acknowledged that the stepping down of Plot C from east to west would provide some mitigation in this regard and that this would need to be a particular focus at Reserved Matters stage to ensure that the massing is arranged as beneficially as possible in terms of avoiding it impinging on the Public Realm and longer distance views from the south. (see also the Views section of this report (para 6.53 onward). The Applicant has been unwilling to amend the scheme despite clear officer advice to do so. This harm therefore remains and must be weighed against the wider benefits of the scheme as part of the overall Planning balance.



#### *Spacing between buildings Floor Level 2 and above - All Commercial Scheme*

- 6.111 The landscaping of the Phase 3 public realm is a Reserved Matter and a fully detailed landscaping scheme will be required to be submitted for the space at Reserved Matters Application stage. The 'flexibility' of the proposals in terms of the position of the public realm (the Parameter Plans allow it to shift by a few metres to

accommodate different building layouts whilst maintaining the minimum 18 metre width). Where the parameters allow for heavy overhangs to buildings, this will inevitably limit the choice of tree species that can be accommodated.

iii) Land Use

- 6.112 Para. 9.2 of the RSAF explains that *"Although the policy [Policy RC1, broadly replaced by Policy CR1] sets out appropriate ranges of land uses in certain locations, it contains as little prescriptive detail as possible. Likewise, the Framework does not prescribe specific or rigid land uses, but encourages a flexible approach within the broad parameters of policy, recognising that developers and investors need, as far as reasonably possible, to be free to define the particular mix and content of individual schemes."*
- 6.113 The building on Plot G (Phase 2 detailed application) is predominantly in office use (Class B1a (new Use Class E)). A range of town centre uses are proposed on the ground floor including retail (A1), Financial/professional (A2), restaurants/cafes (A3), Drinking Establishments (A4), Hot-food takeaway (A5), Office (B1), Non-residential institutions (D1) and Assembly and Leisure (D2) . The proposed uses are all town centre uses located within the Central Core, Primary Shopping Area and Office Core and are therefore supported in this location under Policy CR1. Some uses are considered to be less 'active', not normally open to visiting members of the public, B1 offices for example. This is potentially contrary to Policy CR11 which requires *"developments that front onto and provide visual interest to existing and future pedestrian routes and open spaces"* and *"Frontages on key routes through the site should have active uses"*. The need for active frontages is also a theme running throughout the Reading Station Area Framework document. A condition is recommended to secure a scheme to provide, maintain and manage an active frontage to the western façade of Plot G fronting onto the new public square at podium (Ground Floor) level and to the southern façade of Plot G fronting Garrard Street at Lower Ground Floor level. This is considered an appropriate balance between allowing a flexible approach to uses for commercial purposes (and the response to Covid-19) and ensuring high quality active frontages are maintained.
- 6.114 Policy CR5 (Drinking Establishments in Central Reading) *supports "A range of complementary evening and night-time uses that appeal to all sections of Reading's society, and contribute to the 18-hour welcome, will be provided. Such uses should not give rise to adverse impacts on the amenity of nearby residents and other town centre users. Those uses that are likely to have an adverse impact on amenity or the character and/ or function of the Central area, will not be permitted. Proposals for pubs, bars and clubs should be accessible to current and proposed night-time public transport services"*. The siting of Plot G adjacent to rail, bus and taxi services, and fairly separate from residential areas, suggests that the impacts would be acceptable.
- 6.115 The uses in Plot G are considered to be acceptable in general terms, in accordance with Policies CR1, CR5, CR11 and the RSAF. The nature of the uses and controls on their impacts are subject to recommended conditions and Planning obligations as described elsewhere in the report.
- 6.116 The Outline component, Phase 3, at the western side of the site is proposed to have a high degree of flexibility over the types of uses within the buildings, which in turn

are flexible in terms of their layout, scale and appearance. The definite use would be a minimum of 28,000sqm of office use with a minimum of 500sqm flexible B1, A1, A2, A3, A4, A5, D1, D2 use at ground floor level. The position of the flexible uses within the scheme will be dictated to some extent by the Parameter plans which show active frontages which will require an appropriately active use on that frontage. The office and flexible uses are considered to be acceptable for the same reasons as those within Phase 2.

- 6.117 Phase 3 also has the option to incorporate a range of other uses, including up to 750 dwellings, a Class C2 residential institution (care home, Extra Care facility etc), and or a hotel. All these uses are also town centre uses and are acceptable in principle. The key issues are considered to be the physical expression in terms of the form, layout, scale and appearance of the buildings and the importance of avoiding conflicts between uses. These are largely addressed elsewhere. It is considered important that the use relates to the building design. For instance a building designed for hotel or office use is not necessarily appropriate for residential use (problems of daylight, outlook, privacy, floorspace, noise, amenity space etc). A condition restricting residential use of buildings constructed/designed initially for non-residential purposes is therefore recommended.

#### ***Residential Use - Class C3***

- 6.118 It is noted that the South Site, in providing 538 dwellings, is already well within the "indicative potential" range of 380-570 dwellings set out in Policy CR11c. This supports the proposed 'flexible' approach which could result in no dwellings being provided (they are already provided elsewhere in the site under the extant permissions for the Phase 1 South Site. Equally up to 750 dwellings could be provided, which is also acceptable on the basis that there is no upper limit on the number of dwellings within the site (or the Borough for that matter) in principle.
- 6.119 Policy CR6 states that *"All proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided. As a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed/studios, and a minimum of 5% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable."*
- 6.120 The Applicant has provided an indicative residential mix of 10% studio, 46% one-bed (i.e. 56% one-bed, 42% two-bed, and 2% three-bed but suggests that the final unit mix should be dependent on the type of development that comes forward at Reserved Matters stage. Given the flexibility that is being proposed in terms of numbers, uses, built form etc, this is not an unreasonable approach. However it is important that this is understood as remaining flexible. The indicative mix is not approved at Outline stage and remains to be assessed under Policy CR6 at Reserved Matters stage.
- 6.121 Policy H5 requires suitable standards for new housing. The nationally-described space standards are not a policy requirement within the Central Area. However they are a good indicator of quality and the applicant's Development Specification/Planning Statement (para 4.24) confirms that all new-build housing will comply with the standards. This appears to be possible given the amount of residential floorspace proposed. As with 'mix' (see above) the precise layout and

size of dwellings will be a matter to be assessed under the Reserved Matters application. A condition requiring the internal layout of all buildings to be submitted concurrently with the Reserved Matters application(s) is recommended.

- 6.122 Policy H5 requires all new build housing to be accessible and adaptable in line with M4(2) of the Building Regulations, unless it is built in line with M4(3) and at least 5% of dwellings will be wheelchair user dwellings in line with M4(3). The applicant confirms that at least 10% will be M4(3) with 90% being to M4(2). This complies with Policy H5 and a condition is recommended.
- 6.123 Other aspects of the proposals relating to the acceptability of residential uses are addressed elsewhere in this report. It is recommended that a condition removing permitted development rights to change to a dwelling from any other permitted use should be imposed. The local plan contains numerous requirements specific to dwellings (layout, size, mix, outlook, daylight, privacy, noise, affordable housing etc etc) which must not be 'missed' through a permitted change in due course.

#### *Residential Institution Use - Class C2*

- 6.124 The proposals seek approval for up to 26,000 square metres of Class C2 floorspace on Plots A, B and/or D. Class C2 is for the provision of residential accommodation and care to people in need of care (other than a use within class C3 (dwelling houses)). This could be a use as a hospital or nursing home or use as a residential school, college or training centre.
- 6.125 Use Class C2 is broad in terms of the character of development that it accommodates (e.g. a boarding school as opposed to a hospital or a residential care home for the elderly or a residential training centre). Particular issues can arise due to the subtleties that exist in defining buildings in C2 institutional use containing individual 'flats' for residents and those containing individual Class C3 dwellings e.g. retirement flats (C3) vs. extra care/care home (C2). A key determining factor is the provision of care to residents, its nature and its scope. The sheer scope of the flexible permission sought makes control difficult at Outline stage. A condition is therefore recommended requiring details of the internal layout of all buildings and location and extent of uses to be submitted concurrently with the Reserved Matters application(s) for approval. Subsequent construction, occupation and use will need to be in accordance with the approved details. The nature of those uses would also need to be prescribed under the S106 agreement, for instance the type and amount of care provided, the range of communal facilities provided, the number of bedspaces/occupiers etc. this is included in the recommendation above. These controls are necessary to comply with Policy H6 (Accommodation for Vulnerable People) as well as ensuring good design and good amenity for occupiers.

#### *Hotel Use - C1*

- 6.126 The proposals seek approval for up to 26,000 square metres of Class C1 hotel floorspace on Plots A, B and/or D.
- 6.127 A hotel use is a town centre use and is to comply with Policy CR1 on that basis. It is considered that the use would fall with the "mix of uses at a high density" required

under policy CR11b although it not specifically referred to unlike other Sites in Policy CR11 Station/River Major Opportunity Area

- 6.128 A hotel has recently been granted permission at 29-35 Station Road adjacent to the application site under reference 181930 and this is considered to be a useful guide in terms of how the use is controlled and defined. The C1 use is defined in the S106 agreement of that permission.
- not to let or licence for occupation or permit or suffer occupation of any of the rooms for a continuous period of more than 3 months to the same occupier or occupiers
  - other than those Customers staying in accordance with the above, not to let or licence for occupation or permit or suffer occupation of any room for a continuous period for more than 3 months to the same Customer or Customers
  - not to require Customers of any room to agree to any minimum period of occupation (of whatever duration)
  - to provide to the Council within 14 days of written request evidence regarding the use or occupation of the rooms or any of them
- 6.129 The same controls are recommended, this is especially important in this case as the Applicant has provided very little detail as to the form that the use will take. It is not possible to introduce new s106 controls or conditions controlling fundamental aspects of the permission at Reserved Matters Stage. It is normal practice to limit the length of stay in hotels to ensure clarity between the C1 use and a longer term C3 use.

#### ***Build to Rent 'use'***

- 6.130 The Application proposes upto 750 dwellings. These could be standard open-market housing, or affordable housing, or could fall within the definition of Build to Rent (BtR). Housing within Phase 1 (South Site) is secured as BtR under permissions 190441/2. It is therefore reasonable to make preparation for the possibility of a BtR 'use' at Outline stage on the basis that S106 controls cannot be introduced at Reserved Matters stage and the applicant has not expressly excluded BtR from their proposals (it would otherwise need to be specifically excluded from the permission by condition to avoid being contrary to Policy H4)
- 6.131 Government Policy on BtR is set out in the National Planning Practice Guidance (NPPG accompanies the NPPF) at: <https://www.gov.uk/guidance/build-to-rent>. Build to Rent 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.***"
- 6.132 The guide at national level is for 20% of the dwellings to be Affordable Housing (Affordable Private Rent tenure) on site unless a commuted payment or other form of provision is agreed with the LPA. The matter of Affordable Housing is addressed separately below).
- 6.133 The process for managing affordable private rent units should also be set out in the section 106 agreement. This should set out 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.

- 6.134 Policy H4 in the Local Plan specifically deals with and allows for Build to Rent Schemes. This includes a 20-year minimum period over which the Build to Rent tenure requirement is to be retained (together with other standards). The detailed Heads of Terms are set out in the recommendation section at the head of this report.

#### ***Build to Rent Private Rented Units Clawback***

- 6.135 Market Housing units within Build to Rent are normally secured as forming part of a single managed building. However national guidance does envisage a scenario whereby some or all of the units are sold and no longer form part of a build to rent product.

*"Build to rent schemes would normally, by definition, remain within the rental sector, under common ownership and management, for the long term. Any affordable private rent homes included as part of a scheme, through a section 106 agreement, are provided specifically as a community benefit in perpetuity. The sale of a build to rent scheme, or the sale of individual homes within the scheme to other tenures, should not result in the withdrawal of the affordable housing contribution from the local community.*

*Circumstances may arise where developers need to sell all or part of a build to rent scheme into owner occupation or to multiple landlords or, exceptionally, to convert affordable private rent units to another tenure. The section 106 should consider such scenarios and, in particular, include a mechanism to recoup ('clawback') the value of the affordable housing provision that is withdrawn if affordable private rent homes are converted to another tenure.*

*Consideration should also be given to a covenant period for the retention of private market rent homes in that tenure and potential compensation mechanisms in the event that private market rent homes are sold before the expiration of an agreed covenant period."*

(NPPG Paragraph: 007 Reference ID: 60-007-20180913)

- 6.136 It is noted that national policy is that the LPA "should" include clawback for the Affordable Private Rent units. This is set out in the recommendation and is consistent with the approach secured previously under the extant permissions for the South Site.
- 6.137 The Applicant also requests a similar provision for the private market rent units. The principle is that the presumed increase in value arising from a switch from BtR to market housing should be captured. The use of a formula avoids the need for detailed viability re-appraisal and any financial contribution would be payable towards provision of Affordable Housing off-site.



- 6.138 The 2019 Local Plan was adopted after Committee resolved to grant the extant permissions 190441/2. The explanatory text (paras 4.4.32 to 4.4.34) explains the relationship between viability and retaining Build to Rent long term.

*"It is accepted that as Build to Rent developments are dependent on long term rental income rather than early sales, their funding is inevitably long term, and operates to different viability models compared to for sale schemes. Government policy therefore sees a need for some flexibility, particularly in relation to affordable housing provision. Nevertheless, where such justification is being made, the Council will expect the viability appraisal to also provide information on the viability of the development as a for sale scheme."*

*The Council will expect rental levels for the affordable housing or Affordable Private Rent housing to be related to Local Housing Allowance rate levels (including service charges) and be affordable for those identified as in need of affordable housing in the Borough. An Affordable Housing SPD, to be produced in 2019, will set out further detail. The Council will expect such housing to remain affordable in perpetuity.*

*That policy acknowledges the need to tie such schemes to providing rental accommodation for a minimum period of time, particularly where the planning authority has been flexible over affordable housing provision or in the use of the Affordable Private Rent housing. Therefore, where viability assessments show that the full target affordable housing cannot be provided or where the provider proposes the provision of Affordable Private Rent Housing, managed by the owner of the development, the Council will expect the application to agree to a covenant tying the development to providing solely private rented accommodation for a minimum period of 20 years. Where viability testing demonstrates that affordable housing contributions are unviable, clawback mechanisms will be included as part of the planning permission to recoup the loss of affordable housing if any residential units are sold out of single ownership within the covenant period. Comments on assessing viability within policy H3 and its supporting text also apply to schemes under H4. A charge towards the provision of additional affordable housing will be triggered where any private rented homes are sold within the development within 20 years of occupation of the completed development".*

- 6.139 The following heads of terms are recommended for the current application 192032 and also the proposed deed of variation to the 190441/190442 S106 agreement (as set out in the recommendation section of this report):

*"In the event that the owner of a build to rent development sells or otherwise transfers some or all of the units so that they no longer qualify as build to rent under some agreed variation to the terms of the S106 agreement, the developer is required to provide a valuation of the relevant Build to Rent accommodation immediately prior to the sale/transfer and a valuation of the value following the change to non-Build to Rent. A financial contribution equal to 30% of the increase in value shall be paid to the Council within 3 months of sale/transfer".*

- 6.140 Policy H4 (Build to Rent Schemes) also requires BtR schemes to be secured in single ownership providing solely for the rental market for a minimum 20 year term with provision for clawback of affordable housing contributions should the covenant not be met.

- 6.141 There appears to be an inherent tension in the policy between the required BtR 20 year covenant period and the clawback arrangements that suggest that this might not be met. Presumably any change away from BtR would need to be by agreement (either variation of the S106 or some mechanism within it) to avoid the owner breaching the terms of the legal agreement. The suggested clause above is worded to allow for this.
- 6.142 If the BtR approach is to have any meaningful application it will be important to retain the overall management of the communal areas of the building under one management company for the 20 year covenant period, regardless of ownership of individual units. It will also be important to secure the same access to all facilities for all occupiers regardless of tenure. This is proposed to be written-in to the S106 agreement. This is particularly relevant to the South Site S106 Deed of Variation proposals (190441/190442) as access to facilities and indoor amenity areas was described in the original Committee report as providing some mitigation for minimal floorspace, poor outlook and/or poor daylighting affecting some of the dwelling units.

iv) **Affordable Housing, Housing Need and Development Viability**

*Housing Need and Policy*

- 6.143 Policy H3 requires proposals of over 10 dwellings to provide 30% of the total dwellings to be Affordable Housing and *"In all cases where proposals fall short of the policy target as a result of viability considerations, an open-book approach will be taken and the onus will be on the developer/landowner to clearly demonstrate the circumstances justifying a lower affordable housing contribution."*
- 6.144 Paragraph 4.4.19 of the Reading Borough Local Plan provides some background to the policy and summarises the large amount of evidence that the Council has in respect of the critical need for Affordable Housing that exists within the Borough: *"The Berkshire (with South Bucks) Strategic Housing Market Assessment (SHMA, 2016) has once again emphasised the critical need for affordable housing within Reading as well as the remainder of Berkshire. The SHMA identified a need for 406 new affordable homes per year in Reading, which represents the majority of the overall housing required. The consequences of not providing much-needed affordable homes would be severe, and would include homelessness, households in temporary or unsuitable accommodation, overcrowding and younger people having to remain living with parents for increasing periods. Insufficient affordable housing will also act as an impediment to economic growth, as firms will face increasing problems with accommodation for their workforce. Meeting even a substantial proportion of the identified housing need presents significant challenges, and it is therefore critical that new residential development of all sizes makes whatever contribution it can."*
- 6.145 RBLP para 4.4.23 states *"The target set in the policy has been determined as the result of an assessment of the viability of development of sites of various sizes in the Borough in accordance with the requirements of the NPPF. This will be the expected level of affordable housing provision."*
- 6.146 This is qualified to some extent by RBLP para 4.4.24 states that *"...the Council will be sensitive to exceptional costs of bringing a site to market such as for reasons of expensive reclamation, or infrastructure costs, or high existing use values. Where*

*applicants can demonstrate, to the satisfaction of the Council, exceptional difficulties in bringing a site to market, the Council will be prepared to consider detailed information on the viability of a particular scheme and, where justified through an open book approach, to reduce the affordable housing requirement..."*

#### *Comparison with Extant Permissions*

- 6.147 Comparison with SH3 is of only limited usefulness in this case. The current proposals are proposed under a new Local Plan with a substantial increase in the amount of development proposed in a different arrangement and with a different range of potential uses. The current proposals require Affordable Housing on the basis that dwellings are now proposed for the North Site which weren't proposed under the extant permission (up to 65,000sqm and up to 750 no. Class C3 dwellings). It is considered that the current application no longer represents a continuation of the 130436/151427/190441 ("SH3") proposals and SH3 provides limited 'precedent' for the latest proposals.
- 6.148 For reference, the extant permission secured (in summary), 5% Affordable Rent (rent at LHA level) on site, 5% Shared Ownership on site, a contribution of £4.2 million (equivalent to 10% provision) for off-site provision and a deferred payments mechanism for the remaining 10% subject to viability and realised sales values and costs, in order to capture any increase in profit.

#### *Viability Assessment*

- 6.149 A fundamental point of disagreement that throws doubt on the Applicant's viability assessment is that the Applicant does not consider it reasonable to model a scheme at the maximum parameters sought by the application. Officers disagree with this view, as any valuation which assumes less than the maximum serves to understate potential viability. It must be assumed that the maximum number of dwellings at the maximum parameters applied for could be provided. i.e. if the amount applied for is up to 750 dwellings, the viability assessment should be based on the assumption that this could be provided. Any lesser figure is simply speculation and cannot be relied upon.
- 6.150 The Applicant has stated that the average sale value would be £543.75 per sq/ft equating to £5,852.93 per sqm. There is still disagreement over the viability assessment methodology and outputs and there remain some ambiguities in the Applicant's figures and this figure should therefore be treated with caution. However, assuming for the purposes of assessment that this value is correct, this gives a residential value of £198,177,300 [One hundred and ninety eight million, one hundred and seventy seven thousand, three hundred pounds]. The overall scheme GDV is said to be £596,399,343 [Five hundred and ninety six million three hundred and ninety nine thousand three hundred and forty three pounds].
- 6.151 A policy-compliant amount of Affordable Housing would be 225 dwellings on site (30% of 750) assuming the maximum number of dwellings were provided. A pro-rata approach to provision would be the expected approach, i.e. 30% of however many dwellings are proposed under Reserved Matters.

- 6.152 Policy H3 places the onus on the developer/landowner to justify any lower affordable housing contribution. The supporting text to Policy H3 refines this, explaining that costs need to be “exceptional costs of bringing a site to market”. It is considered that the types of costs referred to in the Local Plan relate to problems with a site itself; expensive reclamation, infrastructure costs, or high existing use values etc. The cost of a particular design, or design choices, is not considered to fall within this type of exceptional cost; unless the design options are so limited as to prejudice the site coming forward for development in general. This is not the case with Station Hill which has been subject to a number of different permissions and design solutions and has been thoroughly examined through the Local Plan allocations process.
- 6.153 The Applicant persists in suggesting that “...*the scheme is not currently financially viable, due in large part to the significant infrastructure cost involved in delivering the proposed scheme and greatly improved public realm*”. The Applicant suggests that these costs include the combined provision of open space and public realm improvements at Station Square, the new Pocket Park, the Central Plaza, the link bridge, podium, steps to podium and associated landscaping, together with utilities infrastructure are in fact infrastructure costs to be considered as part of the viability. Officers are firmly of the view, and have repeatedly advised the Applicant, that whilst these are indeed costs, they are not additional to what might reasonably be required as basic requirements of the proposed design approach and/or development plan policy. The open space for instance, is not an ‘optional extra’ given the scale and amount of development proposed. If omitted it would be necessary to secure payments towards open space provision/improvements elsewhere under Policy EN9. Policy and site constraints do not necessarily limit the design of the open space to an expensive podium deck option.
- 6.154 However, both the applicant and the Council’s Valuer, (advised by BPS Surveyors) agree that the current scheme is in significant deficit and based on the figures provided would not be viable to build, due to the costs involved with the particular design. There are, though, significant disagreements over the relevance of those costs to viability.
- 6.155 Based on the applicant’s viability submission, the scheme shows an overall scheme deficit of £23.8m which equates to -4.11% return on GDV before profit (or £113,282,859 equating to -19% return if the target profit of 15% of GDV is incorporated) and this assumes no CIL, no on-site affordable housing and £5m S106 of which £1.5m is the proposed affordable housing contribution.
- 6.156 Viability must be based on justified costs and evidenced values. The scheme design has significant costs associated with constructing the podium which at this stage appears to offer questionable financial benefits in relation to its costs of provision. The podium is the key reason why this site would not be able to provide affordable housing.
- 6.157 Whilst the podium design and large basement are considered to be acceptable in design terms, it is not a direct policy requirement and there are various ways of achieving the north-south route through the site. It is a matter of fact that the Local Planning Authority have recently approved a design which does not include a podium as approved under references 190441 and 190442 in December 2019 (re-approval of the SH3 scheme). Clearly there are benefits to the podium in providing a flat route at the level of the main station entrance. There are also negative aspects to the approach including treatment of podium edges, dead frontages, security of

undercrofts, requirements for passenger lifts, and limits to the extent of tree planting on the raised deck platform. The Pocket Park is a direct product of the podium design and is required to make the scheme acceptable in Planning terms (as explained elsewhere in this report), but is also an additional cost. The podium is perhaps best described as a neutral benefit in Planning terms. It has public benefits in terms of level access to main areas of the site but also benefits to the developer in terms of providing parking, servicing and additional 'back of house' floorspace etc.,. Fundamentally it is not essential to bringing the site forward to market. It is not an exceptional or 'abnormal' cost and should be discounted from Viability considerations to a large extent. This is not to say that it should be physically removed from the proposals, but it is not an essential to "bring the site to market". It is Officers' firm opinion that the LPA should not subsidise such aspects of a scheme at the expense of Affordable Housing. Specifically the need for the expensive podium and basement design is not considered to outweigh the critical need for Affordable Housing that exists within the Borough.

- 6.158 The NPPF and the Council's policies allow for viability considerations to reduce the provision but only in specific circumstances. An overly expensive design is not necessarily a justification. Paragraph 57 of the NPPF 2019 states that "The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force."
- 6.159 National Planning Practice Guidance Paragraph: 007 Reference ID: 10-007-20190509 Revision date: 09 05 2019 states that: *"Where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage... Such circumstances could include, for example where development is proposed on unallocated sites of a wholly different type to those used in viability assessment that informed the plan; where further information on infrastructure or site costs is required; where particular types of development are proposed which may significantly vary from standard models of development for sale (for example build to rent or housing for older people); or where a recession or similar significant economic changes have occurred since the plan was brought into force."*
- 6.160 The site is allocated in the Local Plan and was subject to viability testing. The current Local Plan is very recently adopted in November 2019 and the submitted viability assessment was prepared in December 2019. The two are concurrent and unlikely to be affected by a sudden change in circumstances in terms of their relevance to one another. It is accepted that the current financial situation due to Covid19 will have had some impact, however the situation is changeable and far from settled and no viability assessment has been submitted in support of any new circumstances. In fact the changeable nature of the current situation is likely to make assessment extremely difficult and uncertain. Using the submitted December 2019 viability assessment is considered to be a more reliable measure of viability in normal circumstances for the time being.

*Negotiated Position*

- 6.161 Affordable Housing provision has been the subject of prolonged discussions with the applicant. Initially no Affordable Housing was proposed which subsequently increased to a £1.5 million payment in lieu to provide Affordable Housing off-site elsewhere in the Borough (equivalent to approximately 0.76% Affordable Housing provision based on the Applicant's values). Officers explained to the Applicant that the application would not be recommended for approval at that level due to a complete failure to meet housing need which would not be outweighed by any of the public benefits of the proposed development.
- 6.162 A negotiated position has since been arrived at whereby 10% of the housing units would be secured on-site within Phase 3 (there is no housing proposed in Phase 2). This would be on a plot-by-plot basis within Phase 3 as each plot could be delivered separately under the proposed flexible approach, and the overall maximum number of dwellings to come forward within Phase 3 (on which to base the 10%) would not be known until the final plot is delivered.
- 6.163 The remaining 20% would be subject to a deferred payments mechanism to capture any increased profitability for further investment into Affordable Housing elsewhere in the Borough. The heads of terms are set out in the recommendation at the head of this report.
- 6.164 The negotiated 10% on site is a significant improvement on the initial offer. However it remains well below the 30% required by Policy H3 and must be considered harmful in terms of meeting housing need on the basis that the 30% requirement is the product of detailed assessment of this need as evidenced during the preparation and adoption of the policy.
- 6.165 The remaining 20% is subject to a deferred payments mechanism. In determining this application and deciding on the weight to give to this it should be remembered that the viability assessment suggests that a large shortfall in profitability and a large increase in profit would need to occur before any deferred payments would be triggered.
- 6.166 The proposals do not specifically exclude Build to Rent and this could come forward as part of the scheme. This has specific local policy (H4) and national policy requirements associated with it. Mostly this relates to on-site Affordable Housing which is not currently proposed.
- 6.167 In conclusion, Policy H3 is considered to be up-to-date (it was adopted at the same time as the viability assessment was submitted by the Applicant). The submitted assessment places the scheme in significant deficit and, even with the Council's concerns over elements of the methodology and assessment, all parties agree that the proposals would be unviable as presented. However the *reasons* for this unviability do not justify a reduction in the amount of Affordable Housing when considered against policy tests. The unviability lies with the design of the scheme itself rather than exceptional costs associated with the constraints of the site and bringing it to market, in fact a scheme without the expensive podium and basement has recently been granted permission under ref 190441. The viability assessment demonstrates that the scheme would be unviable and would not come forward with or without any Affordable Housing. It is of little usefulness in decision-making in this respect.
- 6.168 The substantial harm in terms of the failure to meet identified housing need and the critical need for Affordable Housing in particular and associated aims of achieving

mixed and balanced communities is contrary to Policy H3 (and H4 in respect of Build to Rent). This harm will need to be weighed against other material considerations, including the wider benefits of the scheme if the proposals are to be considered acceptable. This is addressed within the overall planning balance at the end of this report.

### *Other financial matters*

- 6.169 The applicant has also requested that:  
*"the Council should also agree to the following:*  
i) *The removal of the advertising screen in Station Square*  
ii) *Strategic agreement with Reading not to do anything on their land or any other strategy/initiative in Reading that could reasonably erode the principles, management and operation of Station Hill - ie we wouldn't want Reading putting on a food market in the main station area, should we have our own initiatives to do so. We would seek to agree this as part of the public realm and community strategy within the S106.*  
iii) *Oversailing right/ownership along Station Hill, to potentially extend buildings northwards."*  
Officers advise that these are private matters between the Council as landowner and the applicant. These matters are not relevant to Planning and should have no bearing on the determination of the application.
- 6.170 The applicant has also requested that the Council agrees to pay half the cost of providing the Pocket Park approx. £900k as much of it lies on Council Highway land. Officers have been clear that the Pocket Park is a fundamental part of the design of the scheme, and a direct result of the podium design and its extent northwards. Funding sources for the proposal are not a matter for the Planning Authority. Where there is any cross-over into development 'viability' it is apparent that the disagreement over relevance of the podium cost is directly relevant to the Pocket Park and is explained above. The cost has been designed in to the scheme at the discretion of the Applicant.
- 6.171 This leaves the possibility of the Council investing in the scheme as landowner. It is vital that such matters are not allowed to have any bearing on the determination of the application whatsoever as this would be a clear conflict of interest.

### v) Social and Cultural Infrastructure

#### *Public Art and Culture*

- 6.172 The extant permission secured public art to the value of £1.6 million across the Station Hill Site with at least 20% of the value to be provided on the Phase 1 South Site. This figure is subject to indexation from the date of the original 2015 permission (130436) and was calculated as £1,847,367 when the current application 192032/HYB was received. This leaves a figure of £1.47 million for the North Site under the extant permission. This has been used as the basis for the current scheme.

- 6.173 The NPPF identifies *"a social objective in achieving Sustainable Development - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being"* (para.8)
- 6.174 Para. 92 of the NPPF states that *"To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*  
*a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*  
*b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community..."*
- 6.175 The Design South East panel were concerned about an overly 'corporate' commercial character and urged the developer to introduce more of a balance with the 'civic', more balance between 'Social' and 'Economic'.. Para. 92 of the NPPF (above) supports cultural and social infrastructure in decision making. Reading Borough Local Plan Objective 8 is to *"Offer outstanding cultural opportunities, which are based on multiculturalism, local heritage and high quality, modern arts, leisure and visitor facilities"*.
- 6.176 Policy CR4: Leisure Culture and Tourism in Central Reading states *"The Central Core will be the prime focus for major leisure, cultural and tourism development, Leisure, cultural and tourism uses that would attract a wide range of people into the centre will be encouraged"*.
- 6.177 *Supporting text to Policy RL2 (para 4.6.8)* explains that *"The most suitable location for retail, leisure and culture development is in existing centres. These centres already have a range of facilities, and are generally accessible by a choice of means of transport. Development in these centres should maintain and enhance the centres' vitality and viability. The centre of Reading is the most accessible location in the Borough, and is among the most accessible locations in the South East, and therefore represents the best location for major development of this type"*.
- 6.178 Policy CC9 Securing Infrastructure allows for community facilities and leisure and cultural infrastructure to be secured by S106. It is apparent that SH is the largest and arguably most accessible development in the Centre and should lead, be exemplary, in terms of integration with existing culture and make provision for cultural needs of future residents and visitors to the site. A public art and cultural strategy was developed internally with the Assistant Director of Culture (involving meetings with local stakeholders, including Reading Museum and local arts groups). This was presented to the applicant as a useful resource to inform their own strategy with the intention that it would be funded by a proportion of the previously agreed Public Art contribution and would serve to broaden its scope to include other cultural infrastructure as well as art.
- 6.179 The Applicant has not fully engaged with the suggested strategy despite not offered a meaningful alternative (the submitted 'Playbook' is very general in nature and doesn't demonstrate engagement with existing local groups). A strong cultural dimension to the scheme is considered to be essential to its acceptability, given the



Local Plan objective, national policy and the advice of local experts. Following extensive negotiations, officers have agreed a similar approach to the extant permissions with a scheme to the value of £1 million towards public art and cultural infrastructure within the site and its surroundings, to be split evenly between Phase 2 and Phase 3 submitted for approval and to include a timetable for provision. The amount has been adjusted downwards from £1.4m during the negotiations with the applicant as a means of securing the £200k contribution towards the station underpass improvements and in recognition of the rent-free use of the public realm and eventual provision of a permanent cultural facility within Phase 3 (see below). It is considered that this is a reasonable approach. It is considered that, although this leaves a degree of uncertainty over the form the provision will take, it remains a substantial amount to be invested in art and culture and the LPA would retain sufficient control to shape the scheme once permission is granted. This is consistent with the approach taken on the extant (SH3) permissions.

- 6.180 In addition, rent-free use of areas of outdoor public realm for cultural/arts are to be secured as per the advice from the Asst. Director of Culture. Officers have negotiated 10 days a year on this basis. This could be a benefit to arts and cultural groups as access to suitable spaces for performances etc, and rental costs could otherwise be a barrier to events taking place.
- 6.181 Once phase 3 is delivered then a cultural space will be identified within one of the buildings, for 15 years on a peppercorn rent (similar size to the existing Biscuit Tin structure fronting Station Hill - approx. 70sqm floor area). The Council's Assistant Director for Culture has considered the usefulness of the space in consultation with local cultural/arts groups. Feedback is that it is likely to be too small for many users nevertheless officers consider that this will make a contribution towards the cultural/arts offer, although it is difficult to determine the weight attributable to it without more clarity on hours of access, potential users, the nature of the refurbishment or the design of the space to be provided in Phase 3 once built. Taken together the rent-free use of outdoor public realm and the use of a small area of the Phase 3 buildings would offer a degree of compensation for the £400k reduction in the contribution referred to in the paragraph above, noting that the benefits are qualitative and not easily quantified in monetary terms.
- 6.182 The suggested requirements are set out in the Heads of Terms section of the Recommendation above.
- 6.183 It is noted that the applicant has not fully agreed the S106 heads of terms as originally suggested. Nevertheless officers are of the opinion that sufficient arts and cultural elements are now secured to ensure appropriate Social infrastructure and to avoid an overly commercial, corporate character which would otherwise fails to integrate effectively with the existing culture of Reading.

vi) **Amenity (Neighbouring Occupiers, Future Occupiers).**

- 6.184 In general, the nature of the proposal as an urban, large scale, high density, residential scheme has been established by the site-specific policies and the extant outline permissions. The scale of buildings supported by these policies will inevitably impact on the surrounding area and the amenity of occupiers/users of surrounding buildings and spaces.

### *Daylight and Sunlight*

- 6.185 Officers have commissioned an independent assessment of the daylight and sunlight characteristics of the current proposals from Hollis LLP, who also advised the Council on the South Site proposals.
- 6.186 Hollis have reviewed the methodology set out in both the applicant's Daylight/Sunlight report and Environmental Statement (EIA) Chapter 14, and as a whole agree with the methods used.
- 6.187 Phase 3 has been submitted in outline and therefore the actual levels within the proposed accommodation are likely to vary significantly due to a number factors, for example, the room sizes / layouts, the façade design including balconies and the orientation and sizes of the window openings in the facade. More detailed assessments will therefore be required once the design has been fixed. A condition is recommended to secure this at Reserved Matters stage
- 6.188 The ES also describes the impacts on surrounding properties. It is important to note that for Phase 3 these have been assessed against the maximum parameters in terms of height and massing. The amount of floorspace applied for, the parameter plans and design codes will not allow the buildings to be developed to this scale.
- 6.189 Hollis and the applicant agree that the following addresses are those affected in terms of daylight and sunlight:
- 1-15 Tanfields, Vachel Road
  - Reada Court, Vachel Road
  - 1-29 Sackville Street (odds)
  - 5-21 Tudor Road (Friary Court)
  - Alexia Court, 3 Tudor Road
  - 9-11 Stanshawe Road
  - 5-19, and 25 Vachel Road (odds)
  - Belmont Court, Vachel Road
  - 20-24 Vachel Road
  - Montrose House, Vachel Road
  - 8-18 Stanshawe Road (evens)
  - 13-19 Stanshawe Road (odds)
  - 32-34 Friar Street
  - 18-29 Regent Court
  - 21-23 Vachel Road
  - 30 Garrard Street
  - 125 Friar Street
  - 127 Friar Street
  - 136-137 Friar Street
  - 144 Friar Street
  - 1-29 Projection East, Merchants Place
  - 1-41 Icon House, Merchants Place
  - 1-45 Projection West, Merchants Place
  - 7-11 Station Road
  - 49-51 Greyfriars Road
  - 53 Greyfriars Road
  - Bridewell & Samuel House, Greyfriars Road -Student Housing
  - The Gateway Public House, 31 Greyfriars Road

- Malcolm Place, Caversham Road
- 27-31 Vachel Road
- 52-55 Friar Street and 12 Greyfriars Road consented scheme - considered as future sensitive receptor.
- Station Hill - Plots E and F considered as future sensitive receptor

6.190 Most of those affected would suffer negligible or only minor adverse affects as defined in the ES. Others would suffer moderate to major adverse effects. Those particularly affected are discussed below:

1-25 and 29 Sackville St (odds)

Views of the sky would be moderately or majorly affected for 8 out of 67 windows within these terraced properties. Overall the effect is assessed as minor adverse as the harm is limited to a small number of windows. It is also capable of further mitigation at Reserved Matters Stage to a degree.

1-29 Projection East would have 22 windows adversely affected. However these windows already suffer a lack of daylight due to the architecture of the building and dense urban layout. Importantly the impact is not assessed as being materially different to that of the extant permission.

1-41 Icon House would have 12 rooms affected at minor or major adverse levels. Six are affected by the existing dense urban environment. Four are already limited by overhanging balconies and two are within an existing lightwell. The impact is not materially different to that of the extant permission.

1-45 Projection West would have 72 adversely affected windows. The dense urban setting, the existing poor daylighting of parts of the building and the presence of overhanging balconies are all contributory factors even without the proposed development. Again, importantly the impact is not materially different from the extant permission.

30 Garrard Street would have 213 of 250 windows adversely affected. Similar to properties above, the dense urban location means that many have low existing levels. Nevertheless 58 of the rooms would experience a change in excess of 40% which is identified as major adverse in the ES. Whilst some change would occur it is noted that this property was converted under an Office Prior Approval (daylight not a consideration) in 2014 after the extant permission 130436 had been granted. The submitted ES (methodology agreed by Hollis) concludes that the vast majority of effects will not be materially different from the extant permission. The existing poor daylighting and dense urban environment is also highly relevant. Officers also consider that it would not be appropriate for an Office Prior Approval scheme to prejudice the development of this major allocated site or limit its development potential.

32,33,34 Friar Street - Moderate adverse impacts are identified to some windows at these addresses. However these are already affected by the existing built environment and this distorts the changes arising from the proposal. Importantly, the change would be no worse than the extant permission.

49-51 Greyfriars Road - All 33 windows would suffer major adverse effects according to the ES. "This building captures all its light from across the Site, which in the Baseline Scenario is underdeveloped given its central location. As a result, any significant development of the Site would lead to reduced levels" As with 30

Garrard St this building was converted to flats under an OPA granted in 2014, after extant permission 130436 was granted. The ES concludes that the effect will be no worse than that of the extant permission.

5-9 Vachel Road (odds) - Three out of thirteen rooms would be moderately affected in terms of views of the sky. This is for the worst-case maximum parameters for Phase 3 and is possible of further refinement at Reserved Matters stage. The overall effect is considered to be minor and commensurate with the type of development proposed for the site.

53 Greyfriars Road - Seven windows facing east towards the site would suffer moderate or major adverse effects in terms of access to skylight/daylight and five would suffer similarly in terms of views of the sky. The ES concludes that, the majority of windows/rooms retain levels of VSC and NSL that are not materially different from the 2016 Consented Scheme as Amended. It is also noted that the site is currently underdeveloped and is subject to policies which support buildings of significant 'dramatic' scale.

9-11 Stanshawe Road - Four windows would suffer a major adverse effect in terms of access to skylight/daylight. Three windows would have major or moderate reductions in views of the sky. The ES notes that the majority of windows retain levels that are not materially different from the extant permission.

Alexia Court - 3 Tudor Road - 12 windows would be affected with 10 suffering a major adverse effect in terms of access to daylight. Two bedrooms would suffer major adverse effects in terms of views of the sky. The ES notes that the majority of windows retain levels that are not materially different from the extant permission.

Bridewell and Samuel House Friar Street - 21 out of 67 windows would experience a moderate adverse effect in terms of access to daylight with 7 windows suffering a major effect. The worst affected are located in a lightwell and are mostly affected by the architecture of the host building itself. 16 windows would experience moderate to major adverse effects in terms of views of the sky. The ES notes that the majority of windows retain levels that are not materially different from the extant permission.

The Gateway Public House - 31 Greyfriars Road - 5 of 11 windows would experience major effects in terms of loss of views of the sky. The ES notes that "this building captures the majority of its light from across the Site, which in the Baseline Scenario is underdeveloped given its central location. As a result, any significant development of the Site would lead to reduced levels of VSC and NSL levels". The ES finds that the availability of daylight will remain comparative to the extant permission. Views of the sky will be more affected than with the extant permission presumably due to the increased height of Plot B. It is considered that this is not necessarily harmful provided overall access to daylight remains. Also the tall buildings allowed on the application site arguably justify the change which is not necessarily limited to previous permissions/alternative development proposals.

Malcolm Place (west side of Caversham Rd/IDR) - 6 out of 39 rooms would experience either moderate-adverse or major-adverse changes in access to daylight based on the maximum parameters (worst-case). The overall effect is assessed as minor to moderate adverse given the relatively few windows affected and the fact that the assessment is based on the maximum worst case parameters. It is also

relevant that the site is some distance to the east and would not affect outlook or cause overbearing effects which might worsen the overall effect on amenity if the sites were closer.

The ES also assesses future developments:

52-55 Friar Street and 12 Greyfriars Road - The Proposed Development leads to alterations in daylight availability and views of the sky but the majority of alterations will be consistent with those of the 2016 extant permission and the potential reduction in light levels would have been known when permission was granted for this scheme.

Station Hill Plot E and F - This site is under the control of the Applicant - Unsurprisingly, reduced levels of light would be experienced along the Garrard Street façade of Plots E and F. The ES notes that the worst-case scenario of the Phase 3 parameters would not be built out and the setback and articulation of buildings (for instance the shoulder to Plot D and the gap between D and G). It is considered that the likely impacts are not unexpected given previous permissions for the site, the dense urban character and the policies for tall buildings at this location.

In terms of sunlight, measured in Peak Sun Hours (PSH) (the average solar radiation a certain location receives throughout the day) eight locations would experience moderate or major adverse reduction in PSH:

1-29 Projection East - although the design of the host building and surrounding urban context are contributory factors. There would be no material change compared with the extant permission

1-41 Icon House - six rooms are moderately or major-adverse affected. Overhanging balconies and the orientation of the building itself are partially the cause. The ES concludes that the proposals would not result in a material change compared with the extant permission

1-45 Projection West - six rooms would be moderately or majorly affected. Again Overhanging balconies and the orientation of the building itself are factors. The ES concludes that the proposals would not result in a material change compared with the extant permission.

30 Garrard Street - 25 rooms would suffer a major adverse effect in terms of daylight. The ES advises that this is not materially different to the extant permission. This property was converted to residential under an OPA (see daylight section above).

49-51 Greyfriars Road - All 22 rooms would suffer major adverse effects in terms of loss of sunlight. These single aspect units were converted under an OPA (see daylight section above). The impact on 64% of the rooms is the same as the extant permission. The remaining 8 rooms would experience a 2% to 3% change compared to the extant permission which is not considered to be a significant worsening.

53 Greyfriars Road - All rooms would suffer a major adverse effect as this property receives all its sunlight from across the application site. Noting the underdeveloped nature of the site and the policy support for tall buildings, a reduction in sunlight is considered to be an inevitable result of redevelopment. Six of the rooms would experience between 3% and 4% worsening in PSH compared with the extant permission as a result of the increased height proposed. However this is considered to be a relatively minor worsening compared within the development already approved.

9-11 Stanshawe Road - One room would be major-adversely affected but the impact would not be materially worse than already approved.

Alexia Court - 3 Tudor Road - three rooms would be affected moderate-adverse or major-adverse. This would be a 4% worsening over and above that of the extant permission which is not considered to be particularly significant in terms of the additional impact.

The Gateway PH - 31 Greyfriars Road - All four rooms (bedrooms) assessed would suffer major adverse effects in terms of loss of daylight. This would be a 5% worsening in addition to the extant permission which is not considered to be particularly significant in terms of the additional impact. The major adverse impact identified is commensurate with the extant permission and is considered reasonable given the proximity to the site which is allocated for dense urban development including tall buildings.

Malcolm Place - 4 of 39 rooms assessed would experience a major adverse impact. The ES notes that this is based on the worst-case scenario, which can be mitigated at detailed design stage.

- 6.191 The ES also assesses the effects of night-time lighting on neighbours and finds the impacts to be acceptable, subject to restrictions on hours of lighting for offices (dark after 11pm). A condition is recommended to secure this.
- 6.192 Hollis, acting for the Council, confirm that they agree that the identified properties are the only properties with receptors in sufficiently close proximity to warrant consideration in terms of daylight and sunlight amenity impacts. They also agree with the approach and significance criteria used throughout the assessment scenarios in the ES Chapter, and the conclusion that these properties will not materially differ from the 2015 Consented Scheme.
- 6.193 Hollis advise that the majority of the surrounding properties will be moderately affected in terms of daylight and sunlight levels during each phases of the development. When compared with 2015 Consented Scheme those properties previously assessed will yield similar results in terms of impacts and affects, where these deviate they will be both small in nature and number. The Cumulative Scenario assessment also yields results of minor to moderate affects, with no significant changes noted when compared with the completed Development Scenario.
- 6.194 The 'light' aspects of the proposals are considered to be in accordance with Policies CC8 and CR10 on this basis.

#### ***Privacy***

- 6.195 The proposed office on Plot G would allow a degree of overlooking towards residential properties within Plots E and F of the extant permissions (under the control of the Applicant) and also to dwellings in Garrard House (30 Garrard St). It is unlikely that this would be significantly different to that which could result from the extant permission on Plot G and the intervisibility would be between public-facing parts of the building fronting Garrard Street.
- 6.196 The location and potential uses of plots A, B and D could also allow views out onto Plot E of Station Hill, 20-30 Greyfriars Rd and nos 9 to 53 Greyfriars Rd (odds). As

with Plot G. The outlook would be across the public realm towards public-facing parts of these neighbouring buildings.

- 6.197 Privacy within the scheme itself would rely largely on the final design at Reserved Matters stage. The spacing of 18 metres façade to façade for a mixed use scheme should be sufficient to allow a suitable design to come forward, in this dense urban context.
- 6.198 The way in which new development would face neighbouring dwellings across public streets (i.e. front-to-front rather than back-to-back), together with the clear policy backing for very tall, high-density development in this location, suggests that the proposals would be acceptable in terms of privacy.
- 6.199 The privacy aspects of the proposals are considered to be in accordance with Policies CC8 and CR10 on this basis.

#### ***Outlook***

- 6.200 Outlook from the Plot G office would be good from most floors and would be appropriate for the office use.
- 6.201 Outlook from residential properties and other uses within Phase 3 would be examined more closely at Reserved Matters application stage. However, given the acceptable daylight assessment above, it is considered likely that suitable outlook will also be achievable in accordance with Policies CC8 and CR10.

#### ***Overbearing Effects***

- 6.202 The very tall buildings proposed will undoubtedly have an overbearing effect on their surroundings and is perhaps an unavoidable result of the dramatic increase in scale envisaged within Policy CR10 and the RSAF. The scale of the buildings cannot be 'hidden' and the only way of ensuring no impact would be to locate buildings well away from the surrounding streets, which is not the approach set out in policy, including the RSAF. The degree of any overbearing effect would be subjective and different people will experience it differently, but the reasonably positive findings of the daylight and sunlight assessments, which are matters associated with overbearing effects, tend to suggest that the buildings would not be excessive in this regard, in accordance with Policies CC8 and CR10.

#### ***Noise and Disturbance***

- 6.203 The Council's Environmental Protection Team (EP) has considered the various studies included in the ES regarding noise affecting residential uses within the scheme. EP acknowledges that the design of the residential aspects of the proposals and the mix of uses has not yet been finalised as they lie in Phase 3. Conditions are recommended to mitigate, including noise assessments for noise insulation for new dwellings. Assessment of any noise generating equipment (air conditioning, refrigeration, kitchen extract etc). Gym uses can be particularly problematic with structure-borne noise and vibration affecting occupiers of the building and any future noise assessment should address this.
- 6.204 Recommendations in respect of hours of use, hours of deliveries and hours of construction and demolition are also noted and incorporated in the recommendation.

- 6.205 The proposals are considered to be acceptable on this basis in accordance with Policies CC8 and CR10.

#### ***Outdoor Amenity Space***

- 6.206 The proposals range between zero and 750 dwellings. It is considered that sufficient space exists to provide balconies, terraces and roof gardens for residents, but also within the northern leg of the space between Plots A and C which is not on a route through the scheme and could offer some semi-private amenity areas which would benefit residential occupiers. The site also provides good quality areas of public realm which will benefit occupiers of any dwellings provided within Phase 3.
- 6.207 It is considered that the design allows sufficient potential for appropriate amenity space provision for future occupiers to be secured at Reserved Matters stage in accordance with Policy H10.

#### ***Indoor Amenities (Build to Rent)***

- 6.208 Good quality indoor amenities are a defining characteristic of the Build-to-rent model where (if) this is proposed (it is not specifically excluded) and it will be necessary to define and secure provision and retention of the indoor amenity floorspace and uses within the S106 agreement (with some flexibility for changes to the types of amenities built in to the agreement to allow for changing needs and wants over time). These amenities must be made available for all occupiers of the building across all tenures to ensure equitable access to the benefits of the Build to Rent model of housing and this is in line with the approach agreed on the South Site under permissions 190441/190442. This is to be secured in the S106 legal agreement and is in accordance with Policies H4 and National Planning Practice Guidance.

#### **vii) Sustainable Transport**

- 6.209 Policy TR1 states that *"All development proposals should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling"*. The overarching policy priority is therefore to secure sustainable modes of transport.
- 6.210 Policy CR2 requires development to contribute *"towards enhanced ease of movement through and around the central area"*.
- 6.211 Policy CR11 requires development in the Station/River Major Opportunity Area to *"Help facilitate greater pedestrian and cycle permeability, particularly on the key movement corridors. North-south links through the area centred on the new station, including across the IDR, are of particular importance"* and Policy CR11c specific to Station Hill and Friars Walk requires *"enhanced links through the site, including in a north-south direction into the Station Hill area and through to the station, and a network of streets and spaces"*.

#### ***Walking***

- 6.212 The Committee report on the proposals for the South Site (190441/190442/190465/190466) noted that Friars Walk would provide a good quality direct route for pedestrians which would offer a traffic-free alternative to the often overcrowded Station Road. It noted that the route would be less successful at the junction with Garrard Street due to the drop in levels if an appropriate revised design for the North Site is not forthcoming in the future and that that was a



weakness of the approach, which seeks to vary the South Site design without a corresponding revised design for the North Site having been secured.

- 6.213 The proposed new bridge (under ref. 192032) and corresponding changes to the South Site under 200822/NMA and 200823/NMA are considered to provide an acceptable solution to the concerns raised above. It will be necessary to provide the bridge prior to first occupation of Plot G to ensure appropriate accessibility to the new buildings and to comply with policy aims to provide north-south links through the site and beyond. The public passenger lift at the north east corner of Plot E is already secured by S106 agreement and it is considered that this will provide adequate access to Garrard Street level to serve the area of the site around the bridge.

### *Cycling*

- 6.214 Policy TR4: Cycle Routes and Facilities states that:  
*"Developments will be expected to make full use of opportunities to improve access for cyclists to, from and within the development and to integrate cycling through the provision of new facilities. Development of new facilities for cycling, such as cycle hire points and cycle parking, will be acceptable."*

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

- 6.215 The Station Area Framework (SPD), as well as policy in the Local Plan (see above) seek to improve North-south routes through the town centre. It is considered that links north to Christchurch Bridge and southwards to the town centre (West Street, St Mary's Butts, Kennet Cycleway) should be fully integrated and facilitated by the Station Hill proposal given its size, location and strategic importance.
- 6.216 It was accepted previously (July 2019 PAC report for 190441/190442/190465/190466) that the South Site (Plots E and F) have a limited contribution to make in terms of establishing improved cycle routes with the current scope realistically limited to ensuring cycling through Friars Walk.
- 6.217 The North Site has a much wider role to play in establishing improvement. The Applicant previously submitted a Cycling Strategy (TN009 V3, recd. 2/7/19) which confirmed that cautious and considerate cycling will be permitted through Friars Walk (this is secured under the 190441/190442 S106 legal agreement) but that cyclists will be encouraged to use cycle routes around the edge of the site. This is considered to be the best approach as it would allow cycles to access destinations within the Station Hill site itself and the limited number of destinations in the southern station square. This would encourage fast commuter or through-route cycling around the edge of the site, which is likely to be preferable for cyclists and pedestrians alike. The 2019 PAC report concluded that *"the success of this strategy will be heavily dependent on the Applicant proposing high quality, direct, convenient and safe cycle routes that link with existing routes beyond the site boundary as part of any future proposals of the North Site. This will need to include new, suitably designed cycleways on Greyfriars Road, Garrard Street, Station Road*

*and through the Station Underpass. These would need to link seamlessly with ongoing routes west via Stanshawe Road, north from the underpass towards Christchurch Bridge, and east via Station Road, Station Approach and Forbury Road. Failure to secure this would inevitably result in unnecessary conflict between different modes of transport".*

- 6.218 The public realm within Greyfriars Road is mainly on adopted Highway. It is apparent that, whilst cycling is proposed to be allowed through the centre of the site (it is already secured under the South Site (190441/190442) S106 legal agreement), the intention is that this is mainly to allow cyclists to reach destinations within the scheme or the station and does not allow for through traffic. There is no direct cycle route between the levels down to the station underpass and the landscaping is not specifically designed with cycling in mind. It is therefore very important that an alternative route is provided to benefit both cyclists and reduce conflict with pedestrians in order to achieve the north-south route set out in policy.
- 6.219 It is also considered that a development of this scale should seek to integrate effectively with the edges of the site. The proposed scale of buildings will sit in stark contrast to the lower scale development around it, especially to the south and west and should not simply stop abruptly without appropriate landscaping. If this cannot be incorporated within the site, it should take the form of street tree planting, integrated within the new on-carriageway cycleway and shared pedestrian/cycle footway arrangement on Greyfriars Road. It is considered that this is supported by Policies EN12, EN14, and CR3 and a scheme for its provision, including the submitted landscaped cycleway design is recommended to be included as a S106 obligation.
- 6.220 After lengthy discussions the applicant and officers have agreed to a two-stage approach with a functional on-carriageway cycleway being provided running the full length of Greyfriars Road, linking Friar St/West Street down to the junction with Greyfriars Road concurrent with development of Phase 2 function as direct mitigation for the lack of cycle route provision through the site as part of the north-south route. The final works to provide a shared footway/cycleway alongside the on-carriageway route, and to provide street trees would be secured as part of Phase 3, once the final design and layout of the Phase 3 buildings and associated landscaping is known and has been submitted at Reserved Matters stage.
- 6.221 The north-south cycleway would link with an on-carriageway advisory route along Garrard Street and a shared footway/cycleway east-west along Station Hill linking to the station underpass.
- 6.222 The only direct link north-south from the site, across the railway and aligning with Christchurch Bridge is via the existing Station Underpass. Cycling is not currently permitted through this tunnel because the current arrangement has insufficient headroom (approx. 2.35m at its lowest point) and is subject to vandalism due to its poor construction and low height. However it is considered that the tunnel is an essential cycle route if a practical north-south link is to be established in accordance with policy. RBC Transport have established that the existing suspended ceiling and various services housed within it would require removal and re-configuration, as well as the protection of exposed services. This would increase headroom at lowest sections to approx. 2.6m which is close to the desired minimum headroom of 2.7m for cyclists and would allow Highways to support a change to the current restriction on cycling and provide a dedicated route through. The detailed design and subsequent Traffic Regulation Order would be a matter for the Highways Authority. The Council has undertaken a scoping study for the works and based on this the

Highways Authority advise that a contribution of £200,000 would be required to secure the works. The applicant has agreed to this being secured within the S106, payable prior to commencement of Phase 2 development.

- 6.223 It is considered that the submitted cycling provision design is acceptable in general layout terms. It will require further refinement under a s.278 agreement and associated Traffic Regulation Orders through the Highways Authority/Highways Acts/. It is recommended that the design should be secured through the S106 legal agreement including a requirement to enter into a s.278 agreement and TRO to allow the works to proceed. This should also include more detail on signage, road markings, lighting and technical details relating to kerbs, surfaces etc. It is essential that the S106 agreement secures provision of all cycle improvements concurrent with the implementation of Phase 2 (prior to first occupation of Plot G office, or timetable to be agreed linked to Phase 2 implementation) as the route through the centre of the scheme only offers limited cycling opportunities and does not provide the north-south link required under policy.
- 6.224 The detailed comments of the Highways Authority on all other matters, including servicing, vehicle and cycle parking, access, waste storage, electric vehicle charging, public transport, taxis, construction management etc, are set out in the consultation section above and officers agree with this assessment.
- 6.225 Overall the Transport and movement aspects of the current proposals are considered to be in accordance with Policies CR2, CR11, TR1, TR2, TR3 and TR4 and TR5 and the policy guidance contained within the Reading Station Area Framework, subject to compliance with the recommended conditions and S106 obligations.

viii) Ecology

- 6.226 The submitted Ecological Assessments within the ES. This recommends: *"The use of native species or species of benefit to wildlife within any proposed landscape scheme to provide foraging opportunities for birds, bats, invertebrates and other fauna is recommended to enhance the Site for wildlife"* The assessment also recommends retaining existing trees where possible. In this instance it is considered that existing trees were planted as landscaping for previous schemes and their specific layouts and are incompatible with the regeneration/redevelopment of the site. This places particular importance on the number and choice of new trees in terms of their ecological potential. Officers have therefore focused on securing additional trees and native species as part of revisions to the landscaping proposals.
- 6.227 The submitted ecological assessment recommends *"The provision of a variety of habitats to provide floristic diversity e.g lawns, hedgerows, shrub planting and herbaceous planting"*. This is largely provided for on the 'Pocket Park' embankment but also within the proposed raised planters throughout the scheme. This is another supporting reason for providing the Pocket Park within Phase 2.
- 6.228 The submitted assessment continues *"Additional habitat could be created above ground level utilising roof top space to provide suitable foraging opportunities for local fauna such as bats, bird and invertebrates. Brown roofs should be provided with a gravel substrate and allowed to self-seed with ruderal/ephemeral species. Green roofs could also be provided by creating grassland on roofs by sowing sedum*

*and hardy plant species in shallow low-nutrient soils. Such habitats would provide a food source for invertebrates on which birds and bats may feed. They are also ideal for incorporating bat/bird boxes".* Officers note that the extant permissions secured at least 25% of the roof area for this purpose and a similar condition is recommended for Phase 3. The extent of green/brown roof is shown on the detailed drawings for Phase 2 and a condition securing this, including full specifications to be submitted is recommended.

- 6.229 The submitted ecological assessment recommends, (in line with Extant Planning Condition 22 (190441/2)), that future scheme designs provide artificial nesting opportunities (e.g. Schwegler 2HW Nest Box) for black redstarts. It is recommended that the nest boxes are erected at least 4m above ground level on buildings facing a north-east or east direction. The nest box should be located away from areas of disturbance and ideally close to potential foraging resources (e.g. brown roofs).
- 6.230 The applicant's assessment also states that artificial nesting opportunities for peregrine falcons should be provided within the Development on buildings of suitable height, taking the former Western Tower as a benchmark at c.15 storeys.
- 6.231 The submitted bat survey identifies no impact on bats but recommends provision of bat boxes to be integrated in the new development and conditions are recommended accordingly.
- 6.232 Conditions are recommended to secure the ecological mitigation and enhancement, similar to Conditions 22, 30, 31 and 35 of the extant permissions 190441/190442.
- 6.233 The Council's Ecologist advises that "This development is unlikely to have any adverse impact on protected species and there should be no ecological constraints to the proposals. As such there are no objections to this application on ecological grounds..." (subject to conditions).
- 6.234 The applications are considered to comply with Policy EN12 (Biodiversity and The Green Network) on this basis.

#### ix) Wind and Microclimate

- 6.235 BRE have been commissioned by the Council to appraise the wind and microclimate characteristics of the proposal.
- 6.266 The Technical Appendix 13.2 (ES Vol 3) contains the "Interim Development Scenario", which the applicant describes as "*Phase 2 in the event that Phase 3 is not constructed concurrently*". The wind microclimate information that relates to the Phase 2 scheme, and the Interim Development Scenario is given in the following places in the Technical Appendix:
  - *Phase 2 with Existing Surrounds* Configuration 2: Interim Development Scenario with the Existing Surrounding Buildings and Dot plots in figures 6-8 (pages 29 - 31)
  - *Interim Development Scenario (i.e. Phase 2 with Mitigation measures)*
  - Mitigation: Interim Development Scenario with Landscaping, Wind Mitigation and the Existing Surrounding Buildings and Dot plots in figures 15-17 (pages 38-40).
- 6.267 BRE confirm that they have reviewed the above information and conclude that, provided the mitigation measures described by the applicant are implemented fully

(i.e. the Interim Development Scenario), then BRE agree with the applicant that the Phase 2 ground level wind conditions at all of the on-site and off-site test locations then become suitable for their intended pedestrian activities and provided the proposed mitigation measures are implemented in full, then on wind microclimate grounds BRE find no reason for refusing the approval of the full planning application of the Phase 2 scheme.

- 6.267 BRE advise that they do not foresee any 'Show Stoppers' for Phase 3 but that further testing of the final design will be required at Reserved Matters stage "*The evidence suggests that reducing the height of the Plot A building is likely to improve the general wind conditions around the Phase 3 site. Additional planting, careful choice of entrance locations, increasing balcony balustrade heights, and providing higher level perimeter glazing around the roof terraces are all options...*".
- 6.268 A condition is recommended securing further wind-tunnel testing and modelling to inform assessment and wind mitigation within any future Reserved Matters proposals.
- 6.269 BRE findings confirm that the proposals would result in an acceptable wind and microclimate environment around Plot G, subject to tree planting being provided as shown in the ES to provide mitigation until such time as the development of Phase 3 comes forward. Phase 3 will require additional wind modelling once the design of the plots and the phasing is known. Conditions are recommended to secure the mitigation and further modelling.
- 6.270 The proposals are considered to comply with Policies CR10 which requires tall buildings proposals to "*Mitigate any wind speed or turbulence or overshadowing effects through design and siting*".

x) **Environmental Sustainability**

***Carbon Emissions***

- 6.271 Station Hill is a key regeneration site in the Borough and certainly one of the most prominent. It is considered that it should set a standard for other regeneration schemes and should demonstrate exemplary sustainability compliance.
- 6.272 Policy CC2 (Sustainable Design and Construction) requires that the design of buildings and site layouts to use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change. It is shown as an allocated site for decentralised energy in the Sustainable Design and Construction SPD 2019.
- 6.273 All major non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM 'Excellent' standards, where possible. The application indicates this will be achieved. A condition is recommended to secure this.
- 6.274 In respect of the residential element that could come forward under Phase 3, Policy CC2 requires major residential developments to achieve 'Zero Carbon' and that in doing so, the preference is to achieve true carbon neutral development on-site. If

this is not achievable, it must achieve a minimum of 35% improvement in regulated emissions over the Target Emissions Rate in the 2013 Building Regulations, plus a Section 106 contribution of £1,800 per remaining tonne towards carbon offsetting within the Borough (calculated as £60/tonne over a 30 year period). Contributions will be ring-fenced for projects which deliver a carbon saving in Reading. The uncertainty over the design of Phase 3 makes detailed energy assessment difficult. It is therefore recommended that the zero carbon standard, or equivalent offset contribution as per the SPD formula should be secured through the S106 legal agreement (the SPD confirms that a S106 planning obligation is the correct method to secure this).

- 6.275 Policy CC2 also requires that all non-residential development or conversions to residential should incorporate water conservation measures so that predicted per capita consumption does not exceed the appropriate levels set out in the applicable BREEAM standard. Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective. A condition securing this is recommended.
- 6.276 Policy CC4 states that *"In meeting the sustainability requirements of this plan, developments of the sizes set out below shall demonstrate how consideration has been given to securing energy for the development from a decentralised energy source. Any development of more than 20 dwellings and/ or non-residential development of over 1,000 sq m shall consider the inclusion of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision."*
- 6.277 The supporting text to this policy at para 4.1.15 explains that *" air-source or ground-source heat pumps should be considered in the first instance, as these methods are less carbon intensive than [fossil-fuel powered] Combined Heat and Power"*.
- 6.278 The Sustainable Design and Construction SPD 2019 explains in para. 8.5 that *"the preference for air-source and ground-source heat pumps over CHP is set out in the Local Plan, but in general GSHPs should be investigated as a priority over ASHPs. This is because they enable greater seasonal efficiencies."*
- 6.279 A sequential approach to selection of GSHP vs ASHP is set out in para 8.6 of the SPD: *" Evidence should be provided at the detailed planning application stage where GSHP systems are discounted, and ASHP systems selected, with the following technical analyses:*
- *Calculated system seasonal efficiency comparison;*
  - *Evidence of any constraints on boreholes related to existing utilities or other sub-surface infrastructure;*
  - *Borehole spatial constraints; and*
  - *Any other technical reasons why GSHP cannot be progressed and ASHP must be taken forward as the primary heat technology."*
- 6.280 Policy CR10(v) requires Tall Buildings to "Maximise the levels of energy efficiency in order to offset the generally energy intensive nature of such buildings..."

The Applicant's strategy for Phase 2 consists of Air Source Heat pumps mounted at roof level of the building on Plot G. The strategy has been assessed by Element Energy on behalf of the Council, reporting to the Council's Sustainability Manager.

- 6.281 The proposed ASHPs can operate in single heating/cooling mode or simultaneous heating/cooling mode, the latter providing more efficient supply of thermal energy to the building. The minimum Seasonal Coefficient of Performance (sCOP) is ~3.4 in single mode, up to a maximum of ~6 in simultaneous mode. Therefore the actual sCOP of the system (heating and cooling) is somewhere between these two figures, dependent on the number of annual hours the system spends in simultaneous mode. Advice received is that this is relatively high-performance for an ASHP system, which is aided by the low temperatures of the proposed low temperature hot water (LTHW) network in the building. However it is unlikely to outperform Ground-Source technologies which the Sustainable Design and Construction SPD explains generally offer better seasonal efficiencies.
- 6.282 The Applicant has not submitted any specific evidence that compares seasonal efficiencies of the ASHP system to GSHPs, as is required in para 8.6 of the SPD. In addition evidence from the Applicant is not clear regarding the final seasonal efficiency of the ASHP system. A range of potential efficiencies has been provided (i.e. sCOP of 3.4-6.0), however no final figure has been provided. A number of Applicant responses to requests for clarification on the expected system efficiency has not provided confidence in the assertion that the proposed approach will deliver an efficient system relative to conventional (i.e. non-simultaneous capability) ASHP system design. Calculated seasonal efficiency of the ASHP system would need to be provided alongside the equivalent GSHP system to provide the required certainty. As things stand, it must be assumed that GSHP remains the more efficient, probably by a significant margin and therefore the Phase 2 proposals do not fully comply with policy requirements. This failing therefore needs to be weighed against the benefits of the overall energy strategy and against the wider benefits of the proposed development within the overall Planning balance.
- 6.283 The evidence provided to date by the Applicant regarding open-loop GSHP is not deemed sufficient to discount the technology. It has been stated that the available groundwater for abstraction is limited to ~4 litre per second, which was estimated to provide 10% of the peak heat demand for Station Hill. No estimation has been provided that demonstrates the annual heat demand that could be met by an open-loop borehole with this abstraction rate. It has been highlighted to the Applicant that boreholes within close proximity of the Station Hill site are achieving significantly higher abstraction rates. Further investigation is therefore required before the open-loop borehole GSHP option can be discounted as a heat supply option for Phase 2.
- 6.284 The Applicant has suggested that there is little space for closed-loop GSHP boreholes within Phase 2. This may be the case due to the existing podium and car park piles which would remain in the ground. However the Phase 3 land would appear to be available (it is mostly a vacant plot currently) and this has not been properly scoped out.

- 6.285 The Phase 3 development of Station Hill has potential to include the more efficient GSHP technology. A heat network link between phases 2 and 3 is proposed in the design to allow thermal energy sharing and this link has potential to allow better balancing of ground temperatures across the site (summer cooling of Phase 2 glazed office and winter heating of Phase 3 residential-dominated development, using boreholes for seasonal storage). Infrastructure to allow connection into the proposed Reading-wide district heating network is also provided for through the proposed design, which is a requirement of Policy CC4 and according to the SPD could include *"Station Hill and around - centred on seven plots of the large Station Hill redevelopment site and includes three other planned redevelopments at Sainsbury's, Garrard House and Weldale Street"*. The SPD acknowledges that provision of a district heating scheme is beyond the scope of a single development but requires space for plant and pipework to be provided within the development and *"buried and capped-off DH pipework from the development's plant room to a convenient location (to be agreed with RBC) in preparation for connection to the DH network"*. (SPD para 8.10).
- 6.286 It is considered that the proposed energy strategy goes some way to complying with Policy CC4 and the Sustainable Design and Construction SPD, however further evidence is required before this can be confirmed. Policy CC4 is to be interpreted through the policy guidance and clarifications contained within the SPD which gives a clear sequential approach in favour of GSHP. The proposals are therefore somewhere in the middle-ground as they fall short of the ideal fully GSHP-powered system on Phase 2 but do provide decentralised ASHP system. It is recommended that the S106 legal agreement should secure full details of space heating, water heating and cooling systems for both phases in accordance with the submitted Energy Strategy. Full details are to be submitted for approval prior to construction works commencing for either phase, including details of their thermal performance, connection arrangements to all other phases and timetable for their provision. The details should include provision for connection to District Heating network(s) beyond the site boundary, including capped-off pipework and space in plant rooms, and commitments to make reasonable endeavours to connect when a nearby DH network becomes available. The Energy Strategy leaves the door open for the possibility of GSHP within Phase 3 but does not commit to this, despite this approach being likely to be a feasible option. It is recommended that the S106 agreement includes a requirement for GSHP on Phase 3 unless detailed feasibility demonstrates otherwise, with ASHP being the fall-back alternative. The S106 should require sharing of excess heat/cooling between phases and ultimately beyond the site boundary once systems come online. Securing this through the S106 is in accordance with page 8 of the S106 Planning Obligations SPD 2015.
- 6.287 It is considered that this approach would comply with Policy CC2 subject to the recommended conditions and planning obligations in respect of BREEAM zero carbon and water use. The overall approach to energy and heating does not fully comply with Policy CC4 or the Sustainable Design and Construction SPD as explained above although it would secure a decentralised heat network between phases and allow for future connections with nearby sites. The main failing is the degree to which potential for carbon dioxide emissions is fully realised due to the choice of sub-optimal heating technology within Phase 2.



### *Surface Water Drainage and Flood Risk*

- 6.288 The site is required under national and local Planning policy to provide a sustainable urban drainage system to deal with surface water and ensure that the rate and amount of surface water discharge suitably managed. The Applicant has submitted a SUDS strategy (contained within the ES) which proposes
- 6.289 Phase 2 Drainage Report and SuDS Strategy Report Reference SHR-RAM-XX-RP-C-000004 dated 16 December 2019 sets out some detail. It is proposed that the surface water run-off from Plot G Phase 2 roof areas is drained via a number of rainwater down pipes and combined internally before entering the below ground attenuation tank in the building, lower ground level. The surface water run-off from the podium is captured within a storage layer located on the ground floor podium slab. This storage layer (Permavoid or equivalent) is a pre-formed polycarbonate crate system providing circa 90% free volume. The discharge points from the Permavoid will be set to provide the agreed discharge rate, and are discharged via a private drainage network which connects to the public sewers located in Garrard street and Station Hill.
- 6.290 The surface water run-off from the roof areas of Plots A/B and D is proposed to be drained into a Green/Blue roof permavoid system. It is proposed that surface water run off from Building A/B is discharged into existing sewers within Station Hill and the surface water run off from Building D is discharged into existing sewers in Garrard street at the discharge rates mentioned above.
- 6.291 Surface water run off from the ground floor podium (public realm) and commercial Building C will be drained into the permavoid located within the podium level. Due to restricted space and depth for the permavoid at podium an additional volume of approx. 100 cubic metres will be required to attenuate the surface water from the podium and Building C. It is proposed that this additional storage will be in the form of below ground attenuation tanks located in basement level - 03 and pumped to the public sewer in Station Hill. Flow control measures will be incorporated within permavoid to achieve the required restricted discharge rate.
- 6.292 The precise outfall locations and connection details, where and if new outfalls are required, will be agreed with Thames Water as part of the detailed design stages as necessary. A surface water drainage network has been developed for the proposed site, refer to the surface water drainage layout plan in Appendix 3.
- 6.293 The design is necessarily general in respect of Phase 3 at this stage given the uncertainties over scale, layout and landscaping.
- 6.294 The Lead Flood Authority advise that full details of the scheme for all phases and its future maintenance will be required and are therefore recommended to be secured by condition. It is acknowledged that this may result in duplication of some detail already submitted but the complexity and lack of a complete design at this stage justify a complete and clearly defined design package to be secured by condition prior to construction commencing (but allowing for demolition).
- 6.295 Whilst the underground attenuation tank approach is acceptable purely in terms of flow rates and discharge amounts, its environmental credentials are relatively low compared with the benefits of a more 'natural' system. This places increased reliance on additional measures, including green roofs, tree planting and other

soft-landscaped area to be secured elsewhere by condition. Policy EN18 states *"Wherever possible, SuDS provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology. All new developments in areas of flood risk should give priority to SuDS"*. The proposed landscaping condition therefore requires SUDS to be integrated within the planting and hard landscaping scheme where possible. It is considered that this is a reasonable approach given the dense, urban, character of the proposals and would comply with the general aims of Policy EN18 in this context.

xi) **Air Quality**

6.296 The proposals involve a large increase in development floorspace and associated activity within the Air Quality Management Area (AQMA). This could include up to 750 dwellings. An assessment of the suitability of proposed mitigation both in terms of protecting future residents (ventilation, etc.) and mitigation of the wider impacts on the surrounding area needs to be provided. The existing assessment is not accepted for the reasons set out in the Environmental Protection consultation response (see consultation section above). It is considered that most of the impacts (most of the car parking, most of the residential and most of the floor area) are located in Phase 3. There is a good deal of flexibility remaining in terms of the layout and landscaping, which can be used to mitigate the effects of poor air quality. These matters are recommended to be addressed by condition.

6.297 It is noted that a large number of car parking spaces are proposed to be re-provided. Policy EN15 states that development should have regard to the need to improve air quality. It is considered that parking would be most appropriate to serve the specific uses within the development rather than being opened up to wider public use. However the representations in respect of loss of parking for neighbouring uses are noted and it is considered reasonable to allow a managed approach which may include access for users other than occupiers of the building, taking into account potential air quality, traffic generation and security concerns. A condition securing a management strategy is recommended.

6.298 It is considered that, subject to these conditions, the proposals would comply with Policies EN15 and CR6 in respect of Air Quality.

xii) **Contaminated Land**

6.299 The Contaminated Land conditions are recommended as per EP advice and similar to those of the extant permissions for each phase. Further investigation, remediation and final verification are required. The proposals are in accordance with Policy EN16 on this basis. The impacts of SuDS Contamination will be considered separately as part of the

xiii) **Security**

6.300 Policy CC7 requires development to *"Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion"*.

6.301 The site includes large areas of public realm and areas of undercroft beneath the podium, which Thames Valley Police and the Council's Emergency Planner advise must be appropriately secured from unauthorised entry. Conditions are recommended, similar to that imposed on the extant permissions, to secure a security strategy, including full details of access control and additional

compartmentation where necessary. This should also include 'Hostile Vehicle Mitigation' to prevent unauthorised access to the public realm areas and appropriate blast-resistant glazing. A condition requiring proof of Secured by Design accreditation for any new dwellings provided is also recommended to ensure that the Police and LPA can be confident that the buildings offer a robust, holistic, approach to security and safety.

6.302 CCTV is considered to be an important component of the safety and security of the site and surrounding streets. Similar to the approach with Phase 1, it is recommended that a CCTV scheme should be secured through the S106 agreement, to link in with the Council and/or Thames Valley Police CCTV systems

6.303 Officers initially envisaged a Business Improvement District Wardens office, to be secured via S106 within Plot G as a replacement for the Police Office secured under the extant permissions. Thames Valley Police advised at pre-application stage that a Police Office is no longer an operational requirement. TVP are a consultee on the application and have not altered their pre-app advice. Reading UK CIC requested the BID Wardens office and noted that it would also be used as a base by the Police on an ad hoc basis. They advise "*to confirm - the BID wardens work closely with the police (specifically the town centre patrol team), this space will allow us to maintain a base for the wardens in the centre of town once the police move their HQ to south Reading - and will also provide a drop in / hot desk space for the police patrol in the centre*". The applicant refused to accept the requirement during negotiations. Officers discussed the matter further with Reading UK CIC and it was agreed that while the office may be a useful addition, it could be provided elsewhere and given the applicant's unwillingness to accommodate the facility, was not a matter that should prevent the application being recommended for approval.

xiv) Archaeology

6.304 The application is accompanied by an ES (December 2019), which is 'a full update of all previous ESs' (Paragraph 1.17). Chapter 9 addresses the historic environment, including archaeology, and has been updated to reflect recent archaeological work south of the application area, in Plots E and F.

6.305 The document provides for archaeological investigations post demolition and pre construction within the application area (Paragraph 6.13. and 9.62). Berkshire Archaeology advise that this is consistent with previous proposals for the wider Station Hill development as set out in the previously approved 'Overarching Archaeological Written Scheme of Investigation' (OAWSI) prepared by Waterman in relation to applications 130436, 151426 and 151427. The programme of archaeological work will normally commence with an exploratory field evaluation which will establish if and what further archaeological mitigation measures are required.

6.306 On this basis, Berkshire Archaeology recommends that appropriate conditions are applied that reflect the previously agreed approach to mitigating the archaeological impacts of the Station Hill development. Berkshire Archaeology

recommend conditions to require development to be carried out in accordance with the submitted 'Overarching Archaeological Written Scheme of Investigation (Waterman, October 2019) and to secure additional detailed Written Scheme of Investigation(s) specific to each plot based on the overarching WSI. The proposals are considered to be in accordance with Policies EN1 and EN2 on this basis.

xv) **Public Toilets**

- 6.307 The size and location of the scheme justifies the designing-in of publicly accessible toilets to serve future users of the site and this is considered to be a component of good design as required by Policy CC7. The proposed S106 Agreement would secure a scheme for publicly-accessible toilets, (either public toilets, or suitable public access to commercial toilets), within Phase 3 land is to be submitted for approval prior to first occupation of any Plot, as set out in the recommendation above.

xvi) **Observatory**

- 6.308 Policy CR10 requires tall buildings to "*Provide managed public access to an upper floor observatory and to ground floors where appropriate, and ensure that arrangements for access within the building are incorporated in the design stage*". This has been the subject of detailed discussions with the applicant due to their concern that this could affect the attractiveness of the scheme to commercial tenants. Limited access for 35 days a year for business and community groups has been agreed, as set out in the recommendation at the head of this report. This is considered to be a reasonable approach to complying with the policy.

xvii) **Building Maintenance Arrangements**

- 6.309 The application indicates that upper floors of Plot G will be cleaned via a building maintenance unit (BMUs). The drawings show this protruding above the top of the proposed plant enclosure. This is Policy CR10(v) requires tall buildings to "*Incorporate appropriate maintenance arrangements at the design stage*". The protruding design is not ideal in terms of the building silhouette, especially in longer range views. However the visual harm would not be sufficient on its own to warrant refusal of the application.

xviii) **Solar Glare**

- 6.310 Glazed facades can reflect and concentrate sunlight causing glare. This could be harmful to surrounding land uses and a particular hazard for train drivers on the adjacent railway. The applicant has submitted a solar glare assessment as part of the Environmental Statement.
- 6.311 This does not identify harmful glare either in the Interim Scenario (Phase 2 built, Phase 3 not built) or the Completed Development Scenario (Phases 2 and 3) are all identified as "Minor adverse i.e. Solar reflections are visible within 30° to 10° or between 10° to 5° of the [train] driver's line of sight for a short period of time."
- 6.312 The methodology has been checked and agreed by the Council's third party advisors on Daylight and Sunlight matters. The proposals are considered to comply with Policy CR10 (Tall Buildings) on this basis. Further assessment will be required for Phase 3

at Reserved Matters stage one the final Layout, Scale and Appearance are confirmed. A condition is recommended to secure this.

xix) **Broadcast Signal Interference**

- 6.313 Tall and bulky buildings can interrupt TV, radio and other similar signals. The submitted Television and Radio Signal Survey & Television and Radio Reception Impact Assessment report concludes that:

*"Digital Terrestrial Television (DTT) - Freeview*

*Due to existing good coverage and lack of viewers in any theoretical signal shadow area, the proposed development is not expected to have any adverse effect upon the reception of Freeview television services.*

*Digital Satellite Television - Freesat & Sky*

*The proposed development could cause disruption to the reception of digital satellite television services within 251m to the north-northwest from the base of the tallest proposed building [approximately this appears to include the development sites north of the railway, Northfields Road, Barry Place and Swansea Road]. As there are satellite dishes located on buildings in this area interference could occur. Should interference occur, a simple and cost-effective mitigation solution is to relocate the satellite dish to a new location where the view to the serving satellite is not obscured by the obstruction. Once the satellite dish has been moved to a new location, interference would cease.*

*VHF(FM) Radio*

*Due to the existing good coverage and robust technical nature of the broadcast radio network with respect to building-generated signal interference, the proposed development is not expected to affect the reception of VHF(FM) radio services.*

*Overall, the proposed development may cause minor short-term interference to digital satellite television reception to localised areas to the immediate north-northwest of the site. Mitigation solutions exist that will quickly restore the reception of affected television services, leaving no long-term adverse effects for any viewer."*

- 6.314 It is noted that the impact is largely limited to satellite television signals and that mitigation options exist, although a worst-case assessment would be that relocation of the dish is not possible in which case presumably satellite reception would be lost or adversely affected. On balance it is considered that the impact on relatively few properties, for one type of broadcast signal and with alternatives including terrestrial digital tv and cable tv available, taken together with the development plan policy support for tall buildings in this location and the regeneration and socioeconomic benefits of the scheme outweigh any harm arising from interference with satellite tv signals.

xx) **Broadband Internet**

- 6.315 The submitted Superfast Broadband Strategy dated December 2019 sets out the steps that are necessary to enable a second telecoms provider infrastructure to be installed to all premises, including fibre ducts rising through the building. It is recommended that the strategy be secured by condition in accordance with national policy support for improved telecoms infrastructure, for instance para. 112 of the

NPPF “Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections”.

xxi) Phasing

6.316 Phase 2 comprising the Plot G office building and associated public realm are considered to be a single phase and the two are interdependent. The applicant has suggested that areas around the Pocket Park and SW Interchange might come forward later. Officers are clear that provision of the office without the link bridge, ‘Central Plaza’, ‘Pocket Park’, SW Interchange and Station Square improvements would fail to provide appropriate routes and spaces around the building, fail to provide an appropriate landscaped setting for the scale of building proposed and fundamentally fail to provide the north-south route through the site at an appropriate stage of development (as referred to elsewhere in this report). The applicant has placed a great deal of emphasis on the benefits of the public realm in their submission and these contribute to the overall Planning balance. It is recommended that provision of Phase 2 public realm concurrent with the Phase 2 office building should be secured by condition.

6.317 The applicant has also suggested that the Council should pay half the cost of providing the Pocket Park on the basis that it extends onto highway land controlled by the Council. Officers have made it clear that (i) the encroachment onto Council land is a direct result of the proposed extent of the podium (ii) the Pocket Park is a fundamental part of the design (see above) and (iii) the Council’s role in investing in, or funding, a development is not a planning matter and should not affect the determination of the application.

6.318 Some greater flexibility of phasing for Phase 3 would appear reasonable due to the different plots, the potential for changes to their positions and the different uses requiring different outdoor spaces. The recommended phasing condition accommodates this for Phase 3. This approach to phasing is considered to be in accordance with Policies CC7, EN9, EN14, TR4, CR2, CR3, CR10, CR11 and RSAF.

xxii) S106 Matters

6.319 The extant SH3 S106 agreements (130436, 151426, 151427) were used as the starting point for the S106 obligations for the recent permissions on the South Site (190441, 190442) on the basis that those s.73 permissions vary the permissions that went before them. Reference has been made to the extant S106 for the current North Site proposals, but it is important to note that the proposals are new and very different from the extant permission. They are also within a new policy context following adoption of the Local Plan 2019 and this changes the S106 requirements in many areas. For instance, the Employment-Related Affordable Housing Contribution is no longer a policy requirement (the Local Plan Inspector removed this at Examination stage). The sum of £1,515,000 is secured under the extant permission. Also open space contributions are less relevant due to the increased area of public realm (it is therefore important that the public realm is brought forward at an early stage in the development).

6.320 Contributions are referred to at relevant sections of this report and are not repeated here. It is considered that all the contributions meet the relevant tests in the CIL Regulations being necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and

kind to the development. All contributions have been calculated against the impacts of the current proposals and should be index-linked from the date of permission to retain their value over time.

**xxiii) Equality**

- 6.321 In determining this application, the LPA is required to have regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, sex, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation. There is no indication or evidence (including from consultation on the application) that the protected groups have or will have different needs, experiences, issues and priorities in relation to the particular planning application. Matters relating to accessibility between the level changes across the site are addressed elsewhere in this report. In terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

**xxiv) Conclusion and Planning Balance**

- 6.322 The Station Hill site occupies a key strategic location in the town centre. Its current dilapidated condition is clearly harmful to the vitality of the town centre and fails to make effective use of the site. The regeneration of this site is therefore understandably a focus of Development Plan policy for the Borough. Previously permitted schemes have not been realised and only a limited development (generally restricted to demolition) has been undertaken on the site to date.
- 6.323 The proposed high-density scheme, dominated by office uses but nevertheless including a mix of retail, leisure, possibly hotel and possibly residential uses (which are likely to be provided in all or in part due to the high property values they attract), will serve to regenerate the site. It is considered that the regeneration benefits of the proposal would be considerable as described in this report (especially in socioeconomic terms), and that these benefits should be afforded substantial weight when considering the current proposals.
- 6.324 However, this report also makes reference to a number of negative aspects of the scheme. It is recognised that a balanced approach is required when determining planning applications and that partial compliance with development plan policy can be acceptable where other material considerations indicate a different approach.
- 6.325 Affordable Housing is a key issue within the Borough. The failure to provide sufficient Affordable Housing would result in substantial harm in terms of meeting identified Housing Need and achieving mixed and balanced communities.
- 6.326 The offer stands at 10% of the dwellings on site with a tenure mix that reflects that set out in the emerging Affordable Housing SPD and with the remaining 20% captured within a deferred payments mechanism, should profitability increase. It is noted that the applicant's viability assessment is not agreed, although all parties agree that the scheme is unviable as designed. It is Officers' view that the reasons for the unviability do not justify a reduction in Affordable Housing for the reasons set out elsewhere in this report (para 6.153) and this unjustified shortfall is therefore a harmful element within the proposal.

- 6.327 Some weight must be given to the fact that the Affordable Housing offer goes part-way to meeting policy requirements and associated housing need. It is considered that the harm resulting from the failure to fully meet the critical need for Affordable Housing is marginally outweighed by the benefits of the scheme which are themselves also substantial, as described above.
- 6.328 The report also identifies harm in respect of the height and massing of buildings within Phase 3, the failure to avoid overly dense townscape and harm to the setting of heritage assets, even with controls imposed through the recommended conditions, Parameter Plans and the Design Codes. However It is considered that the regeneration benefits of the scheme would sufficiently outweigh this harm.
- 6.329 Decentralised Energy provision is identified in the report as being 'sub optimal' due to the choice of Air Source heat pump technology over the more efficient Ground Source Heat pumps within Phase 2. However it is considered that sufficient mitigation in the form of a site-wide heat network and further exploration of Ground Source feasibility for Phase 3 secured by S106 and any residual harm in environmental sustainability terms is outweighed by the wider benefits of the scheme.
- 6.330 Officers have taken a proactive approach and are satisfied that the proposed requirements are reasonable and necessary and in the absence of clear viability justification to the contrary the S106 Heads of Terms are presented to Committee for a decision on that basis. Failure to sign the S106 in a timely manner would result in this forming a reason for refusal, as is standard practice.
- 6.331 The considerable regeneration benefits of the scheme are noted. It is also considered that these are fully required in order to outweigh the significant amount of harm identified in respect of failure to fully meet the critical need for Affordable Housing and the associated harm in respect of achieving mixed and balanced communities. The harm arising from the proposed parameters which would result in an overly dense townscape and harm to the setting of heritage assets also weighs against the proposal. The weighing in favour of the proposal is therefore marginal. The proposals are recommended for approval on this basis and as set out in the recommendation at the top of this report.

Case Officer: Steve Vigar



## **APPENDIX 1 SUBMITTED DETAILS**

### **PHASE 2 DRAWINGS - 192032/HYB**

SHRN - CRL - SW - ZZ - PL - A- 0105 - Rev P00 Site Location Plan dated 13 December 2020

SHRN - CRL - SW - ZZ - PL- A - 0115 Rev P01 Phasing Plan dated 15 May 2020

SHRN - CRL - SW - ZZ - PL - A- 1051 Rev P00 Demolition Plan dated 13 December 2019

SHRN - CRL - S2 - P2 - PL - A - 1208 Rev P01 Proposed Plan Level -2 dated 22 May 2020

SHRN - CRL - S2 - P1 - PL - A - 1209 Rev P01 Proposed Plan Level -1 dated 22 May 2020

SHRN - CRL - S2 - 00 - PL - A - 1210 Rev P01 Proposed Plan Level 00 dated 22 May 2020

SHRN - CRL - S2 - RF - PL - A - 1249 Rev P01 Proposed Plan Level Roof dated 22 May 2020

SHRN - CRL - S2 - P2 - PL - A - 1308 Rev P01 Proposed Plan Level -2 dated 22 May 2020

SHRN - CRL - S2 - P1 - PL - A - 1309 Rev P01 Proposed Plan Level -1 dated 22 May 2020

SHRN - CRL - S2 - 00 - PL - A - 1310 Rev P01 Proposed Plan Level 00 dated 22 May 2020

SHRN - CRL - S2 - ZZ - PL - A - 3105 Rev P01 Proposed Section A dated 22 May 2020

SHRN - GEN - BG - P2 - PL - A - 1108 P01 One Station Hill Plan Podium Level -2/LG dated 22 May 2020

SHRN - GEN -- P1 - PL - A - 1109 P01 One Station Hill Plan Podium Level -1/LG Mezz dated 30 October 2019

SHRN - - 00 - PL - A- 1110 P01 One Station Hill Plan - Level Ground dated 22 May 2020

SHRN - GEN - BG - 01 - PL - A- 1111 P01 One Station Hill Plan - Level 01 dated 22 May 2020

SHRN - GEN - BG - 02 - PL - A- 1112 P01 One Station Hill Plan - Level 02 dated 22 May 2020

SHRN - GEN - BG - 03 - PL - A- 1113 P01 One Station Hill Plan - Level 03-07 dated 22 May 2020

SHRN - GEN - BG - 08 - PL - A- 1118 P01 One Station Hill Plan - Level 08 dated 22 May 2020

SHRN - GEN - BG - 09 - PL - A- 1119 P01 One Station Hill Plan - Level 09 dated 22 May 2020

SHRN - GEN - BG - 10 - PL - A- 1120 P01 One Station Hill Plan - Level 10 dated 22 May 2020

SHRN - GEN - BG - 11 - PL - A- 1121 P01 One Station Hill Plan - Level 11-14 dated 22 May 2020

SHRN - GEN - BG - 15 - PL - A- 1125 P01 One Station Hill Plan - Level 15 dated 22 May 2020

SHRN - GEN - BG - 16 - PL - A- 1126 P01 One Station Hill Plan - Level 16 dated 22 May 2020

SHRN - GEN - BG - 17 - PL - A- 1127 P01 One Station Hill Plan - Level 16 Mezzanine dated 22 May 2020

SHRN - GEN - BG - RF - PL - A- 1128 P00 One Station Hill Plan - Level Roof dated 22 May 2020

SHRN - GEN - BG - ZZ - PL - A- 1300 P01 One Station Hill - Elevation North dated 22 May 2020

SHRN - GEN - BG - ZZ - PL - A- 1301 P01 One Station Hill - Elevation West dated 22 May 2020

SHRN - GEN - BG - ZZ - PL - A- 1302 P01 One Station Hill- Elevation South dated 22 May 2020

SHRN - GEN - BG - ZZ - PL - A- 1303 P01 One Station Hill- Elevation East dated 22 May 2020

SHRN - GEN - BG - ZZ - PL - A- 1400 P01 One Station Hill- Section A-A dated 22 May 2020

SHRN - GEN - BG - ZZ - PL - A- 1401 P01 One Station Hill- Section B-B dated 22 May 2020

SHRN-CRL-S2-P2-DR-SK-9212 - Charging Station Coordination Station Hill Level dated 2 April 2020

SHRN-CRL-S2-P2-DR-SK-9212 - Charging Station Coordination Garrard St Level dated 2 April 2020

### *Landscape*

\_SHRN-LDA-S2-ZZ-PL-L-100-101 Rev T03 General Arrangement Plan dated 22 September 2020

SHRN-LDA-S2-ZZ-PL-L-100-150 P01 Wildlife Installation Plan dated 22 May 2020

SHRN - LDA- S2 - ZZ- PL- L-400-101 P01 Phase 2 - Section A dated 22 May 2020

SHRN - LDA- S2 - ZZ- PL- L-400-102 P01 Phase 2- Site Section B dated 22 May 2020

SHRN - LDA- S2 - ZZ- PL- L-400-103 P01 Phase 2 - Site Section C dated 22 May 2020

SHRN - LDA- S2 - ZZ- PL- L-400-104 P01 Phase 2 - Site Section D dated 22 May 2020

SHRN -LOA-S2-ZZ-PL-L-400-105 P01 Phase 2 - Site Section E dated 22 May 2020

SHRN -LOA-S2-ZZ-PL-L-400-106 P01 Phase 2 Site Sections F-H dated 22 May 2020

SHRN-LDA-S2-ZZ-DR-L-300-101 Rev. P01 Phase 2 detailed softworks plan sheet 1 of 7 dated 5 June 2020

SHRN-LDA-S2-ZZ-DR-L-300-102 Rev T02 Phase 2 detailed softworks plan sheet 2 of 7 dated 3 July 2020

SHRN-LDA-S2-ZZ-DR-L-300-103 Rev T02 Phase 2 detailed softworks plan sheet 3 of 7 dated 3 July 2020

SHRN-LDA-S2-ZZ-DR-L-300-104 Rev T02 Phase 2 detailed softworks plan sheet 4 of 7 dated 3 July 2020

SHRN-LDA-S2-ZZ-DR-L-300-105 Rev T02 Phase 2 detailed softworks plan sheet 5 of 7 dated 3 July 2020

SHRN-LDA-S2-ZZ-DR-L-300-106 Rev T02 Phase 2 detailed softworks plan sheet 6 of 7 dated 3 July 2020

SHRN-LDA-S2-ZZ-DR-L-300-107 Rev T02 Phase 2 detailed softworks plan sheet 7 of 7 dated 3 July 2020

SHRN-LDA-S2-ZZ-DR-L-300-108 Rev T02 Phase 2 planting schedules sheet 1 of 2 dated 3 July 2020

SHRN-LDA-S2-ZZ-DR-L-300-109 Rev T02 Phase 2 planting schedules sheet 2 of 2 dated 3 July 2020

#### *Cycleway Works Phase 2*

44470/5502/TA/01 Revision C, dated 21 September 2020

#### **PHASE 3 - DRAWINGS - 192032/HYB**

SHRN - CRL - SW - ZZ - PL - A- 0105 - Rev P00 Site Location Plan dated 13 December 2020

SHRN - CRL - SW - ZZ - PL- A - 0115 Rev P01 Phasing Plan dated 15 May 2020

SHRN - CRL - SW - ZZ - PL - A- 1051 Rev P00 Demolition Plan dated 13 December 2019

SHRN - CRL - S3 - ZZ - PL- A - 0705 Rev P03 Parameter Plans - Plots, dated 22 September 2020

SHRN - CRL - S3 - ZZ - PL- A - 0710 Rev P03 Parameter Plan Public Realm Plaza and Plaza +1 levels, dated 22 September 2020

SHRN - CRL - S3 - ZZ - PL- A - 0711 Rev P02 Parameter Plan Land Use and Minimum Distance Between Plots - Levels Plaza +2 and Above Mixed Use Scheme, dated 22 September 2020

SHRN - CRL - S3 - ZZ - PL- A - 0712 Rev P02 Parameter Plan Land Use and Minimum Distance Between Plots - Levels Plaza +2 and Above All Commercial Scheme, dated 22 September 2020

SHRN - CRL - S3 - ZZ - PL- A - 0715 Rev P03 Parameter Plan Vehicular Access and Servicing, dated 22 September 2020

SHRN - CRL - S3 - ZZ - PL- A - 0720 Rev P03 Parameter Plan Land Use Street and Podium (Plaza Level), dated 22 September 2020

SHRN - CRL - S3 - ZZ - PL- A - 0726 Rev P03 Parameter Plan Basement Parameter Section, dated 22 September 2020

### *Cycleway Works Phase 3*

44470/5502/TA/02 Revision C, dated 21 September 2020

### **DOCUMENTS - PHASES 2 and 3 -192032/HYB**

Station Hill North Design Code Hybrid Planning Application dated September 2020 received 23 September 2020

Environmental Statement Addendum, Station Hill, Reading WIE14788-100-R-34.2.1-ES Addendum, dated August 2020

Environmental Statement Addendum, Station Hill, Reading WIE14788-100-R-31.2.1-ES Addendum, dated June 2020

Addendum to the Design & Access Statement Hybrid Planning Application dated June 2020

Development Specification dated August 2020

Planning Amendment - Transport and Waste Update TN018 dated 26 May 2020

Ground Investigation Report Ramboll 1620004716 I03 dated 12 December 2019

Factual Report on Ground Investigation Report, Geotech Engineering Limited, Ref: 35248 dated 23 August 2019

Pedestrian Level Wind Microclimate Assessment RWDI #1803688 Rev E, dated 19 November 2019

Station Hill, Reading Phase 2 Drainage Strategy and Suds Report Project no. 1620004716 Version 00 date 15 July 2019

Environmental Noise Survey Rev 00 dated December 2019

Energy Strategy Rev.0 dated December 2019

Arboricultural Impact Assessment December 2019

Ventilation Strategy Statement December 2019

Site-Wide Framework Travel Plan Hybrid Planning Application

Transport Assessment Hybrid Planning Application

Television and Radio Signal Survey & Impact Assessment December 2019 Rev.02

Statement of Community Involvement December 2019

Design and Access Statement December 2019 as amended by Addendum to the Design & Access Statement June 2020

### **SOUTH SITE NMAs**

**200822**

SHR-LDA-SB-01-DR-L-110-103 P06 17 February 2020

SHR-LDA-SB-01-DR-L-320-108 P02 17 February 2020

SHR-LDA-SB-01-DR-L-320-109 P02 17 February 2020

SHR-LDA-SB-01-DR-L-500-241 P04 17 February 2020

SHR-LDA-SB-06-DR-L-110-104 P05 17 February 2020

SHR-LDA-SB-10-DR-L-110-105 P05 17 February 2020

SHR-LDA-SB-11-DR-L-110-106 P05 17 February 2020

SHR-LDA-SB-11-DR-L-320-111 P02 17 February 2020

SHR-LDA-SB-12-DR-L-110-107 P05 17 February 2020

SHR-LDA-SB-GF-DR-L-110-102 P08 17 February 2020

SHR-LDA-SB-GF-DR-L-320-104 P02 17 February 2020

SHR-LDA-SB-GF-DR-L-320-105 P03 17 February 2020

SHR-LDA-SB-GF-DR-L-320-106 P04 17 February 2020

SHR-LDA-SB-GF-DR-L-320-107 P03 17 February 2020

SHR-LDA-SB-GF-DR-L-500-231 P06 17 February 2020

SHR-LDA-SB-GF-DR-L-500-331 P05 17 February 2020

SHR-LDA-SB-GF-DR-L-500-332 P01 17 February 2020

SHR-LDA-SB-LG-DR-L-110-101 P07 17 February 2020

SHR-LDA-SB-LG-DR-L-320-101 P03 17 February 2020

SHR-LDA-SB-LG-DR-L-320-102 P03 17 February 2020

SHR-LDA-SB-LG-DR-L-320-103 P03 17 February 2020

SHR-LDA-SB-LG-DR-L-500-311 C01 9 September 2019

SHR-LDA-SB-LG-DR-L-500-312 P03 17 February 2020

SHR-LDA-SB-ZZ-DR-L-100-110 P05 17 February 2020

SHR-LDA-SB-ZZ-DR-L-400-101 CO2 January 2019

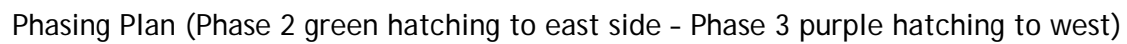
SHR-LDA-SB-ZZ-DR-L-400-102 P05 dated 17 February 2020

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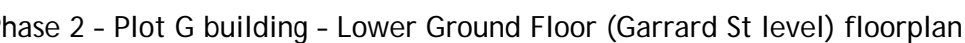
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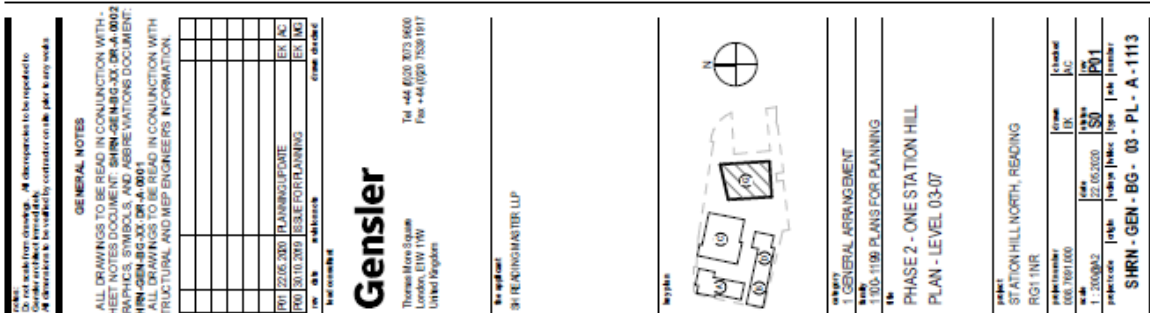
Phasing Plan (Phase 2 green hatching to east side - Phase 3 purple hatching to west)



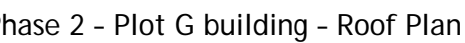








### Phase 2 - Plot G building - Levels 3 to 7 floorplan



SHRN - GEN - BG - RF - PL - A-1128

All work shall be done in accordance with the relevant Building Regulations and Approved Documents. The design shall be in accordance with the relevant Building Regulations and Approved Documents. The design shall be in accordance with the relevant Building Regulations and Approved Documents.

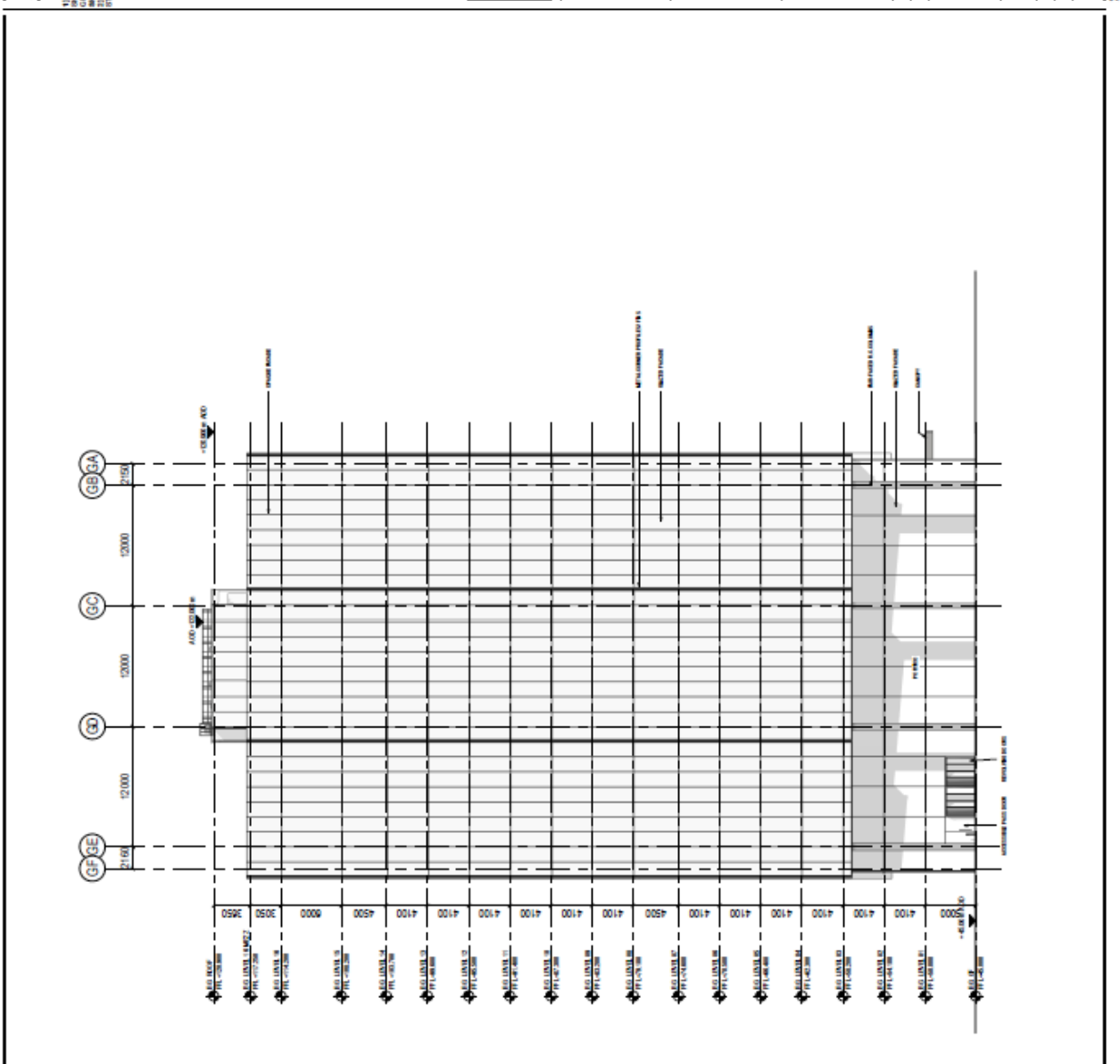
**GENERAL NOTES**  
 1. ALL DIMENSIONS ARE IN METERS UNLESS OTHERWISE STATED.  
 2. THE DESIGN SHALL BE IN ACCORDANCE WITH THE RELEVANT BUILDING REGULATIONS AND APPROVED DOCUMENTS.  
 3. ALL DIMENSIONS TO BE IN ACCORDANCE WITH THE RELEVANT BUILDING REGULATIONS AND APPROVED DOCUMENTS.

**Client:** Gensler  
**Project:** PHASE 2 - ONE STATION HILL  
**Location:** LONDON, UK  
**Drawn:** J. J. J.  
**Check:** J. J. J.  
**Scale:** 1:100  
**Date:** 10/10/2023

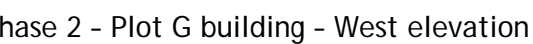
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**Project:** PHASE 2 - ONE STATION HILL  
**Location:** LONDON, UK  
**Drawn:** J. J. J.  
**Check:** J. J. J.  
**Scale:** 1:100  
**Date:** 10/10/2023

**Client:** Gensler  
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**Drawn:** J. J. J.  
**Check:** J. J. J.  
**Scale:** 1:100  
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**Client:** Gensler  
**Project:** PHASE 2 - ONE STATION HILL  
**Location:** LONDON, UK  
**Drawn:** J. J. J.  
**Check:** J. J. J.  
**Scale:** 1:100  
**Date:** 10/10/2023



Phase 2 - Plot G building - North elevation (fronting Station Square)



**GENERAL INFO**

## Gensler

[illegible]

**See legend on next page.**

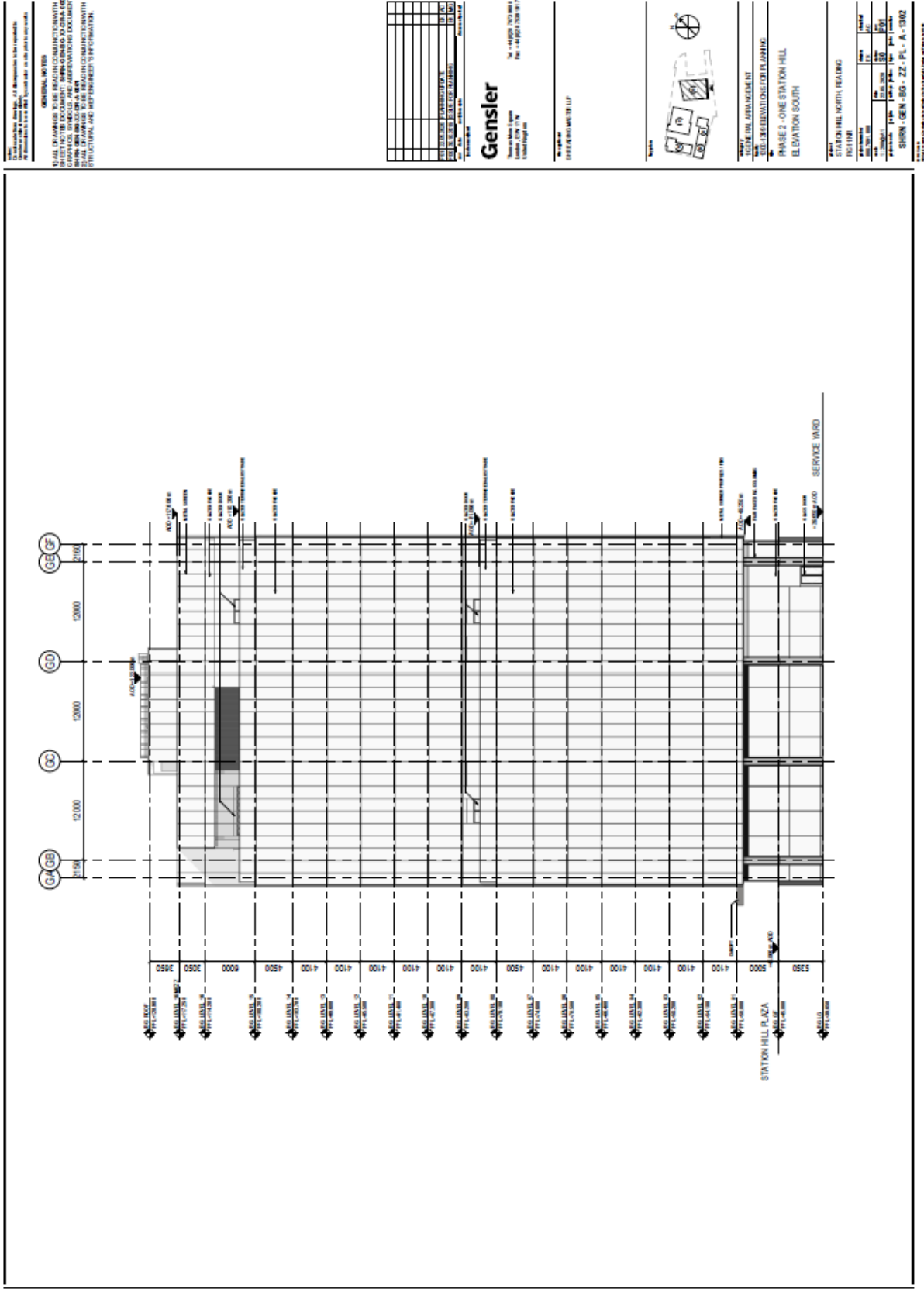


sheet  
GENERAL ARRANGEMENT  
DATE  
ELEVATIONS FOR PLANNING  
PHASE 2 - ONE STATION HILL  
ELEVATION WEST

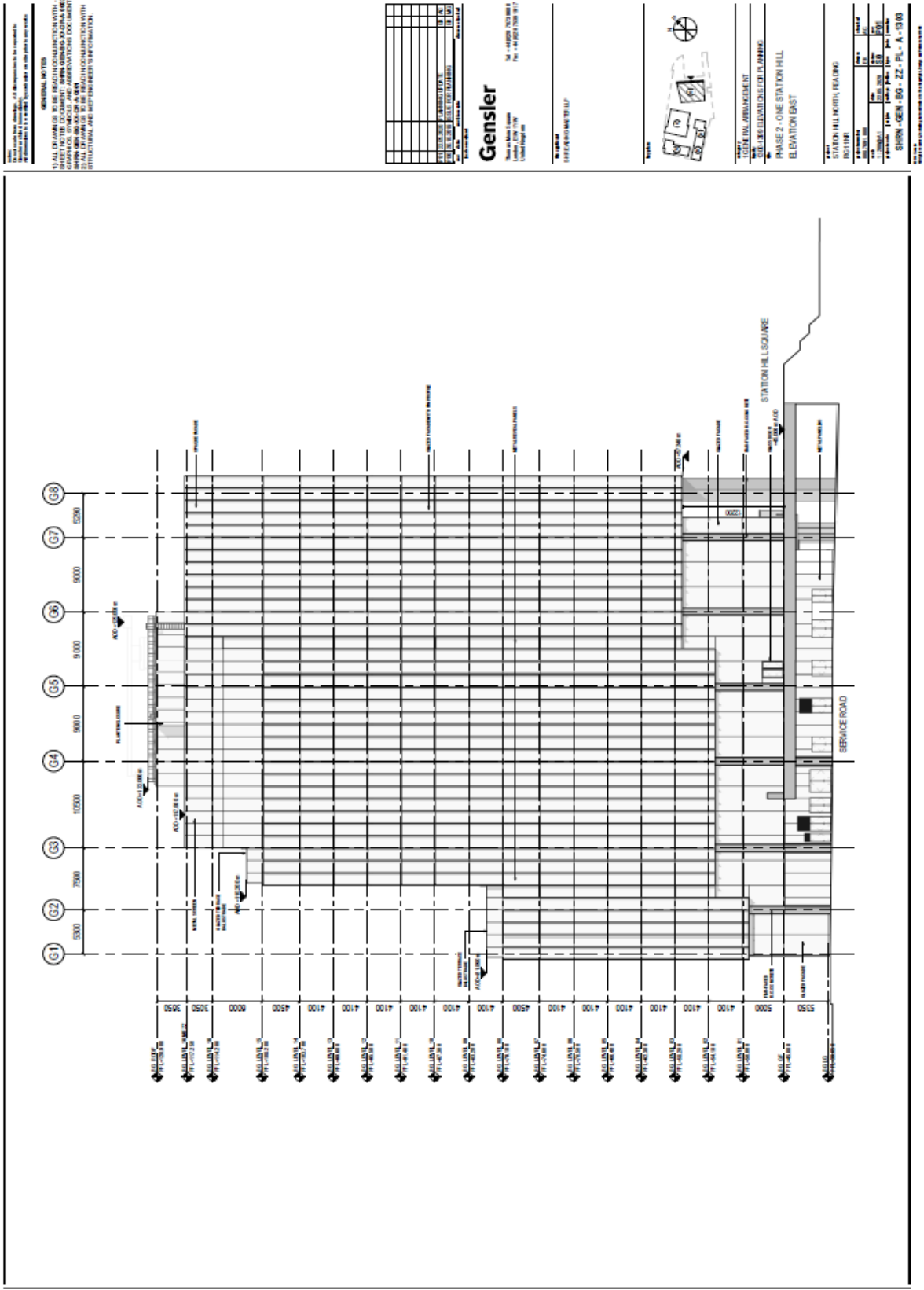
STATION HILL HEALTH, HCA, DRUG

Project Name	Start Date	End Date	Duration	Progress	Status
Project A	2023-01-01	2023-03-31	90 Days	85%	On Track
Project B	2023-02-01	2023-05-31	120 Days	60%	At Risk
Project C	2023-03-01	2023-06-30	120 Days	40%	Delayed
Project D	2023-04-01	2023-07-31	120 Days	20%	On Hold
Project E	2023-05-01	2023-08-31	120 Days	10%	Planned

SHURN • GEN • BG • ZZ • PL • A • 1301



Phase 2 - Plot G building - South Elevation to Garrard St.



Phase 2 - Plot G building - East elevation (facing Thames Tower)



View towards Plot G (Phase 2) office from Reading Station entrance. CGI image from Design and Access Statement (illustrative).



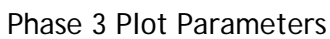


View towards Plot G (Phase 2) office from Garrard Street bridge. CGI image from Design and Access Statement (illustrative).



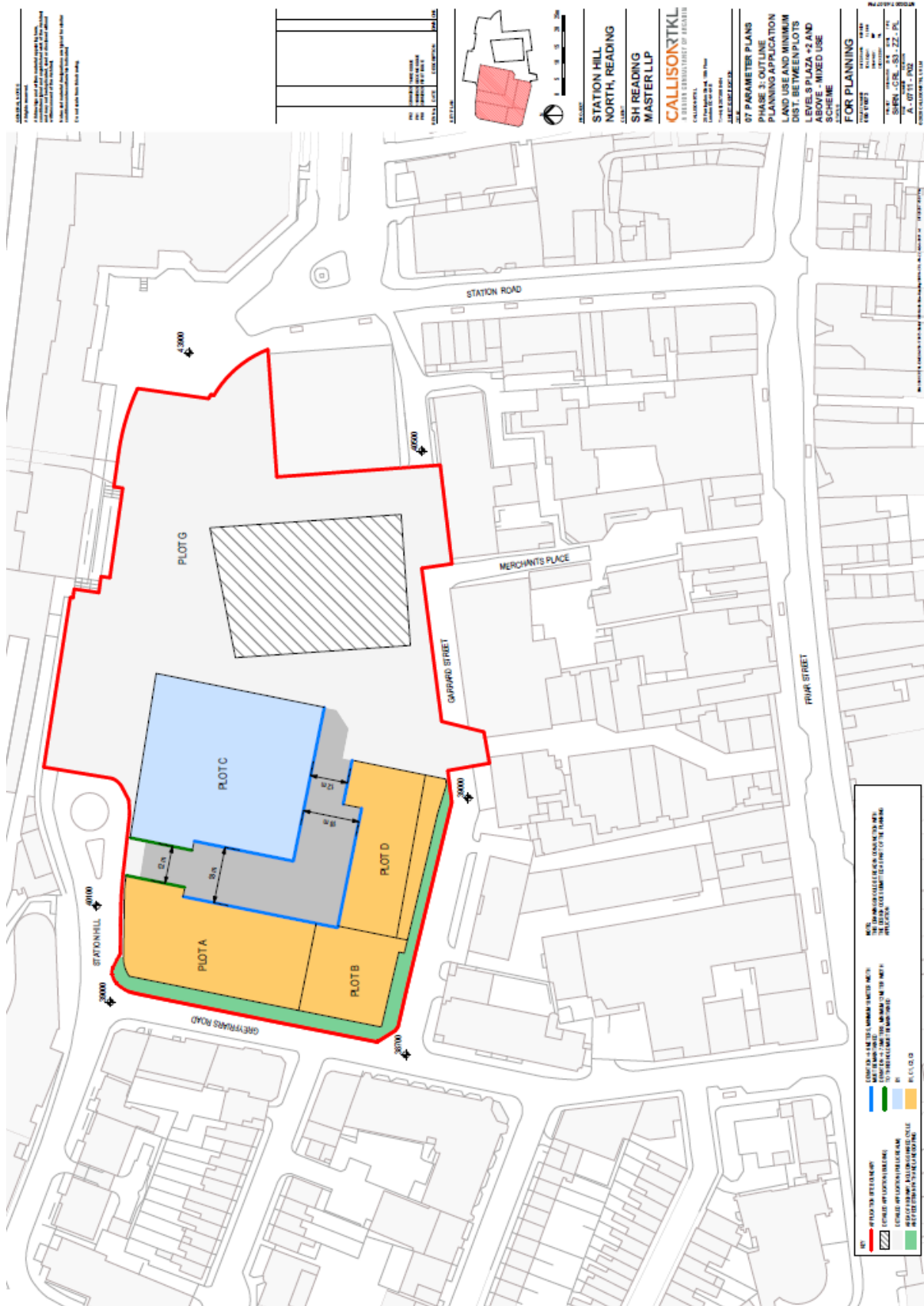








### Phase 3 Public Realm Parameters - Podium level and below second floor level



Phase 3 Parameters - Mixed Use Scheme - Second Floor and above.



The figure contains three main architectural drawings:

- Top Drawing (Site Plan):** A plan view of the development site. It shows four plots labeled PLOT A, PLOT B, PLOT C, and PLOT D. PLOT A and PLOT B are on the left, PLOT C is at the top, and PLOT D is on the right. The site is bounded by GREYHOUND ROAD to the north, STATION HILL to the east, and GARDING STREET to the south. A dashed green line indicates the 'OUTLINE OF MAXIMUM EXISTENT EXTERIOR' and a solid green line indicates the 'THREE METER BEYOND EXISTING EXTERIOR'. A 'STREET LEVEL' is marked with an arrow. A north arrow and a scale bar (0 to 20m) are also present.
- Bottom Left Drawing (PARAMETER LONG SECTION A):** A cross-section of the site. It shows the vertical relationship between the plots and the surrounding streets. The section is labeled '1' and 'PARAMETER LONG SECTION A'. It shows the 'STREET LEVEL' and the 'GREYHOUND ROAD' level. The section is drawn at a scale of 1:100.
- Bottom Right Drawing (PARAMETER CROSS SECTION B):** A cross-section of the site. It shows the vertical relationship between the plots and the surrounding streets. The section is labeled '2' and 'PARAMETER CROSS SECTION B'. It shows the 'STREET LEVEL' and the 'STATION HILL' level. The section is drawn at a scale of 1:100.





Existing public realm on Station Hill (lower level) looking east towards underpass and existing steps.



View South west from Station Square - NCP car park (Phase 2) to left of image Xaffinity House (Phase 3) to centre of image.





View west from Station Square along Station Hill

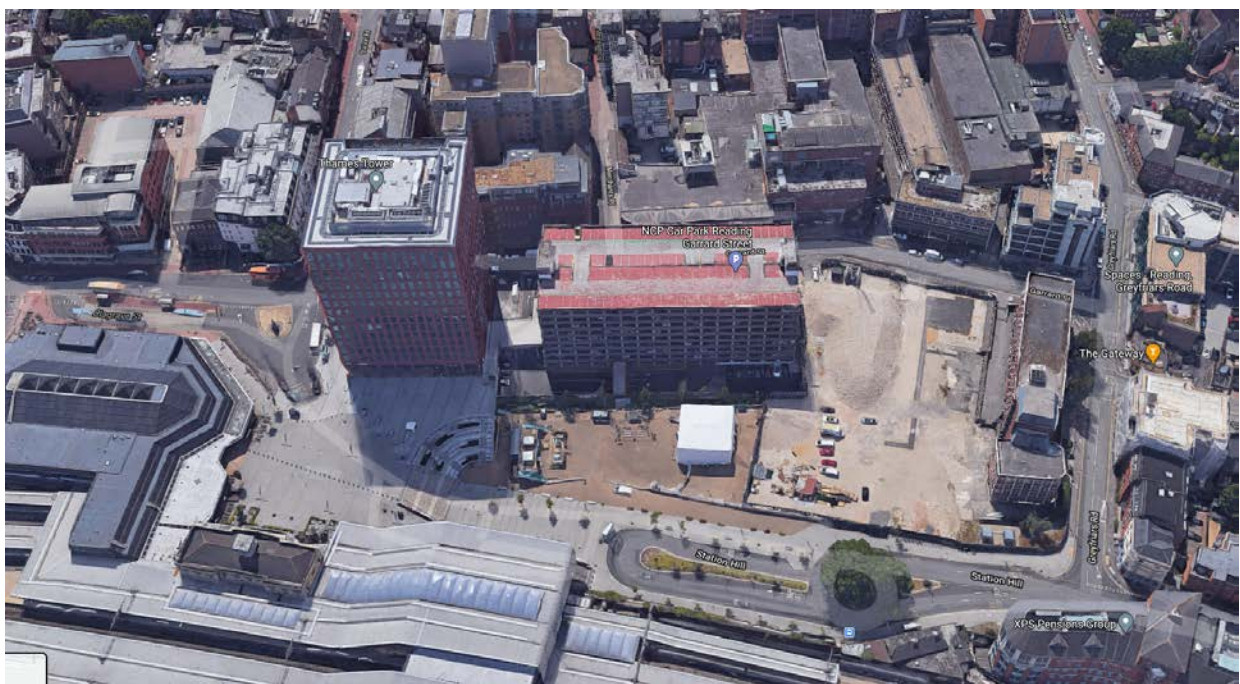


Garrard Street (November 2020) showing cleared Phase 1 site.





Aerial View north (Source: [www.google.co.uk/maps](http://www.google.co.uk/maps) 22/12/2020)



Aerial View South (Source: [www.google.co.uk/maps](http://www.google.co.uk/maps) 22/12/2020)