

LOCHAILORT NEWBURY LIMITED

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Lydia Mather
Senior Planning Officer
West Berkshire Council
Market Street
Newbury
Berkshire **RG14 5LD**

Monday 16th August 2021
Your reference: 21/00379/FULMAJ

Dear Lydia

Revised plans submission: redevelopment of the *Kennet Centre*, Newbury RG14 5EN

Thank you for your assistance to date with the above planning application, and for the constructive dialogue during our recent meetings with Historic England and the Council's Conservation Officer.

From the inception of this project we have placed heritage centre-stage in relation to our redevelopment proposals. In accordance with Historic England's published guidance we have taken a staged approach which has identified the heritage assets and their settings which may be affected; assessing the degree to which these settings and views make a contribution to the assets' significance; understanding through a range of assessment methods the effects of the development on the significance (or ability to appreciate it); and exploring through iterative design amendments how to avoid or minimise any harm whilst maximising enhancement.

The crux is whether there is harm – or perceived harm – to heritage assets. We believe that height gives definition to the development, rather than causing harm. Instead of trying to hide the scheme away in the centre of town, in our view Newbury would benefit from a wayfinding features that signpost the town centre intuitively on the skyline.

"Market town"

Several times we have been told that Newbury is a *"market town"* with the inference that this confers a special or additional layer of protection. We would agree that Newbury is a market town in the broader sense of the definition and from a referencing point it a reasonable assumption to call it a market town. However, it is not, in the strictest definition of a market town, as there is no definition of a *"market town"* in the July 2021 *National Planning Policy Framework* and no special policy for such places. The most recent Government definition was in the *Rural White Paper* (2000) which put a population limit of 20,000 on a place being called a *"market town"*, to recognise that historically the majority of our town and cities had a market but many have evolved and grown since. By way of local examples:

Swindon ("Market Street")	population 185,600
Reading ("Market Place")	population 161,780
Basingstoke ("Market Place")	population 113,760
High Wycombe ("Market Place")	population 125,250
Guildford ("Market Street")	population 77,050
Maidenhead ("Market Street")	population 70,370

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Whilst referring to it loosely as a market town – and one of which we are proud to be a part – nonetheless history tells us that market towns evolve over time. In doing so, the organic evolution of our towns sees buildings growing higher not only to make best use of land, but also to reflect the latest building techniques and architectural technologies.

The natural growth and evolution of these towns has not been restricted, and neither should Newbury's ongoing adaption to meet its future needs. It is the vibrancy that must be captured and enhanced, and it is this ethos that we have tried to embrace.

Taller buildings

We have carefully followed Historic England's guidance in *The Setting of Heritage Assets and Tall Buildings*, with part of our process being a review of how Historic England has reacted to other town centre redevelopment schemes around the country. We have noted that Historic England has frequently objected on height grounds, where it considers that height is out of scale in its context.

We would point out though that Newbury is not without its tall buildings already. For example, the Town Hall clock tower is 32.68m AOD and the telephone exchange is taller still at 33.76m AOD. Whilst the latter is a poor example of design, no doubt it will be redeveloped in due course and will grow taller when that happens. The balance struck must always be viability against perceived harm, and that is the balance which now needs to be weighed when redeveloping the *Kennet Centre*.

Newbury Town Council and the Newbury Society

We are grateful for the clear and comprehensive manner in which these consultees presented their comments, and have noted that both civic bodies welcomed redevelopment in principle but raised concerns about the height of our original proposals. We have given very careful thought to their height concerns which, in the context of the discussions we have had with Historic England and the Council's Conservation Officer, has led us to amend our plans.

Car parking

The scheme as originally submitted had 83 undercroft car parking spaces together with 123 spaces on the new car park deck to the multi-storey car park, which resulted in a net gain of 140 spaces on top of the 415 that already exist in the multi-storey car park. The proposals also incorporate a host of other sustainable travel and transport measures. We emphatically maintain that the multi-storey car park was built to serve the Kennet Centre, which will no longer exist. The retail offering on the site has been reduced by 90% and on top of this, additional spaces have been provided in the new multi-storey car park beside the railway station.

Given West Berkshire's corporate declaration of a Climate Emergency this only goes to reinforce our forward-thinking strategy for this element of the scheme, and in fact there could be an argument that there are too many spaces and potentially there should be a reduction in line with the reduced number of dwellings now proposed.

Affordable housing

We have attached a *Redevelopment Benefits* spider diagram and given the Net Zero Carbon aspirations for this scheme, it should be borne against the particularly expensive cost of a brownfield redevelopment on this heritage site. We have submitted a detailed *Financial Viability Appraisal* and we are waiting to hear back from the Council on this. In the mean time, we also enclose an extract from that submission which identifies £35M of extra-over costs in relation to the development of this heritage scheme.

Submission of revised plans

In light of all the above we have prepared a comprehensive package of revised plans which amend the scheme as follows:

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- (i) The tallest element (Block A) has been **reduced by 2 storeys** meaning that the scheme's highest part is now 9 storeys compared with the 11 storeys originally proposed. Part of the 8th floor has also been omitted, further reducing the massing of this block such that its revised maximum height of 32.38m AOD is now **lower than the Town Hall clock tower**;
- (ii) The second tallest element (Block B) has been **reduced by 1 storey**, reducing the block's height to 31.54m AOD so that it too remains lower than the Town Hall clock tower and almost an entire storey lower than the telephone exchange;
- (iii) Block C (fronting Cheap Street) has been **reduced and set further back** from 33/34 Cheap St;
- (iv) The roofscape of Blocks A, B, C and F (the latter fronting Bartholomew Street) have all been amended, further **reducing the scheme's height and massing**.

Given the above significant reductions, the **total quantum of development has been reduced by 21 flats to 381 flats**, down from the 402 flats as originally proposed. *Accurate Visual Representations* comparing the revised proposals with those originally submitted are included with the revised plans, as is an updated *Design & Access Statement* which explores further how the reduced height of the development relates to its context, and also includes a range of additional local precedents.

The elements of the development which have previously received praise remain unaffected, including:

- Our ambitious sustainability strategy, with its Ground-Source Heat Pump and rooftop solar panels, and aspiration to achieve net zero carbon in a major and positive response to the locally-declared Climate Emergency
- New streets that will create a crucial new pedestrianised link between the railway station and the Town Centre & bus station
- Creation of a new mixed-use quarter that will enhance the attractiveness of the Town Centre as a destination, with new spaces for local, independent and artisan businesses that will help enhance Newbury's unique and special identity
- Retention and improvement of the Vue cinema and leisure facilities

Indeed, because the benefits of redevelopment are so numerous we have prepared the attached *Redevelopment Benefits* graphic which summarises the scheme's many and manifest benefits.

Revised application composition

In light of these amendments, the application composition is revised as follows:

Layout drawings

	Reference	Title	Status
001	Drawing P0-001	Site location plan	Retained
002	Drawing P0-010	Existing site plan	Retained
003	Drawing P0-020	Existing elevations	Retained
004	Drawing P0-030	Demolition site plan	Retained
005	Drawing P0-040	Demolition elevations	Retained
006	Drawing P0-100	Proposed site plan – ground floor	Retained
007	Drawing P0-101	Proposed site plan – first floor	Retained
008	Drawing P0-102	Proposed site plan – second floor	Retained
009	Drawing P0-103	Proposed site plan – third floor	Superseded
010	Drawing P0-104	Proposed site plan – fourth floor	Superseded
011	Drawing P0-105	Proposed site plan – fifth floor	Superseded
012	Drawing P0-106	Proposed site plan – sixth floor	Superseded
013	Drawing P0-107	Proposed site plan – seventh floor	Superseded
014	Drawing P0-108	Proposed site plan – eighth floor	Superseded
015	Drawing P0-109	Proposed site plan – ninth floor	Withdrawn – floor deleted
016	Drawing P0-110	Proposed site plan – tenth floor	Withdrawn – floor deleted
017	Drawing P0-111	Proposed site plan – roof	Superseded

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Proposed floorplans: Blocks A, C, D & cinema wing

	Reference	Title	Status
018	Drawing P1-100	Proposed plan – ground floor	Retained
019	Drawing P1-101	Proposed plan – first floor	Retained
020	Drawing P1-102	Proposed plan – second floor	Retained
021	Drawing P1-103	Proposed plan – third floor	Superseded
022	Drawing P1-104	Proposed plan – fourth floor	Superseded
023	Drawing P1-105	Proposed plan – fifth floor	Superseded
024	Drawing P1-106	Proposed plan – sixth floor	Superseded
025	Drawing P1-107	Proposed plan – seventh floor	Superseded
026	Drawing P1-108	Proposed plan – eighth floor	Superseded
027	Drawing P1-109	Proposed plan – ninth floor	Withdrawn – floor deleted
028	Drawing P1-110	Proposed plan – tenth floor	Withdrawn – floor deleted
029	Drawing P1-111	Proposed plan – roof	Superseded

Proposed floorplans: Blocks B, E, F, G & H

	Reference	Title	Status
030	Drawing P1-200	Proposed plan – ground floor	Retained
031	Drawing P1-201	Proposed plan – first floor	Retained
032	Drawing P1-202	Proposed plan – second floor	Retained
033	Drawing P1-203	Proposed plan – third floor	Superseded
034	Drawing P1-204	Proposed plan – fourth floor	Superseded
035	Drawing P1-205	Proposed plan – fifth floor	Superseded
036	Drawing P1-206	Proposed plan – sixth floor	Superseded
037	Drawing P1-207	Proposed plan – seventh floor	Superseded
038	Drawing P1-208	Proposed plan – eighth floor	Superseded
039	Drawing P1-209	Proposed plan – ninth floor	Withdrawn – floor deleted
040	Drawing P1-210	Proposed plan – roof	Superseded

Proposed floorplans: Offices and car park

	Reference	Title	Status
041	Drawing P1-300	Proposed plan – ground floor	Retained
042	Drawing P1-301	Proposed plan – first floor	Retained
043	Drawing P1-302	Proposed plan – second floor	Retained
044	Drawing P1-303	Proposed plan – third floor	Retained
045	Drawing P1-304	Proposed plan – fourth floor	Retained
046	Drawing P1-305	Proposed plan – fifth floor	Retained
047	Drawing P1-306	Proposed plan – roof	Retained

Proposed elevations

	Reference	Title	Status
048	Drawing P3-101	Block A: south and west elevations	Superseded
049	Drawing P3-102	Block A: east and north elevations	Superseded
050	Drawing P3-103	Block B: east and north elevations	Superseded
051	Drawing P3-104	Block B: south and west elevations	Superseded
052	Drawing P3-105	Block C: all elevations	Superseded
053	Drawing P3-106	Block D: all elevations	Superseded
054	Drawing P3-107	Blocks E & F: west & east elevations	Superseded
055	Drawing P3-108	Block E: all other elevations	Superseded
056	Drawing P3-109	Block F: all other elevations	Superseded
057	Drawing P3-110	Blocks G & H: west & east elevations	Superseded
058	Drawing P3-111	Block G: all other elevations	Superseded
059	Drawing P3-112	Block H: all other elevations	Superseded
060	Drawing P3-113	Offices elevations: south and east	Superseded
061	Drawing P3-114	Offices elevations: north and west	Superseded

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062	Drawing P3-115	Car park elevations	Retained
095	Drawing P3-116	Additional elevations, Blocks D H & car park	Retained

Landscape & public realm

	Reference		
063	01-00-DR-L-1000-P01	Ground Floor Landscape Masterplan	Retained
064	01-ZZ-DR-L-1100-P03	Roof Level Landscape Masterplan	Superseded
065	01-00-DR-L-1200-P02	Landscape Plan – Ground Floor	Retained
066	01-00-DR-L-1201-P02	Landscape Plan – Level 01	Retained
067	01-00-DR-L-1202-P02	Landscape Plan – Level 02	Retained
068	01-00-DR-L-1203-P02	Landscape Plan – Level 03	Superseded
069	01-00-DR-L-1205-P02	Landscape Plan – Level 05	Retained
070	01-00-DR-L-1206-P02	Landscape Plan – Level 08	Superseded
071	01-00-DR-L-1207-P02	Landscape Plan – Level 10	Retained
072	01-ZZ-DR-L-1208-P03	Landscape Plan – Biodiverse Roofs	Retained
073	P20621-E-PV-001-A	Car park: proposed PV roof plan	Retained
074	P20621-E-PV-002-A	Offices: proposed PV roof plan	Retained

Supporting reports

	Title	Author	Status
075	Design & Access Statement	Collado-Collins	Superseded
076	Planning Statement	Lochailort Newbury	Retained
077	Sustainability & Energy Efficiency Statement	Envision	Retained
078	Heritage & Townscape Visual Impact Assessment	Montagu Evans	Retained
079	Accurate Visual Representations Report	Anderson Terzie	Superseded
080	Transport Assessment	Stewart Michael Associates	Superseded
081	Framework Travel Plan	Stewart Michael Associates	Retained
082	Ecological Impact Assessment	EPR	Retained
083	Flood Risk Assessment	Robert Bird Group	Retained
084	Drainage Statement	Robert Bird Group	Retained
085	Retail Demand Report	Rivington Hark	Retained
086	Statement of Community Involvement	Lochailort Newbury	Retained
087	Health & Wellbeing Statement	Lochailort Newbury	Retained
088	Noise Assessment	Stewart Michael Associates	Retained
089	Air Quality Assessment	Stewart Michael Associates	Retained
090	Framework Servicing and Management Plan	Lochailort Newbury	Retained
091	Asbestos Survey Report	Armour Analytical Services	Retained
092	Phase I Geoenvironmental Desk Study Report	Soiltechnics	Retained
093	Ground Investigation Report	Soiltechnics	Retained
094	Flood Risk Sequential Test Report	Lochailort Newbury	Retained
096	Supplementary AVR Report	Anderson Terzie	Superseded

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Layout drawings - *as revised*

	Reference	Title	Status
097	Drawing P0-103 Rev P2	Proposed site plan – third floor	Revised plan 16/08/2021
098	Drawing P0-104 Rev P2	Proposed site plan – fourth floor	Revised plan 16/08/2021
099	Drawing P0-105 Rev P2	Proposed site plan – fifth floor	Revised plan 16/08/2021
100	Drawing P0-106 Rev P2	Proposed site plan – sixth floor	Revised plan 16/08/2021
101	Drawing P0-107 Rev P2	Proposed site plan – seventh floor	Revised plan 16/08/2021
102	Drawing P0-108 Rev P2	Proposed site plan – eighth floor	Revised plan 16/08/2021
103	Drawing P0-111 Rev P2	Proposed site plan – roof	Revised plan 16/08/2021

Proposed floorplans: Blocks A, C, D & cinema wing - *as revised*

	Reference	Title	Status
104	Drawing P1-103 Rev P2	Proposed plan – third floor	Revised plan 16/08/2021
105	Drawing P1-104 Rev P2	Proposed plan – fourth floor	Revised plan 16/08/2021
106	Drawing P1-105 Rev P2	Proposed plan – fifth floor	Revised plan 16/08/2021
107	Drawing P1-106 Rev P2	Proposed plan – sixth floor	Revised plan 16/08/2021
108	Drawing P1-107 Rev P2	Proposed plan – seventh floor	Revised plan 16/08/2021
109	Drawing P1-108 Rev P2	Proposed plan – eighth floor	Revised plan 16/08/2021
110	Drawing P1-111 Rev P2	Proposed plan – roof	Revised plan 16/08/2021

Proposed floorplans: Blocks B, E, F, G & H - *as revised*

	Reference	Title	Status
111	Drawing P1-203 Rev P2	Proposed plan – third floor	Revised plan 16/08/2021
112	Drawing P1-204 Rev P2	Proposed plan – fourth floor	Revised plan 16/08/2021
113	Drawing P1-205 Rev P2	Proposed plan – fifth floor	Revised plan 16/08/2021
114	Drawing P1-206 Rev P2	Proposed plan – sixth floor	Revised plan 16/08/2021
115	Drawing P1-207 Rev P2	Proposed plan – seventh floor	Revised plan 16/08/2021
116	Drawing P1-208 Rev P2	Proposed plan – eighth floor	Revised plan 16/08/2021
117	Drawing P1-210 Rev P2	Proposed plan – roof	Revised plan 16/08/2021

Proposed elevations - *as revised*

	Reference	Title	Status
118	Drawing P3-101 Rev P2	Block A: south and west elevations	Revised plan 16/08/2021
119	Drawing P3-102 Rev P2	Block A: east and north elevations	Revised plan 16/08/2021
120	Drawing P3-103 Rev P2	Block B: east and north elevations	Revised plan 16/08/2021
121	Drawing P3-104 Rev P2	Block B: south and west elevations	Revised plan 16/08/2021
122	Drawing P3-105 Rev P2	Block C: all elevations	Revised plan 16/08/2021
123	Drawing P3-106 Rev P2	Block D: all elevations	Revised plan 16/08/2021
124	Drawing P3-107 Rev P2	Blocks E & F: west & east elevations	Revised plan 16/08/2021
125	Drawing P3-108 Rev P2	Block E: all other elevations	Revised plan 16/08/2021
126	Drawing P3-109 Rev P2	Block F: all other elevations	Revised plan 16/08/2021
127	Drawing P3-110 Rev P2	Blocks G & H: west & east elevations	Revised plan 16/08/2021
128	Drawing P3-111 Rev P2	Block G: all other elevations	Revised plan 16/08/2021
129	Drawing P3-112 Rev P2	Block H: all other elevations	Revised plan 16/08/2021
130	Drawing P3-113 Rev P2	Offices elevations: south and east	Revised plan 16/08/2021
131	Drawing P3-114 Rev P2	Offices elevations: north and west	Revised plan 16/08/2021

Landscape & public realm - *as revised*

	Reference	Title	Status
132	01-ZZ-DR-L-1100	Roof level landscape masterplan	Revised plan 16/08/2021
133	01-03-DR-L-1203 Rev P03	Landscape plan – Level 03	Revised plan 16/08/2021
134	01-08-DR-L-1206 Rev P03	Landscape plan – Level 08	Revised plan 16/08/2021

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Supporting reports - *as revised*

	Title	Author	Status
135	Design & Access Statement August 2021	Collado Collins	Revised report 16/08/2021
136	AVR Comparison Images Report August 2021	Anderson Terzic	Revised report 16/08/2021
137	Transport Assessment August 2021	Stuart Michael Associates	Revised report 16/08/2021

Amended description of the proposed development

In light of the enclosed revised plans submission, the description of the proposed development should be amended as follows:

“Full: Phased redevelopment of the Kennet Centre comprising (1) partial demolition of existing building (ii) flexible-use commercial space (iii) headquarters office building (iv) 381 dwellings plus residents ancillary facilities (v) access, car parking and cycle parking (vi) landscaping & open space (vii) sustainable energy installations (viii) associated works”

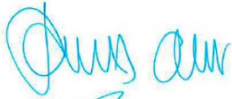
Extension of the target statutory determination date

In order to give the Local Planning Authority time to reconsult on our revised plans submission, we agreed an extension to the target statutory determination date to expire on **Friday 15th October 2021**.

As ever, if you have any questions please contact us at your convenience.

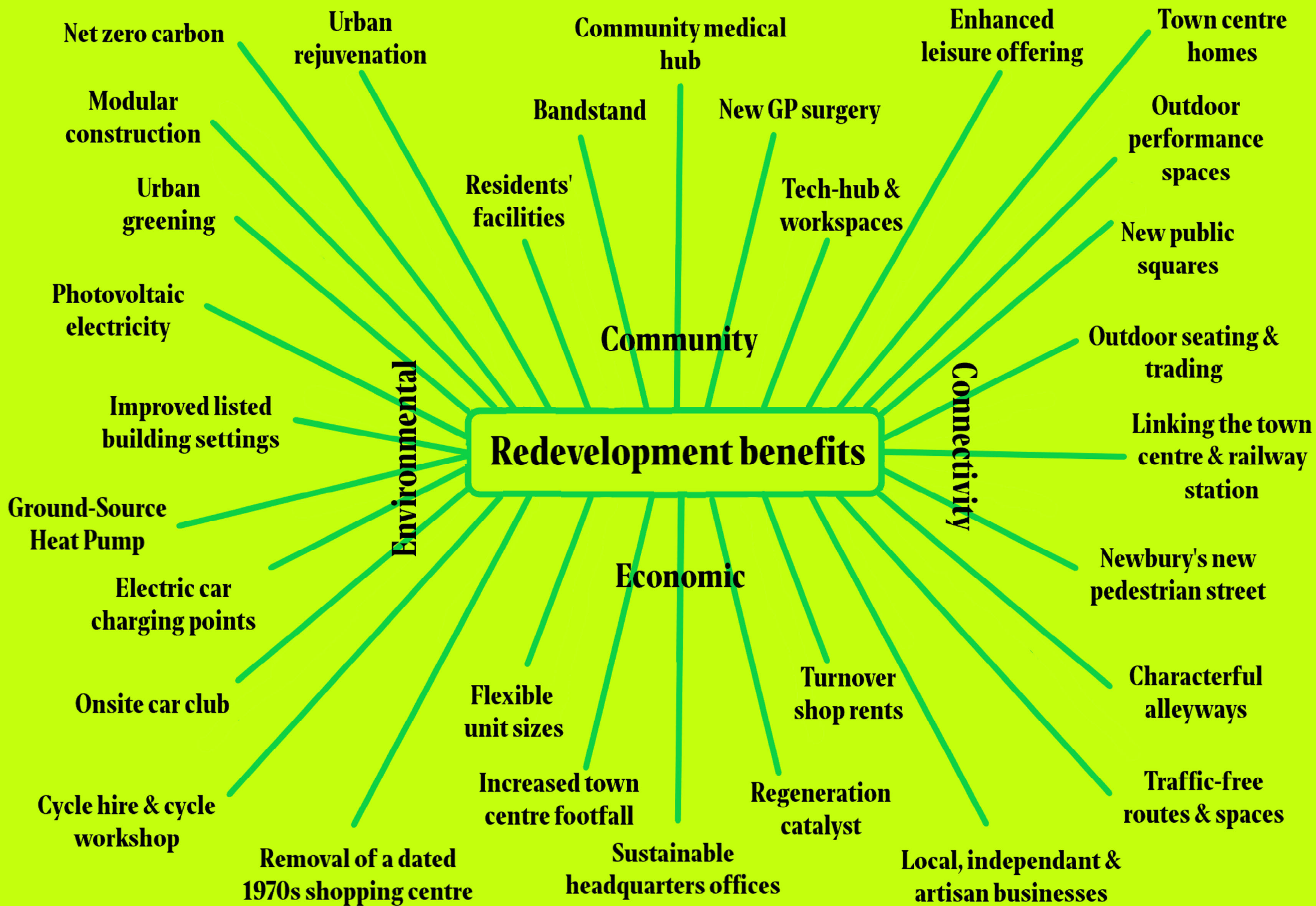
With kind regards

Yours sincerely



James Croucher MTP MRTPI
Planning Director

Enclosures: (i) as listed in *blue* in the tables above
(ii) *Redevelopment Benefits* spider diagram
(iii) Extract from previously-submitted *Financial Viability Appraisal*



Extra-Over Costs in Relation to Heritage/Site constraints

Total
(incl prelims, OHP)

1.00	Heritage constraints, lateral development rather than high rise which manifests itself in additional costs as follows:	
1.01	Lifts - additional required for higher number of cores	£696,220
1.02	Stairs - additional required for higher number of cores	£397,840
1.03	Extensive roofs - higher quantity due to lateral layout	£2,042,191
1.04	Structural cores - additional required for higher number of cores	£1,045,681
1.05	Substations - additional required to serve lateral layout	£376,743
1.06	M&E distribution - increased distribution due to lateral layout	£313,691
1.07	Partition walls - additional required for extensive circulation	£1,352,030
2.00	Lateral layout requires extensive substructure works - site preparation and piling with associated pile caps and ground slab	
2.01	Piling works - 16,225 linear metres	£2,013,169
2.02	Pile caps	£848,874
2.03	Site levelling/prep	£605,187
2.04	Ground slab	£1,646,563
3.00	Ambitious sustainability credentials including ground source heating system & photovoltaics targeting 300t carbon savings per annum	
3.01	Ground source heat system - standing columns	£4,371,390
3.02	Photovoltaics to MSCP	£452,091
3.03	Photovoltaics to office building roof	£144,669
4.00	Works required to integrate existing cinema to the development	
4.01	Works to create new access/entrance incl fire exits, etc	£656,116
4.02	Fit-out to internal units	£420,369
5.00	Extensive demolition works required	
5.01	Provisional sum for demolition of entire existing Kennet Shopping Centre	£1,989,201
6.00	Extension of existing multi-storey car park to provide additional level of parking including required extension to the stair/lift core	
6.01	Additional parking level incl structure, M&E and road markings, etc	£840,558
6.02	Extend lift stops, core, lobby, etc	£347,206
7.00	Creation of new streets and yards incl cladding street with retail, workshops, health centre, etc	
7.01	Provision of retail, workshops, health centre, etc	£4,958,426
7.02	Create external streetscape	£3,043,176

8.00	Improvements to traffic intersections	
8.01	Cheap Street - Drop kerbed, relocate Bus Stop and Lamp Column	£18,084
8.02	Market Street – new lay-by, bus stop/shelter relocation, proposed zebra raised crossing, kerb line /refuse island/taxi rank/footway adjustments	£192,892
8.03	Market St / Bartholomew St Junction – Remove existing signals and replace with new arrangement to allow for all traffic movements, including resurfacing	£218,209
8.04	Bartholomew Street - Drop kerbed, bollards/signage; signalised junction	£271,255
9.00	Sky bridges required to connect separate buildings due to lateral layout	
9.01	Skybridge 1 (enclosed, serviced walkway)	£486,848
9.02	Skybridge 2 (enclosed, serviced walkway)	£438,492
9.03	Skybridge 3 (open footbridge)	£80,291
10.00	Tenant amenities - required to serve each separate building and therefore far more extensive than usual	
10.01	Provision of 1,408m2 of tenant amenity space to serve each buildings as per lateral layout	£1,551,499
11.00	Extensive undercover car/cycle parking, deliveries & vehicular circulation service yard	
11.01	Cycle parking	£442,727
11.02	Deliveries & vehicular circulation service yard	£2,653,377
TOTAL		£35,000,000