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WALSINGHAM PLANNING

SPECIALIST PLANNING & DEVELOPMENT CONSULTANTS

Planning Statement

Former George and Dragon, 162 Bath
Road, Reading, RG30 2HA

On behalf of Greene King Commercial Investments
Limited

MARCH 2023

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APPENDIX I – MAP AND LIST OF LOCAL ALTERNATIVE FACILITIES

I INTRODUCTION

I.1 Walsingham Planning has been instructed by Greene King Commercial Investments Limited (Greene King) to prepare this Planning Statement in support of an application for the redevelopment of the former George and Dragon site, 162 Bath Road, Reading.

I.2 The application seeks full planning permission for:

“Demolition of existing pub / restaurant and erection of 1 no. drive thru retail / bakery (Class E) including erection of supporting structures, together with alterations to means of access, car parking, landscaping and associated works.”

I.3 The redeveloped site will be occupied and managed by Greggs.

I.4 The application comprises a comprehensive set of planning drawings, together with the following supporting documents which should be read alongside this Planning Statement:

- Design and Access Statement prepared by JDA;
- Viability Study prepared by Savills;
- Sequential Assessment prepared by Walsingham Planning;
- Heritage Statement and Building Recording prepared by Wardell Armstrong;
- Transport Assessment prepared by RGP;
- Travel Plan prepared by RGP;
- Noise Impact Assessment prepared by E3P;
- Ventilation Report prepared by Concept MEP;
- Arboricultural Impact Assessment and Method Statement prepared by E3P;
- Preliminary Ecological Appraisal and Bat Roost Assessment prepared by RSK;
- Bat Survey Report prepared by RSK;
- Tree Climbing Survey Letter prepared by RSK;
- Biodiversity Metric Report prepared by E3P;
- Sustainability Statement prepared by Greenbuild;
- Air Quality Assessment prepared by E3P;
- Phase 1 Site Investigation and Preliminary Risk Assessment prepared by Remada;
- Phase 2 Ground Investigation Report prepared by Remada; and
- Drainage Statement prepared by Glanville
- Lighting Report prepared by Concept.

I.5 This Statement is structured as follows:

- **Section 2** provides background information about the site, including a description of the site and its surroundings, site planning history and constraints.
- **Section 3** sets out the proposed development and provides background to the Greggs operation;
- **Section 4** identifies the relevant planning policies and guidance;
- **Section 5** considers the planning matters concerning the principle of the redevelopment of the site.
- **Section 6** considers all other material considerations, including technical planning issues.
- **Section 8** identifies how the proposal will contribute to the objectives of sustainable development.
- **Section 9** contains our conclusions which is that the application scheme accords with the development plan and thus should be approved without delay.

2 APPLICATION BACKGROUND

SITE

- 2.1 The application site extends to an area of approximately 0.25 ha and comprises the George and Dragon amenity pub / restaurant. The premises were closed in March 2020 at the start of the Covid19 pandemic and have remained closed ever since.
- 2.2 Whilst closure occurred due to Covid, the business had already been earmarked for closure as a result of poor and declining trading over a period of many years. The premises were economically unviable and an unsustainable business proposition. Covid t simply brought forward a closure that was inevitable.
- 2.3 At the time the premises ceased trading, they were operating under Greene Kings Hungry Horse brand and had done so since the applicant acquired the premises in 1999. Prior to that the premises were operated by Morland and traded as a 'Morland Family and Friends'.
- 2.4 The site is rectangular in shape and comprises the pub/ restaurant building, together with its car park, a small outdoor seating area (to the west of the pub), unused areas of land to the east (laid to grass) and northeast (overgrown) and boundary landscaping.
- 2.5 The pub sits at the back edge of the pavement fronting onto Bath Road and is part single storey and part two-storeys. As is set out in the Heritage Statement and Building Recording, whilst there are some older parts to the building, it has had numerous modern extensions which has altered its external appearance and form and major internal alterations and reconfiguration. Consequently, the building is much altered building and of limited historic value.
- 2.6 The building is faced in red brick with elements of render. Older parts of the building have stone cills and brick detailing above the windows. The roof is covered in a mix of slate and red tiles and comprises a mix of different pitches. The roof above the kitchen is flat and accommodates the premises kitchen extract and ventilation system.
- 2.1 The building comprises the pub / restaurant, including its kitchen and back of house facilities at ground floor level with managers residential accommodation at first floor. The premises has a cellar which is located to the rear of the building below customer toilets.

- 2.2 The premises car park is located to the west of the building and is accessed from Bath Road at a single point in the southwest of the site. The access is served by a right-turn lane on Bath Road. The car park currently provides 31 car parking spaces, including 1 disabled space.
- 2.3 The premises has a beer garden / external seating area located to the west of the building which was formed by removing part of the car park in 2004. Prior to this the premises had no outdoor space and thus external seating.
- 2.4 Land directly to the east of the pub historically formed a separate site and was occupied by former a Smithy building. It is believed this building was demolished at some point in the 1960s creating a vacant development plot. The land was subsequently purchased and incorporated into the pub site, however it has not been actively used in association with the premises.
- 2.5 In terms of boundary treatment, the southern boundary is defined by the building and a low brick wall; the western boundary by a low brick wall and chain link fence; the northern boundary by a 1.8 metre high timber fence and the eastern boundary by the gable wall to no. 156 Bath Road and a fence. The northern and part of the western boundary also comprise substantial mature vegetation which screens the site from residential properties to the north.

SURROUNDINGS

- 2.6 The site is located on the A4 which is a main arterial route into and out of Reading and connects Reading with junction 12 of the M4 motorway to the west. Bath Road is characterised by a mix of commercial and residential uses and has a highly urbanised feel. Bath Road is dual carriageway in either direction for much of its length.
- 2.7 Immediately surrounding the site, there are residential properties to the north, east, south (on the opposite side of Bath Road) and west (on the opposite side of Morlands Avenue).
- 2.8 There are however also various commercial premises on Bath Road in close proximity of the site, including Aldi and Lidl supermarkets approximately 200m to the west of the site and a petrol filling station and a car dealership approximately 100m to the east. To the north of Morlands Avenue is an extensive school campus with grounds and sports facilities (Prospect School).
- 2.9 The site is around 3km to the south west of Reading Town Centre and is within the Southcote area.

- 2.10 The nearest designated centres to the site are Coronation Square Local Centre (around 800m from the site) and Meadway District Centre (around 900m to the north). Despite their respective distances, both Centres are well connected to the site.

ACCESSABILITY

- 2.11 The site is relatively accessible by public transport, being served by a nearby west-bound bus stop on the opposite side of Bath Road, which provides regular services to Newbury. The east-bound bus stop is located around 125m to the east and provides services to Reading Town Centre.
- 2.12 The pavement directly outside the site is very wide and is designed to accommodate pedestrians and cyclists. On the opposite side of Bath Road, the highway has a dedicated bus and cycle lane.

PLANNING HISTORY

- 2.13 The site has a lengthy history of applications and decisions. In addition to applications for advertisement consent, there are various planning permissions for alterations to the building dating back to the 1980s.
- **890744** – Planning application submitted in 1989 for single-storey side extensions to the public house and extension of the car park.
 - **910253** – Planning application submitted in 1992 for a front and side extension of the public house, revised elevations and additional car parking; conversion of a house to public house and self-contained first floor flat.
 - **920027** – Planning application submitted in 1992 for alteration of the roof at first floor level to accommodate an internal link passage.
 - **991927** – Planning application submitted in 2000 for a new door to the north elevation at first floor level, and four lighting poles in the car park.
 - **991349** – Planning application submitted in 2000 for new ducting to the flat roof areas to the rear of the building.

- **020049** – Planning application submitted in 2002 for change of use of land to the beer garden and erection of parapet screen for ductwork.
- **041007** – Planning application submitted in 2004 for alterations to form revised door and window openings at ground floor level. Alterations to the car park and formation of a beer garden.
- **041352** – Planning application submitted in 2004 for installation of new fire escape stair, air conditioning units and fence screen to rear of premises.
- **100017** – Planning permission granted in 2010 for the erection of a smoking shelter to the side of the public house.

2.14 None of the planning history is considered material to this planning application, however it is useful as it illustrates the extent of alterations that have been made to the premises over the years as well as the lack of investment in the premises.

2.15 Lack of investment is a good indicator that premises are struggling and that an operation may not be a sustainable and viable long-term business proposition. The lack of any planning applications since 2010 when considered alongside information in the Viability Study shows that the premises have been in decline for many years and that investment in the premises has simply not been viable.

DESIGNATIONS

2.16 The site receives not allocation or designation on the Proposals Map accompanying the adopted development plan. However, the site is noted as being within the main built-up area of Reading. The site is also identified as falling within an Air Quality Management Area related to the A6 Bath Road. The application is thus accompanied by an Air Quality Assessment.

2.17 There are no listed buildings on or near the site, and the site is not within or adjacent to a conservation area. The site is also not noted on the local Historic Environment Record. However, in pre-application advice the Council state that the building “*displays a high level and quality of Victorian architecture*” and “*upon consultation with the Council’s Conservation and Design Office, it is considered that the site would be considered a non-designated heritage asset*”. In acknowledgement and response to these comments, the application is supported by a Heritage Statement and Building Recording.

- 2.18 There are a number of trees around the northern and western perimeter of the site. They are not protected by Tree Preservation Order however.
- 2.19 The site is in a Flood Risk Zone I and has less than a 0.1% annual probability of river or sea flooding. A small area of the site to the west of the premises is identified as at low risk of surface water flooding.

3 DEVELOPMENT PROPOSALS

3.1 The application seeks full planning permission for:

“Demolition of existing pub / restaurant and erection of 1 no. drive thru retail / bakery (Class E) including erection of supporting structures, together with alterations to means of access, car parking, landscaping and associated works”

3.2 The redeveloped site will be occupied by Greggs who have been looking for a drive thru retail / bakery site in the area for some time. The scheme forms part of their current nationwide growth and drive thru expansion programme in response to customer demand for ‘food on the go’. The development will provide facilities for eating in, take-away and drive thru.

3.3 Redevelopment of the site for a drive thru Greggs unit will require the demolition of the existing vacant former pub/ restaurant building. As is set out elsewhere in this report and the Viability Study, the building needs to be demolished as it has no viable alternative use.

3.4 Alongside demolition of the building, it will be necessary to demolish the existing low level brick boundary wall to Bath Road and the west boundary and to remove 8 individual trees and two small tree groups. All demolition and tree removals are detailed on the submitted Demolition Plan and Arboricultural Impact Assessment.

3.5 In place of the existing premises, it is proposed to erect a new single-storey building. This will be positioned on part of the footprint of the existing building but will be set back from the Bath Road frontage. This is necessary in order to accommodate the drive thru lane and boundary planting.

3.6 The building, which is broadly rectangular in shape, will have a GEA of 211 sq.m and GIA of 186 sq.m and comprise a sales counter, restaurant/ seating area, kitchen and staff facilities and customer toilets. The building will have traditional form with a hipped roof. It will have a maximum height of 7 metres to ridge.

3.7 It is proposed that the building be faced in a mix of traditional and contemporary materials consisting of a brick plinth course and rendered panels finished in dark grey (RAL 7016) and cornflower blue (BS 78E53). The roof will be covered in Eternit roof tiles in blue / black. The choice of colour for the render reflects Greggs branding and is an essential element of the design.

- 3.8 Customer entrance doors will be positioned on the western side of the unit. A fire escape door and glazing will be installed on the northern elevation, alongside a serving hatch window on the southern elevation and a service door on the eastern elevation. The door and window frames will consist of aluminium finished in grey (RAL 7016).
- 3.9 An enclosed bin store area is provided adjacent the east elevation of the building which will provide storage for 1,100 litre bins. An external plant enclosure which is required to accommodate 3 external condensers is located adjacent the north elevation. Both areas are enclosed with timber louvres.
- 3.10 An external seating area including fixed umbrellas and seating will adjoin the northern and western sides of the building.
- 3.11 A 33 space car park to serve the premises is proposed to the west of the building. This will operate a one-way system around a central parking island and will comprising:
- Two disabled bays, located in close proximity to the entrance doors on the western side of the unit;
 - Two waiting bays, sited just beyond the exit from the drive thru lane;
 - 10 electric vehicle (EV) charging spaces, sited near the western site boundary, served by five electrical upstands;
 - 19 standard car parking spaces; and
 - Five Sheffield stands, providing parking for 10 bicycles.
- 3.12 The drive thru lane will run in a clockwise direction around the north, east and south of the building and will be accessed off the car park in the north of the site. A height restriction barrier will be situated at the entrance to the drive thru lane with a customer order point a few metres to the east. Collection will be from the collection window on the south elevation.
- 3.13 A small substation will occupy the southwest corner of the site, and this will be finished in green cladding.
- 3.14 The existing vehicular access to the site from Bath Road will be improved and widened as requested by the Highway Authority. A section of tactile paving on the public footpath will also be altered. In addition, the right-turn lane on Bath Road will be lengthened and 'Keep

Clear markings provided on the eastbound side of Bath Road to discourage any blocking of the site access.

- 3.15 In terms of servicing, deliveries will occur at off-peak hours during the unit's opening times (5am to 11pm on Mondays to Sundays). A 10m rigid delivery / refuse collection vehicle will enter and exit the site in a forward gear, and six parking spaces will be suspended to allow for the vehicle to manoeuvre and park. Deliveries will be planned for a specific time slot outside of peak trading hours and staff will be made aware of this in advance to cordon-off the necessary parking spaces.
- 3.16 Pedestrian access to the building will be achieved by way of a new footpath link from Bath Road. The footpath will provide direct access to the customer entrance doors on the western elevation of the building, via a crossing point over the drive thru lane.
- 3.17 Eight new lighting columns will be installed across the site to provide appropriate illumination of the car park, drive thru and areas around the building.
- 3.18 With regard to boundary treatment, It is proposed that the existing 1.8 metre high timber fence be retained along the eastern site boundary. In terms of the northern boundary, the existing 1.8 metre close boarded fence and planting will be retained, but will be supplemented by a section of 2.1 metre high acoustic fencing adjacent the plant enclosure. Along the western boundary the existing vegetation will be retained where possible and the chain link fence and wall replaced with 0.6 metre high knee rail. The southern boundary to Bath Road will be landscaped and kept open.
- 3.19 The site will be landscaped to a high standard with existing boundary planting retained where possible. Landscaping will be focused round the perimeter of the site and will include the planning of 7 new trees to replace those that need to be removed. 3 of these trees will be planted along the Bath Road frontage as requested in pre-application advice.
- 3.20 The scheme will demonstrate 77.41% net biodiversity gain as illustrated by the Biodiversity Metric Report. In response to advice from the applicant's ecologist and in order to enhance the ecological value of the site, the scheme also includes 2 bird boxes, 6 bat boxes, 3 insect houses as well as log piles and hedgehog houses.

GREGGS

- 3.21 Greggs is a strong and trusted brand which draws on its heritage in fresh bakery to compete successfully in the food-on-the-go market. It has more than 1,850 shops across the UK, serving millions of customers each week.
- 3.22 As on-the-go habitats change, Greggs has built its portfolio of shops to take the brand to where its customers want them to be. As a result, Greggs can be found in retail parks, shopping centres, industrial estates and on office parks. Greggs shops are also located where customers need them whilst travelling, with shops in travel hubs and at roadside locations with parking. It is within this context that the Company is rolling out its new drive thru concept, which is proposed at the application site.
- 3.23 Greggs have ambitious plans for the growth of their new drive thru concept. As is set out in the Sequential Assessment, these sites have different locational and site requirements to a traditional high street Greggs unit and require good visibility from the roadside, a good level of parking provision, a site of between 0.20 and 0.28 hectares, minimum traffic flows of 15,000 vehicles per day and sites on main arterial and commuter routes. The application site meets these requirements.

4 RELEVANT PLANNING POLICY

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

“If regard is to be had to the development plan for the purposes of any determination to be made under the Planning Acts, the determination should be made in accordance with the plan, unless material considerations indicate otherwise.”

4.2 Any issue that relates to the use and development of land and buildings is capable of being a material planning consideration. This includes Government statements of planning policy and supplementary planning guidance.

4.3 The Development Plan for the site comprises the Reading Local Plan, which was adopted in November 2019.

GOVERNMENT GUIDANCE

National Planning Policy Framework (2021)

4.4 The National Planning Policy Framework (NPPF) was updated in July 2021. It sets out the Government’s economic, environmental and social planning policies for England. These policies articulate the Government’s vision of sustainable development.

4.5 Paragraph 8 explains that the planning system has three overarching objectives for sustainable development. These are as follows:

- An economic objective – To help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
- A social objective – 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.
- An environmental role – To contribute to protecting and enhancing the natural, built and historic environment; including making effective use of land, helping to improve

biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 4.6 The NPPF sets out a presumption in favour of sustainable development. Paragraph 11 of the Framework states that *“plans and decisions should apply a presumption in favour of sustainable development.”* For decision-takers, this means *“approving development proposals that accord with an up to-date development plan without delay”*.
- 4.7 According to paragraph 81, planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both business needs and wider opportunities for development.
- 4.8 Section 7 of the Framework seeks to ensure the vitality of town centres and paragraph 87 states that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. According to Annex 2 of the NPPF, retail (including bakeries) and drive thrus are defined as main town centre uses.
- 4.9 Paragraph 88 states that when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.
- 4.10 With regard to the impact test, paragraph 90 requires an impact test for retail and leisure development outside of town centres that are over a proportionate locally set floorspace threshold or 2,500 sq m gross floor area where there is no locally set threshold.
- 4.11 Paragraph 91 confirms that where an application fails to satisfy the sequential test, it should be refused.
- 4.12 Section 8 of the Framework is concerning with promoting healthy and safe communities. Paragraph 92 explains that planning decisions should aim to achieve places which promote social interaction and are safe and accessible. Whilst paragraph 93 states that in order to provide the social, recreational and cultural facilities and services which a community needs,

planning decisions should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.

- 4.13 Section 9 of the Framework relates to transport and states that planning decisions should ensure developments that generate significant movements are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. Paragraph 110 explains that in considering development proposals, it should be ensured that safe and suitable access to the site can be achieved for all users.
- 4.14 Paragraph 111 states that development proposals should only be refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 4.15 Paragraph 112 sets out the criteria that development is required to comply with. It includes giving priority to pedestrian and cycle movements and facilitating access to high quality public transport services; addressing the needs of people with disabilities, creating places that are safe, secure and attractive; and allowing for the efficient delivery of goods.
- 4.16 Section 11 of the Framework relates to the effective use of land. Paragraph 119 states that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 120 states that planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.
- 4.17 Design is addressed at Section 12 of the Framework. Paragraph 126 states that good design is a key part of sustainable development and should contribute positively to making places better for people.
- 4.18 Paragraph 130 explains that planning decisions should ensure that developments function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character; establish a strong sense of place to create an attractive development; optimise the potential of the site; and create a safe, inclusive and accessible development.

- 4.19 Paragraph 131 highlights the important contribution that trees make to the character and quality of urban environments. It states that planning decisions should ensure opportunities are taken to incorporate trees into developments and that existing trees are retained where possible.
- 4.20 Section 14 sets out the Government's policy position regarding flooding and climate change. Paragraph 154 requires new development to be planned to avoid increased vulnerability to a range of impacts arising from climate change.
- 4.21 Section 15 relates to the natural environment. Paragraph 180 requires local planning authorities to apply certain principles in order to safeguard biodiversity. It states that *"opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity"*.
- 4.22 Paragraph 183 requires that a site is suitable for its proposed use taking account of ground conditions and any risk arising from land instability and contamination.
- 4.23 Paragraph 185 requires new development to be appropriate for its location, taking into account the likely effects of pollution on health, living conditions and the natural environment as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. Development is thus required to mitigate and reduce the potential impacts resulting from noise, artificial lighting and odour.
- 4.24 Paragraph 186 confirms that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of air quality management areas (AQMA) and the cumulative impacts from individual sites in local areas. Planning decisions should ensure that any new development in an AQMA is consistent with the local air quality action plan.
- 4.25 Section 16 of the Framework seeks to conserve and enhance the historic environment. Paragraph 194 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

- 4.26 Paragraph 203 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 4.27 Paragraph 205 confirms that local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.
- 4.28 With regard to decision making generally, it is helpful to note paragraph 38 of the Framework. This states that “*Local Planning Authorities should approach decisions on proposed developments in a supportive and creative way. They should use the full range of planning tools available..... and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible*”.

Planning Practice Guidance

- 4.29 Planning Practice Guidance (PPG) is regularly updated and should be read in conjunction with the NPPF. It is a material consideration in the determination of the application, providing guidance on matters such as the sequential test, design, transport, the effective use of land, healthy and safe communities, noise, drainage, the natural environment and air quality.

DEVELOPMENT PLAN

Reading Local Plan (2019)

- 4.30 Policy CCI sets out the presumption in favour of sustainable development. It explains that a positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). Where appropriate, the Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible.
- 4.31 Policy CC2 relates to sustainable design and construction. Proposals for new development will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change. To meet these requirements, all minor non-residential

developments are required to meet the most up-to-date BREEAM 'Very Good' standard as a minimum.

- 4.32 Policy CC3 states that all developments will demonstrate how they have been designed to incorporate measures to adapt to climate change. Where possible, new buildings should be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements. Proposals should demonstrate how they have been designed to maximise resistance and resilience to climate change, and should use planting where appropriate as part of a landscape scheme. All development should minimise the impact of surface water run-off and, where possible, incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change.
- 4.33 Policy CC5 deals with waste minimisation and storage. Development should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings, and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate, well-designed spaces to facilitate waste storage, reuse, recycling and composting.
- 4.34 Policy CC6 relates to accessibility and the intensity of development. It states that the densest and largest scale of development will take place in the most accessible locations. Unless it can be demonstrated that the accessibility of a site is to be significantly upgraded, any new development must be at a scale, density and intensity appropriate to that level of accessibility.
- 4.35 Policy CC7 outlines the Council's approach to design and the public realm. All development must be of a high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. Proposals will be assessed to ensure that they make a positive contribution to character, continuity and enclosure, quality of the public realm, green infrastructure and landscaping, ease of movement and permeability, legibility, adaptability and diversity. Developments will also be assessed to ensure that they respond positively to their local context, create safe and accessible environments, address the needs of all in society and are visually attractive.
- 4.36 Policy CC8 seeks to safeguard amenity. It confirms that development will not cause a detrimental impact on the living environment of existing residential properties in terms of privacy and overlooking, access to daylight and sunlight, visual dominance and the overbearing effects of a development, harm to outlook, noise and disturbance, artificial lighting, vibration, dust and fumes, odour and crime and safety. Other aspects to which this Policy applies includes

matters such as hours of operation for a business and the effects of traffic movement on residential amenity.

- 4.37 Policy EN1 relates to the protection and enhancement of the historic environment. Historic features, areas of historic importance and other elements of the historic environment, including their settings, will be protected and where possible enhanced. All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits.
- 4.38 Policy EN4 deals with locally important heritage assets. It states that planning permission may be granted in cases where a proposal could result in harm to or the loss of a locally important heritage asset only where it can be demonstrated that the benefits of the development significantly outweigh the asset's significance. Where it is accepted by the Local Planning Authority that retention is not required, recording of the heritage asset should be undertaken and submitted alongside development proposals.
- 4.39 Policy EN12 sets out the Council's approach to biodiversity and the green network. Development should not result in a net loss of biodiversity and should provide a net gain for biodiversity wherever possible. Development should protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable. Development should also provide new tree planting, wildlife friendly landscaping and ecological enhancements wherever practicable.
- 4.40 Policy EN14 relates to trees, hedges and woodland. Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance. New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations.
- 4.41 Policy EN15 states that development should have regard to the need to improve air quality and reduce the effects of poor air quality. Development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated. The following will be taken into account:

- Whether the proposal, including when combined with the cumulative effect of other developments already permitted, would worsen air quality;
 - Whether the development is within, or is accessed via, an Air Quality Management Area; and
 - Whether it can be demonstrated that a local worsening in air quality that would not detrimentally affect human health or the environment would be offset by an overall improvement in air quality, for instance through a reduction in the need to travel.
- 4.42 Where required, planning obligations will be used to secure contributions to measures to tackle poor air quality or for air quality monitoring.
- 4.43 Policy EN16 deals with pollution and water resources. Development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution; where it would result in no deterioration in, or ideally enhance, ground and surface water quality and; where adequate water resources, sewerage and wastewater treatment infrastructure will be in place to support the proposed development prior to occupation. Development will only be permitted on land affected by contamination where it is demonstrated that the contamination can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site.
- 4.44 Policy EN17 outlines the Council's policy for noise generating equipment. Where noise generating equipment is proposed, the noise source specific level (plant noise level) should be at least 10dBA below the existing background level when measured at the nearest noise sensitive receptor.
- 4.45 Policy EN18 relates to flooding and sustainable drainage systems. Wherever possible, development should be designed to reduce flood risk, both on and off-site. Non-major development is encouraged to incorporate sustainable drainage systems (SuDS). Run-off rates should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site. Schemes should ensure that the movement of water does not worsen contamination effects.
- 4.46 Policy TRI relates to the Borough's transport strategy. 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, in accordance with any agreed transport assessment submitted as part of an application.

4.47 Policy TR3 addresses access, traffic and other highway related matters. In determining proposals involving a new or altered access onto the transport network or the generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment. Development will only be permitted where:

- Accesses and works to the highway comply with adopted standards;
- The development would not have a material detrimental impact on the functioning of the transport network;
- The proposal would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists;
- The proposal would not generate regular movement of heavy goods vehicles (HGVs) on unsuitable roads, or on roads without easy access to the Classified Highway Network; and
- For non-residential uses, off-street servicing would be provided.

4.48 Proposals involving either the construction of a new site access, or a material increase in the use of an existing site access, directly onto the Classified Highway Network will not be accepted if they would be likely to result in the encouragement of the use of the network for short local trips or compromise the safe movement and free flow of traffic on the network or the safe use of the road.

4.49 Policy TR4 confirms 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 will not detrimentally affect an identified cycle route.

4.50 Policy TR5 relates to car and cycle parking and electric vehicle charging. Development should provide car and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport. Within communal car parks for non-residential development of at least 10 spaces, 10% of spaces should provide an

active charging point. The Policy supporting text identifies that the Council has produced a Revised Parking Standards and Design Supplementary Planning Document (SPD) which sets out the Borough's car and cycle standards.

- 4.51 Policy RL1 sets out the hierarchy of centres in the Borough, and confirms that the vitality and viability of the centres should be maintained and enhanced.
- 4.52 Policy RL2 confirms that all development will comply with the relevant tests for retail, leisure and culture development, as set out in national policy.
- 4.53 Policy RL5 states that proposals which include more than 1,000 sq.m (gross) of new or additional floorspace for main town centre uses in an edge-of-centre or out-of-centre location should demonstrate that there will be no significant adverse impact on existing centres.
- 4.54 Policy RL6 deals with the protection of leisure facilities and pubs. It states that *"Existing leisure facilities or public houses will generally be retained, and there is a strong presumption in favour of retaining leisure facilities or public houses where they are the only facility of their type in a district, major local or local centre"*.
- 4.55 The policy goes on to set out the criteria that development is required to comply with to justify the loss of a leisure facility or public house. These are as follows:
- (a) *There is no need for this type of facility in this area; or*
 - (b) *The function of the facility can be adequately fulfilled by an existing facility, or a facility proposed as part of the development, where that facility would be at least as accessible to the same catchment; or*
 - (c) *Unless the site is a sports or recreation facility, the impacts on amenity of residents or on crime and security of retaining the facility could not be dealt with through other measures and would be so severe as to outweigh the benefits to the wider community of retaining the facility."*
- 4.56 Further guidance is provided by the supporting text. In relation to the loss of 'pub's, it is clear that underlying objective of the policy is to ensure that pubs are not loss from the heart of the community or where they are an important anchor use in a designated centre.

- 4.57 With regard to the tests that have to be satisfied in order to comply with the policy, it must be noted (having regard to the pre-app response) that the requirement is to meet either criterion (a) or (b) or (c) and not all three.
- 4.58 With regard to criterion (a), the supporting text explains that evidence to show that there is no need for the facility should be based on clear, long-term issues and trends, rather than short-term economic circumstances or lack of viability due to poor management. It goes on to state that “*retention of a facility where there is no need for it can result in long-term vacancy detracting from the centres vitality and viability or the quality of the area*”. The reference to the word ‘centre’ once again indicates that this policy is primarily aimed at community facilities within designated centres. It is also important to point out that contrary to comments within the Council’s pre-app response, the policy does not define long term vacancy nor does it require that the site is marketed for a period of less than 5 years in order to demonstrate compliance with criterion (a).
- 4.59 With regard to criterion (b), the supporting text states requires that any alternative facilities identified must fulfil a similar role, have sufficient capacity to adequately serve the existing catchment, and must be at least as accessible by public transport, foot and cycle to the majority of the catchment as the facility to be lost.

OTHER MATERIAL CONSIDERATIONS

Revised Parking Standards and Design SPD

- 4.60 The Council revised its Parking Standards and Design SPD in October 2011. The SPD does not outline car or cycle parking standards for drive thru retail / bakery units, but does confirm standards for restaurants / cafes. The application site is in the defined Secondary Core Area (Zone 3) and according to the SPD, restaurants / cafes should be served by:
- A maximum of one car parking space per 5 sq.m;
 - Two spaces or 4% of total car parking capacity, whichever is greater, to be reserved for disabled car parking;
 - A minimum of one cycle parking space per six staff; and
 - A minimum of one cycle parking space per 300 sq.m (GFA);
- 4.61 The SPD also provides guidance on the design of parking spaces including disabled bays.

Sustainable Design and Construction SPD

- 4.62 The Council adopted its Sustainable Design and Construction SPD in December 2019. The SPD reports that the Council has declared a Climate Emergency and is committed to working to achieve a carbon neutral Reading by 2030. The SPD is a material consideration in the determination of the application and supplements Policies CC2, CC3, CC5 and EN18 of the Reading Local Plan.

5 PRINCIPLE OF DEVELOPMENT

- 5.1 In this section of the report, we considered the principle of the redevelopment of the site having regard to relevant planning policy and guidance. Specifically, we consider the principle of the loss of the existing use, the principle of the demolition of the buildings that currently occupy the site and finally, the principle of the redevelopment of the site for a Greggs retail bakery unit with drive thru.

LOSS OF THE EXISTING USE

- 5.2 The site currently comprises the George and Dragon amenity pub/ restaurant with its associated car park and outdoor seating area. The premises were closed in March 2020 at the start of the Covid19 pandemic and have never reopened since.
- 5.3 At the time of its closure, the premises were trading under the Hungry Horse brand which is best described as family friendly destinational amenity pub / restaurant. The focus of Hungry Horses premises is food and a family friendly dining experience and not the consumption of alcohol.
- 5.4 The premises have traded under this brand since Greene King's acquisition of the premises in 1999. Before this the site was part of Morland and traded as a 'Morland Family and Friends'.
- 5.5 Prior to the onset of Covid, trading at the premises had been in decline for many years. The George and Dragon was not trading viably and it was not a sustainable business proposition. The premises had already been identified for closure by the applicant and the only reason it had not been closed was because at the time it was more cost effective to trade the premises at a loss than manage a closed site with all the security risks and issues that come with this. The Covid pandemic thus simply brought what was an eventuality.
- 5.6 The Viability Study prepared by Savills which accompanies this application provides detailed information on the George and Dragon operation and a helpful, clear and independent insight into why the premises were failing, which is for a number of reasons related to the physical and locational characteristics of the site; local competition; local demographics and trading costs.
- 5.7 The report also includes a CAMRA Viability Test which the George and Dragon fundamentally fails and which reinforces the evidence within the report that the site and premises are unlikely to ever support and sustain a viable pub/ restaurant business in modern times. It is for this

reason that it is proposed that the premises be demolished and the site redevelopment for an alternative use.

- 5.8 It is our professional opinion that the Hungry Horse operation that has been trading in the premises since the applicant acquired the premises in 1999 is not a public house / drinking establishment and thus a Sui Generis use. Such premises would in our view consist of an operation where there is either no sale of food (i.e. a drinking establishment) or the sale of food forms a limited part of the operation (i.e. a drinking establishment with expanded food).
- 5.9 In this case, the primary function for the premises and purpose for people visiting was the consumption of food. This was self-evident from the interior of the premises which was laid out almost entirely for dining with tables and chairs and cutlery and condiments on tables. The premises also had a very extensive menu comprising of starters, mains and deserts and offered food throughout the day rather than at limited times. The premises employed a team of staff whose sole roles were to serve food and wait tables and the premises have large commercial kitchen.
- 5.10 Accordingly, it is our firm view that the established and extant use of the George and Dragon is Class E (whereby the premises are operating for the sale of food and drink principally to visiting members of the public where consumption of that food is mostly undertaken on the premises).
- 5.11 Having regard to this fact and notwithstanding pre-application advice from the Council, it is our professional view that Policy RL6 of the Local Plan is not applicable to this scheme since it seeks to retain and guard against the loss of public houses and thus something which the George and Dragon is not.
- 5.12 Therefore, in the absence of any policy protection for the existing premises, it is considered that the loss of the existing use is entirely acceptable and appropriate in this case and that there are no valid or reasonable planning grounds for planning permission being refused for the proposed development on the grounds of the loss of the existing use.
- 5.13 Notwithstanding this fact, in the event that the Council disagree with this position, which pre-application advice incorrectly suggest they do, the proposed development satisfies and accords with the requirements of Policy RL6 in any event as is demonstrated below and by reference to the Viability Study prepared by Savills which accompanies this application.

- 5.14 Looking firstly at the first part of the policy. This states that existing public houses will generally be retained. The inclusion of the word ‘*generally*’ is very important and makes it clear that Policy RL6 does not prohibit the loss of public houses. By default, this means that there is acceptance within the wording of the policy that the loss of public houses will be acceptable in some circumstances.
- 5.15 The policy then goes on to state that “*there is a strong presumption in favour of retaining leisure facilities or public houses where they are the only facility of their type in a district, major local or local centre*”. Again the use of the word presumption makes it clear to the reader that the loss of public houses is not precluded by the policy and that there may be circumstances where the loss is both appropriate and acceptable. We suggest to the Council that this site is a case in point.
- 5.16 What is also clear is that the strong presumption in favour of retention applies to public houses that are the only facility within a designated centre. The supporting text to the policy provides more guidance on this matter and is explicit that this is where the premises are an important anchor use. This makes logical sense and fits with the national objective to protect community pubs where they are the last remaining local facility.
- 5.17 However, in this case, the premises are not within a district, major local or local centre and they are not an anchor use. Rather they occupy a prominent main road site in a predominantly residential area not connected to any designated centre other commercial uses.
- 5.18 As is set out in the Viability Study the George and Dragon is also one of many establishments serving the local area. The loss of the premises (which has already occurred as a result of the premises closure in any event) will thus not result in the locality being left without any public house provision. On the contrary, there are 13 other premises with a 2.1 mile radius of the site that will meet the communities needs with regard to public house provision.
- 5.19 Policy RL6 then goes on to set out the criteria that need to be met in order for the loss of a public house to be acceptable and accord with the policy. It is important to note that contrary to the Council’s pre-application advice that to accord with the policy it is not necessary to comply with all three criteria but rather criteria (a) or (b) or (c) i.e. only one of them.
- 5.20 Looking firstly at criteria (a), the supporting text to the policy explains that the loss of a public houses can be justified, and redevelopment considered to accord with Policy RL6 where it can be demonstrated that there is no need for this type of facility within the area. Further

clarification is provided by the supporting text which explains that evidence should show that there is no need for the facility “*based on clear, long-term issues and trends, rather than short-term economic circumstances or lack of viability due to poor management*”.

- 5.21 The George and Dragon shut its doors in March 2020, at the start of the Covid-19 pandemic and whilst the pandemic undoubtedly hastened its demise, the premises had already been earmarked for closure by Greene King as a result of longstanding poor and declining trading going back many years. Information contained within the Viability Study gives a flavour of the trading pattern of the premises since 2016 and clearly shows the premises in decline and that they were not a viable and sustainable business proposition.
- 5.22 This information, and alongside other commentary, within the Viability Study also shows that the George and Dragon was not attractive option for people seeking amenity pub/ dining facilities in the local area and potential customers were clearly going elsewhere. Indeed, the Viability Study shows that there is a wide range of alternative options for pub/ dining in the local area, most of which offer a more attractive environment and superior facilities to the George and Dragon. Given the highly competitive nature of the amenity pub/ restaurant market it is not surprising that the community was taking its custom elsewhere.
- 5.23 It is worth making the point at this juncture, that just because the premises were trading pre-Covid, this does not indicate that they were a viable and sustainable business. In our experience there is a misconception that if a premises is trading, it must be viable, and this is simply not the case. In most cases, premises continue to trade unviably for a period until such time as they are either sold, put to an alternative use or are closed due to lack of market interest and /or an alternative use not being found. This is because in many cases trading premises at a loss loses the business less money that if the site is permanently closed and boarded up. This is due to the substantial costs of having a site closed.
- 5.24 The information set out above together with the contents of the Viability Study clearly demonstrate that there is no need for the premises and therefore that criteria (a) of Policy RL6 has been met. Accordingly, whilst it is our firm view that Policy RL6 is not applicable to this scheme on account of the established use of the premises being Class E (and not a public house), we are of the view that compliance with Policy RL6 has been demonstrated in any event.

- 5.25 Aside from the comments above, whilst there is no stated policy requirement that the premises be marketed for a period of time in order to demonstrate a lack of need for the use, the applicant has actively marketed the premises for sale and let for approaching 4 years. Full details of the marketing and interest in the premises is set out within the Viability Study.
- 5.26 This shows that there has been no serious or realistic interest in the site for the retention of the existing use and buildings. Interest in the site has overwhelmingly been for the demolition of the existing buildings and redevelopment of the site for an alternative use. Whilst there was one freehold offer from a developer for a pub operator, the offer was not acceptable and was materially less than Market Value. This is despite a relatively buoyant pub market and activity in the area.
- 5.27 This lack of interest clearly demonstrates that the site and premises are not attractive to the pub industry and that the site, premises, its location and physical characteristic do not meet modern day pub operator requirements. In addition, it is very apparent from the Viability Study that the capital costs of renovating and refurbishing the premises to bring them back into an active pub use and the likely return on investment, make renovation and refurbishment of the premises an unattractive and unviable business proposition. As such, it is reasonable to conclude that even if planning permission were refused for this development, it is highly unlikely that the premises will ever be brought back into use as a public house or amenity pub/ restaurant.
- 5.28 Turning next to criteria (b), the policy is also satisfied if it can be demonstrated that the function of the facility can be adequately fulfilled by an existing facility, where that facility would be at least as accessible to the same catchment. The supporting text to Policy RL6 explains that any alternative facilities must fulfil a similar role, have sufficient capacity to adequately serve the existing catchment area, and must be at least as accessible by public transport, foot and bicycle to the majority of the catchment area as the facility to be lost.
- 5.29 As is robustly demonstrated within the Viability Study, there are 13 other similar facilities within 2.1 miles of the application site which serve the community which is local to the George and Dragon and thus there are a large number of alternative premises. For the nearest six alternative facilities, we provide a description of their role and level of accessibility to the catchment area of the George and Dragon, at **Table I** below.

Alternative Facility	Role	Distance from the George and Dragon	Accessibility to the George and Dragon Catchment Area
<i>Cunning Man, Burghfield Bridge, RG30 3RB</i>	Pub / restaurant	1.1 miles	The Cunning Man can be accessed from the catchment area of the George and Dragon via a short drive along Burghfield Road. Similar to the George and Dragon, there are two bus stops immediately adjacent to the Cunning Man which provide regular services (2 and 2a) into and out of the catchment area.
<i>Southcote Beefeater, Bath Road, RG30 3AB</i>	Pub / restaurant	1.2 miles	Southcote Beefeater is on the same road as the George and Dragon (Bath Road). It can be accessed on foot or by cycle from the catchment area of the George and Dragon. There are five bus stops within 150m of the facility, providing regular services (1, 2, 2a, 26) into and out of the catchment area.
<i>The Prince, School Road, RG31 5BQ</i>	Pub with an expanded food offer	1.5 miles	The Prince is in Tilehurst District Centre. It is a 5 minute off-peak drive from the George and Dragon, and can be accessed from its catchment area via footpaths and cycle routes. There are three bus stops within 140m of The Prince, providing regular services (15, 15a and 33) into and out of the catchment area.
<i>Mansion House, Liebenrood Road, RG30 2ND</i>	Restaurant	1.5 miles (800m as the crow flies)	Mansion House is an 18 minute walk from the George and Dragon. It can be accessed from the George and Dragon catchment area by dedicated cycle lanes on Bath Road and Honey End Lane, or by foot, and it provides on-site car parking.

<i>The Plough, School Road, RG31 5AW</i>	Pub with an expanded food offer	1.6 miles	The Plough is in Tilehurst District Centre. It is a 5 minute off-peak drive from the George and Dragon, and can be accessed from its catchment area via footpaths and cycle routes. There are three bus stops within 140m of The Plough, providing regular services (15, 15a and 33) into and out of the catchment area.
<i>Foresters Arms, Brunswick Street, RG1 6NY</i>	Pub with an expanded food offer	1.7 miles	The Foresters Arms is situated just off Bath Road, on Brunswick Street. There are four bus stops within 250m of the Foresters Arms, providing regular services (1, 2, 2a, 15, 15a and 33) into and out of the George and Dragon catchment area. The Foresters Arms is a 5 minute off-peak drive and a 10 minute cycle ride from the George and Dragon.

Table 1

- 5.30 A map and list of the 13 identified facilities is contained at **Appendix 1**.
- 5.31 Having regard to the submitted Viability Study and the information provided at **Table 1**, it is very clear that there are a plethora of similar alternative facilities within the local area and same catchment as the George and Dragon that fulfil the same function. Accordingly, criteria (b) of Policy RL6 of the adopted Local Plan has also been satisfied.

Summary on Loss of the Existing Use

- 5.32 For the reasons stated above, the George and Dragon is not a pub in the traditional sense and cannot be regarded as a “*drinking establishment*” or a “*drinking establishment with an expanded food offer*”. Rather the existing and extant operation falls within Class E, with the premises consisting of an operation “*for the sale of food and drink principally to visiting members of the public where consumption of that food is mostly undertaken on the premises*”. Accordingly, contrary to advice contained within the Council’s pre-app response, we are of the firm view that Policy RL6 is not relevant or applicable to the application scheme.

- 5.33 Notwithstanding this fact, we have demonstrated that if the Council disagree with this position, the application scheme fully complies with Policy RL6 in any event.
- 5.34 It is clear from the wording of Policy RL6 that it does not preclude or prohibit the loss of existing leisure and public house uses and that there is a presumption in favour of their retention where the premises that are to be lost are located within a district, major local or local centre and the premises are an anchor use within that centre. The application site is not in a designated centre nor is it an anchor use. As such, there is no presumption in favour of the retention of the premises.
- 5.35 Turning to the criteria within the policy, in order for development to accord and comply with Policy RL6, it is necessary only to satisfy one of the three tests/ criteria. In this case, the application submission demonstrates that the scheme accords with two of the criteria, both (a) and (b).
- 5.36 Accordingly, the applicant has robustly demonstrated that the loss of the existing use of the site is both appropriate and acceptable and that the proposed development complies in full with Policy RL6. We therefore find no valid or reasonable planning grounds for objection being raised to the loss of the existing use of the site or for planning permission being refused on this basis. To do so would be unjustifiable and without basis.

LOSS OF THE EXISTING BUILDING

- 5.37 The George and Dragon is a part single-storey, part two-storey building comprising mainly red brick with slate and red tile roof coverings. The building is not statutorily or locally listed and is not within or adjacent to a conservation area. The building also does not feature on the Berkshire Historic Environment Record. However, in pre-application advice the Council state that they consider the building a non-designated heritage asset.
- 5.38 Paragraph 203 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining a planning application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 5.39 Policy EN1 of the Local Plan confirms that the loss of a heritage asset will require clear and convincing justification, usually in the form of public benefits. Policy EN4, which relates specifically to locally important heritage assets states that planning permission may be granted

for the loss of such an asset, but only where it can be demonstrated that the benefits of the development significantly outweigh the asset's significance.

- 5.40 In accordance with paragraph 194 of the NPPF, the submitted Heritage Statement and Building Recording prepared by Wardell Armstrong provides a proportionate assessment of the significance of the George and Dragon to allow the impacts of the proposal on any heritage significance it holds to be assessed. In line with Policy EN4 of the Local Plan and paragraph 205 of the NPPF, the Statement also contains a historic building recording (equivalent to Historic England Level 2).

Historic Development

- 5.41 According to the Heritage Statement, the Tilehurst Parish Tithe Survey of 1843 depicts a complex of buildings on the site, reported to comprise two tenements and gardens. The George and Dragon was first depicted on the 1878 Ordnance Survey, with the function of the building being recorded as a beer house (hereafter referred to as the main building). By 1912, a detached L-shaped structure had been built to the east of the main building and various other alterations to the site's built form ensued following this. The George and Dragon was one of several beer houses within the parish of Tilehurst.
- 5.42 Of the current built form on the site, it is the main building, which is the existing two-storey element fronting Bath Road, and the two-storey L-shaped structure, which has the red tile roof, which comprise the earliest recorded phases of historic development on the site. A phase of significant building expansion occurred during the late 20th Century when the detached L-shaped structure was subsumed into the main building through extension. Modern extensions to the north and west have also occurred alongside the creation of two porches.

Significance

- 5.43 The supporting Heritage Statement provides an assessment of the significance of the George and Dragon, in line with the NPPF and Historic England good practice guidance.
- 5.44 The building is assessed as being of negligible to low aesthetic value, due to previous alterations and extensions. The extensive additions to the complex have diluted the intent of the two-storey beer house fronting Bath Road, and any aesthetic value possessed by the L-shaped structure has been encapsulated by unsympathetic modern additions. The aesthetic value of the interior of the building is also reported to lack any historic integrity, with finishes, fixtures and fittings being modern.

- 5.45 The Heritage Statement also reports that the building has low historical and evidential value with its limited value deriving from the remaining physical fabric of the main building, which evidences its origins as a late 19th Century beer house. Despite its original central door opening being infilled, the southern elevation to Bath Road is considered to retain a degree of historic integrity offering original brickwork, fenestration and simple detailing such as quoins, window heads and sills. The siting of the main building and the arrangement of the southern elevation also demonstrates the original design intention for a principal public frontage to Bath Road.
- 5.46 The first floor accommodation in the main building is also considered to hold some limited historical and evidential value. This is derived from evidence of the original floor plan, chimney breasts and fire surrounds which provide an understanding of the historic function of rooms on the upper floor and as residential accommodation.
- 5.47 In terms of communal value, the George and Dragon is considered to hold some value related to personal memories and experiences at the building, but this is very limited. The presence of the building on Bath Road may also contribute to collective memories of the local area. That being said, the premises had primarily functioned as an amenity pub / restaurant for many years and this will have lessened the communities appreciation of the building and its role within it. Accordingly, the building has been assessed to have a low communal value.
- 5.48 Based on a very detailed assessment of the significance of the George and Dragon, the Heritage Statement concludes that its overall heritage significance is very low. The elements of the site which are considered to hold value are limited to the remains of the main building, notably its southern elevation and first floor, and to a lesser extent, the remaining fabric associated with the L-shaped structure. The contribution made by the setting of the George and Dragon to its significance is also very limited and derives solely from its relationship with Bath Road.

Impact

- 5.49 The proposed development will result in the total loss of the George and Dragon, as a consequence of its proposed demolition to enable the site to be redeveloped. The level of harm to its overall significance is therefore considered to be substantial.
- 5.50 However, applying paragraph 203 of the NPPF it is necessary to take a balanced judgement which evaluates and balances the harm and loss, having regard to the building's significance, with the public benefits of the scheme. This approach is reinforced by Policy EN1 and EN4

of the Local Plan which does not preclude demolition of locally important heritage assets where the benefits outweigh the harm and the building is subject to recording.

Assessment

- 5.51 Having regard to the information contained in the Heritage Statement, it is clear that the George and Dragon is of very limited heritage significance. This is important for the purposes of balancing the harm that results as a consequence of the loss of the building with the public benefits that arise from the replacement scheme.
- 5.52 The George and Dragon is a much-altered building within a much-altered context, possessing negligible to low aesthetic value. Whilst it is acknowledged that the southern elevation of the main building retains a degree of historic integrity which contributes to its evidential and historical value, it too has been significantly altered by way of replacement windows to its ground floor and the removal of the original door opening.
- 5.53 More generally, the building is architecturally unremarkable with no technical innovation or excellence within its construction, and due to its extent of previous alteration, it is not a representative example of a traditional roadside public house.
- 5.54 The Heritage Statement reveals that the George and Dragon was historically one of several beer houses within the parish of Tilehurst and hence it cannot be regarded as an uncommon building type. Furthermore, any communal value associated with the historical use of the building as a beer house has been diminished due to its modern primary function as an amenity pub / restaurant i.e. a premises for eating rather than a drinking establishment / traditional public house.
- 5.55 Having regard to this information, it is reasonable to conclude that whilst the demolition of the building will give rise to some harm, the harm is very limited due to the building being of limited heritage significance.
- 5.56 Consideration should at this point be given to the potential for the building to be reused for its extant use as this is a material planning consideration that should rightly be taken into consideration as part of any balancing of the harm that would arise from the loss of the building with the public benefits of the scheme.

- 5.57 Having regard to the accompanying Viability Study prepared by Savills, it is clear that the building does not have a future as a public house, and it is extremely unlikely that it will ever be brought back into an active pub use. There are a variety of reasons for this including, the absence of any interest from the market to re-establish the building's extant use; the fact that the use of the premises as a public house is simply not a viable and sustainable business proposition; the site does not have the physical and locational characteristics required for a successful modern pub operation and there is significant competition from other premises in the locality. It should also be noted that the premises entirely fail the CAMRA Viability Test.
- 5.58 It is also relevant and important to draw attention to the fact that the Viability Study shows that there has been next to no interest from the market in the retention of the existing building and its conversion to an alternative use. As such, if planning permission were refused for this scheme and demolition of the building, it seems almost certain that the premises will simply stand vacant and unused and that the site will become derelict.
- 5.59 This fallback position is relevant, important and should not be ignored. It also adds further weight to a case that the harm arising from the demolition of the George and Dragon is limited and is significantly and demonstrably outweighed by the public benefits of the scheme.
- 5.60 The public benefits of the scheme are wide ranging and can be summarised as follows:
- Regeneration of previously developed land in a prominent, sustainable and accessible location, bringing a vacant and unused parcel of land back into a meaningful economic use. As is set out above, were planning permission not to be granted for this scheme, the site would almost certainly sit unused and become derelict.
 - New food and drink facilities for the benefit of the community and passing road users and specifically, in demand 'food-on-the-go' premises for the benefit of passing road users.
 - Widening consumer choice within the area and creating healthy competition between similar roadside facilities.
 - Creation of at least 20 new jobs for local people, in addition to jobs during the construction phase and in the supply chain.

- Increased consumer spending within the local area and additional income from business rates as a result of the site being brought back into an active commercial use.
- Improvements to the visual amenities of the locality as a result of the removal of an unattractive and derelict site. The building is falling into disrepair and as it represents a security risk has to be hoarded. This results in the site appearing unsightly in the street scene and detrimental to the amenities of the area. Redevelopment of the site with an attractive high quality modern building will improve the appearance of the site and visual amenities of the locality. It will also address the present security risks.
- Provision of 10 EV charging points, comprising a mix of AC and DC provision, providing substantial new electric vehicle charging provision in the area and on a key arterial and commuter route into Reading.
- Improvement to the surface water drainage regime on the site, utilising infiltration to deal with the disposal of surface water and improving pollution control measures.
- Introduction of a high-quality landscaping scheme which retains and enhances existing vegetation and trees where possible and will deliver 77.41% biodiversity net gain through the provision of new on-site landscaping, bird and bats boxes and other infrastructure to support ecology.
- Construction of a building which is of a sustainable design and construction, responds to climate change, minimises wastes, reduces CO2 emissions and is located in an accessible location.
- Improvements to means of access to the site through the introduction of 'Keep Clear' road markings and extension of the right turn lane which will improve traffic flows along Bath Road.

Conclusion

- 5.61 The application submission demonstrates that the George and Dragon has limited heritage significance and that it is highly unlikely that the building will be brought back into an active use either as public house or an alternative use.

- 5.62 Were this scheme not to receive planning permission then the site would lay vacant and unused with the building rapidly becoming more derelict. This adds further weight to an argument that planning permission should be granted for the demolition of the building.
- 5.63 Planning policy does not preclude the demolition of a non-designated heritage asset and the bar / threshold test for demolition to be acceptable is much lower for a non-designated heritage asset than a designated one. It is also relevant and material to the Council's consideration of this matter, that in the case of the George and Dragon, the building is not within a conservation area nor is it on the Berkshire Environment Record. It is also not on the Council's Local List of Locally Important Buildings.
- 5.64 In addition, it should be noted that were the building not a public house, planning permission would not be required to demolish the building and it is a quirk of the system that all premises that fall within the umbrella term 'public house', including amenity pub / restaurants such as this, are subject to a requirement that planning permission be granted for their demolition.
- 5.65 It was not the original intention of the legislation to protect amenity pub / restaurants and destination establishments such as this, rather it was intended to protect traditional public houses/ drinking establishments, particularly those in the heart of communities. The George and Dragon is not the type of premises which the legislation intended be protected, which adds further to the planning case for the demolition of the building and redevelopment for the site.
- 5.66 With regard to applicable policy, this consists of paragraph 203 of the NPPF and Policy EN1 and EN4 of the adopted Reading Local Plan.
- 5.67 Turning firstly to national policy contained at paragraph 203 of the NPPF, this requires that a balanced judgement is taken having regard to the scale of harm or loss and the significance of the heritage asset. It is also important to note that national policy does not set out a requirement to balance harm / loss with public benefits.
- 5.68 In the case of the George and Dragon, the scheme will result in total loss of the building. However, the Heritage Statement demonstrates that the building is of low heritage significance and therefore the harm resulting from the loss of the building is very limited and restricted to the local area. The development proposals are thus considered to accord with paragraph 203 of the NPPF.

- 5.69 With regard to Policy EN1, this requires that where a development proposal will harm or result in the loss of a heritage asset, a clear and convincing justification is provided, usually in the form of public benefits. In the case of the George and Dragon, the application submission provides a robust and detailed explanation as to why the site needs to be redeveloped and why the existing buildings need to be demolished.
- 5.70 As required by Policy EN1, this Planning Statement also sets out the public benefits of the scheme which are significant and wide ranging. In addition, it sets out the implications of planning permission not being granted for the demolition of the George and Dragon. The application scheme is considered to satisfy the policy tests of Policy EN1 and thus to accord with it.
- 5.71 In terms of Policy EN4, it is in our view questionable as to whether this policy applies, as the George and Dragon is not included on the Council's list of Locally Important Buildings and Policy EN4 is explicit that it applies to buildings on the list. However, it is considered that the scheme complies with Policy EN4 in any event as it has been demonstrated that the benefits of the scheme significantly and demonstrably outweigh the harm to the asset, which has been assessed as being of low and limited significance. Furthermore, as required by Policy EN4, the application is accompanied by a Level 2 Historic Buildings Recording of the George and Dragon
- 5.72 It is on this basis that we conclude that demolition of the existing buildings is acceptable and that there are no valid planning grounds for refusing planning permission for the proposed development on grounds that it will result in the loss of the existing building.

DRIVE THRU RETAIL / BAKERY

- 5.73 According to Annex 2 of the NPPF, retail (including bakeries) and drive thru's are defined as main town centre uses. The proposed drive thru is therefore a main town centre use.
- 5.74 The application site is out-of-centre in policy terms and is not allocated for the proposed use in the Development Plan. The nearest designated centres to the site are Coronation Square Local Centre (around 800m from the site) and Meadway District Centre (around 900m to the north).
- 5.75 Paragraph 87 of the NPPF requires local authorities to apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in

accordance with an up-to-date plan. This requirement is also set out in Policy RL2 of the Local Plan.

- 5.76 In accordance with the Development Plan and the NPPF, the application is supported by a separate Sequential Assessment prepared by Walsingham Planning. The Assessment considers the availability, suitability and viability of sequentially preferable sites within and on the edge of Coronation Square Local Centre and Meadway District Centre.
- 5.77 Notwithstanding the fact that a site in either of these locations would be contrary to Greggs' operational requirements, the Sequential Assessment concludes that there are no available, suitable and viable sites for the proposal within or on the edge of the identified centres.
- 5.78 Consequently, we consider that the application satisfies the sequential test and complies with Policy RL2 of the Local Plan, together with government guidance contained in the NPPF.
- 5.79 In this case, there is no requirement to undertake an Impact Assessment. This is because the proposed floor area to be provided by the drive thru retail / bakery unit is significantly below the locally adopted threshold set out by Policy RL5 of the Local Plan (1,000 sq.m GEA).
- 5.80 The fact that the proposed unit will be substantially below this threshold indicates that the scheme will have little if any adverse impact on the vitality and viability of any nearby centre and certainly not a significant impact. Notwithstanding this fact, the proposal is intended to provide a 'food-on-the-go' offer specifically for the benefit of road users on Bath Road, and therefore is not expected to draw any trade from the surrounding local centres.
- 5.81 Paragraph 88 of the NPPF explains that when considering out-of-centre proposals, preference should be given to accessible sites which are well connected to the town centre.
- 5.82 Bath Road is a key arterial transport route connecting Reading Town Centre to Junction 12 of the M4. As set out in the supporting Transport Assessment and Sequential Assessment, the site is accessible by bus, bicycle and by foot. It is in close proximity to two bus stops, which provide regular services to Newbury and Reading Town Centre, and the opposite side of Bath Road has a dedicated bus and cycle lane. Coronation Square Local Centre, which is around 800m from the site, can be accessed via pavements, and Meadway District Centre, which is around 900m from the site, can be accessed via pavements and cycle lanes.
- 5.83 The application site is thus considered to be accessible and well connected to the nearest designated centres, in accordance with paragraph 88 of the NPPF.

- 5.84 Having regard to the above, it has been demonstrated that the application scheme satisfies the sequential test and that the site an appropriate and acceptable location for the proposed use. It has also been shown that the application scheme accords with Policy RL1, RL2, RL5 and RL6 of the adopted development plan together with paragraphs 87 and 88 of the NPPF.

6 OTHER MATERIAL PLANNING CONSIDERATIONS

- 6.1 The application scheme raises a number of detailed planning/ technical issues. These include the following: design: access, access and parking; impact on residential amenity; impact on trees; landscaping and biodiversity net gain; ecology; air quality; ground conditions; drainage and flooding and sustainability matters.

DESIGN

- 6.2 Providing a well-designed scheme that responds to users' needs and the character of the area has been a key objective for the applicant from the outset.
- 6.3 The NPPF places significant weight on achieving well-designed places, as set out in Section 12 of the document. Paragraph 126 explains that good design is a key part of sustainable development and should contribute positively to making places better for people. The proposal achieves this objective since it has undergone a robust design process including pre-application engagement with the Council, and is of a good design incorporating high quality materials.
- 6.4 Paragraph 130 of the Framework explains that planning decisions should ensure that developments function well and add to the overall quality of an area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character; establish a strong sense of place to create an attractive development; optimise the potential of the site; and create a safe, inclusive and accessible development.
- 6.5 The proposal complies with all of the aforementioned criteria. It has been designed to meet the requirements of Greggs and its customers and will thus function well. The proposed development will improve the appearance of the site and will contribute positively to the quality and visual amenities of the area. The building will be of an appropriate scale and height and in keeping with the scale of the surrounding properties.
- 6.6 The building will have a hipped roof and will be finished in part with red brick, akin to elements of the existing building on site and the surrounding properties. The building will follow architectural cues from the surrounding area and will be sympathetic to its character. It will accord with the local vernacular and, unlike an earlier proposal which was explored with the Council during pre-application discussions, the premises will not be 'boxy'.

- 6.7 The proposal will contribute to the establishment of a strong sense of place. The scheme will be laid out in an efficient, accessible and legible manner, and will have a strong identity whilst assimilating well with its surroundings. The mix of materials and colours for the building, in addition to the arrangement of the canopy around its eastern and southern elevations, will provide visual interest.
- 6.8 The proposal will incorporate a comprehensive scheme of soft landscaping, including trees along the site's frontage to Bath Road. The type and location of the proposed trees, plants and shrubs will contribute, in an effective manner, towards the creation of an attractive development whilst providing other wide-ranging amenity and ecological benefits.
- 6.9 Inclusive access will be achieved by way of an automated entrance door for the building, disabled bays, tactile paving, defined crossing points and an easy-to-navigate site layout. The development will comprise a suitable level of external lighting alongside CCTV and safe access points, and will be accessible by car, bicycle and on foot, as noted. The proposal will therefore represent a safe, inclusive and accessible development.
- 6.10 Overall, it is considered that the proposed development is of a high-quality design and appropriate for the site and locality. As such, it is considered to accords fully with the criteria at paragraph 130 of the NPPF, together Policy CC7 of the adopted Local Plan.

ACCESS, HIGHWAYS AND PARKING

- 6.11 The planning application is accompanied by a Transport Assessment prepared by RGP. This outlines the accessibility credentials of the site and considers the traffic-related impacts of the proposal on the highway network.
- 6.12 Whilst the proposal is principally orientated around car travel, the site is reasonably accessible by modes of public transport.
- 6.13 The site is served by a nearby west-bound bus stop on the opposite side of Bath Road, which provides regular services to Newbury. An east-bound bus stop is around 125m to the east of the site, and this provides frequent services to Reading Town Centre. The closest railway station to the site is Reading West Station, located approximately 3.5km to the north west, accessible by a cycle ride or bus journey. The station provides regular rail services to Newbury and Basingstoke.

- 6.14 The pavement directly outside the site is very wide and is designed to accommodate pedestrians and cyclists. A new pedestrian link from Bath Road through the site will connect the footway with the drive thru unit. On the opposite side of Bath Road, the highway has a dedicated bus and cycle lane. Further afield, cycle lanes are situated on Honey End Lane and Hogarth Road, providing links to the surrounding areas.
- 6.15 The existing vehicular access to the site will be widened on one side, and a section of tactile paving on the public footpath will be altered. These alterations are required to enable safe two-way vehicular movements for cars and service vehicles. The altered vehicular access, as proposed, will provide the necessary visibility splay (2.4m x 43m) consummate for the 30mph speed limit on Bath Road.
- 6.16 The right-turn lane on Bath Road will be lengthened to accommodate the traffic flows associated with the proposal. 'Keep Clear' markings will also be provided on the eastbound side of Bath Road to discourage any blocking of the site access.
- 6.17 Given the nature and location of the development, a significant number of trips, particularly at peak times, will be drawn from vehicle movements already routeing along the highway network. As discussed, and agreed with the Highway Authority during pre-application discussions and accepted by other local planning authority's 80% of vehicular trips to the development are likely to be 'diverted' with the remaining 20% 'new' trips on the network.
- 6.18 It is on this basis that the Transport Assessment concludes that the development is likely to generate a maximum of 4 new trips in the AM weekday peak and 11 new trips in PM weekday peak. This equates to a 0.2% and 0.6% increase in baseline traffic on Bath Road during each weekday peak hour. During the weekend peak, it is anticipated that the development will generate a maximum of 23 new trips.
- 6.19 In neither case is the increase in traffic considered significant nor is it considered that the development will have an unacceptable impact on highway safety. Having regard to the level of additional traffic generated, the Transport Assessment concludes that the development will not result in cumulative impacts on the road network that are severe. The proposed development is therefore considered acceptable from a traffic impact perspective and compliant with relevant government guidance contained in paragraph 111 of the NPPF.

- 6.20 In line with pre-application advice provided by the Council in September 2022, the Transport Assessment provides a full analysis of the proposed access arrangements in the context of Bath Road and its existing traffic conditions.
- 6.21 The Assessment concludes that a sufficient number of natural 'gaps' in eastbound traffic on Bath Road will be available for vehicles to turn into and out of the site. The right-turn lane on Bath Road, in its lengthened form, will also provide sufficient capacity for right-turn movements into the site. The proposed 'Keep Clear' markings will have a negligible impact on traffic queueing conditions between the Bath Road / Hogarth Avenue and Bath Road / Burghfield Road junctions but will enhance the operational fluidity of the site's access arrangements.
- 6.22 The Assessment also concludes that the length / capacity of the drive-thru lane will be more than sufficient based on the forecasted demands of the drive thru at peak times. Queueing will be contained within the lane itself, with spare capacity available within the car park to accommodate any short-term peaks in demand.
- 6.23 In terms of servicing, deliveries will take place at off-peak hours during the developments opening times (5am to 11pm on Mondays to Sundays). Delivery activities will occur within the car park and in order to achieve this, six parking spaces will be suspended to allow for the service vehicle to manoeuvre and park. Deliveries will be planned for a specific time slot and staff will be made aware of this in advance in order to cordon-off the necessary parking spaces. This is not an uncommon servicing procedure for drive thru retail / bakery units. Separate to this, refuse is expected to be collected from the site by a private contractor approximately three times a week, outside of peak hours.
- 6.24 The submitted Transport Assessment contains a swept path analysis which demonstrates that a 10m rigid delivery / refuse collection vehicle will be capable of entering and exiting the site in a safe and convenient manner. The Assessment also contains a swept path analysis of the drive thru lane which demonstrates that a standard car will be able to enter, navigate and exit the lane in a satisfactory manner.
- 6.25 With regard to car parking provision, the development will provide 33 car parking spaces, including two disabled bays, two waiting bays and 10 EV charging spaces. The Council's adopted parking standards does not contain a standard for drive thrus, however through pre-application discussions with the Highway Authority it has been agreed that the development aligns with a Class A3 unit and thus that it is appropriate to apply this standard.

- 6.26 Based on a floor area of 186 sq. m, the development is required to provide a maximum of 37 car parking spaces. The submitted scheme proposes 33 spaces, including 2 disabled spaces. Given the drive thru nature of the use and the fact that the Council's standard is a maximum not minimum it is considered that 33 spaces is entirely appropriate and acceptable.
- 6.27 Notwithstanding this fact, in order to justify the proposed level of provision and as requested by the Highway Authority in their pre-application advice note, the Transport Assessment includes a car parking accumulation exercise. This shows a maximum demand for car parking at the site of just 7 spaces during the weekday peak period and 12 spaces during the weekend peak periods. The expected demand for car parking will therefore not exceed the proposed number of spaces at the site.
- 6.28 With regard to cycle parking provision, the development will provide 5 Sheffield stands, providing parking for 10 bicycles. The type and amount of cycle parking proposed is suitable and is considered to accord with the minimum standards outlined in the Revised Parking Standards and Design SPD.
- 6.29 The planning application is also accompanied by a Travel Plan. The overall aim of the Travel Plan is to reduce reliance upon the private car for staff and to promote active modes of travel (walking and cycling) to and from the site. The Travel Plan, which is envisaged to become a live document, thus provides a number of measures and monitoring processes which Greggs will incorporate in its operations at the site.
- 6.30 Having regard to the information set out above and contained within the accompanying Transport Assessment it has been demonstrated that the proposed development is acceptable from a highways, access and parking perspective. The proposed development will not have an unacceptable traffic impact and will not give rise to any highway safety concerns; safe and acceptable means of access can be provided to the site for pedestrians, cyclists and cars and an appropriate level of parking provision is provided that accords with adopted standards.
- 6.31 Accordingly, we conclude that the scheme accords with Policies TR1, TR3, TR4 and TR5 of the Local Plan, together with the government guidance contained within the NPPF and that there are no transport-related reasons for resisting the proposed development.

IMPACT ON RESIDENTIAL AMENITY

- 6.32 Given the proximity of the site to housing, it is important that consideration is given to the potential impact of the proposed development on the residential amenity of adjacent residential occupiers. Consideration is given to the following matters: noise, odour, overlooking and loss of privacy and external lighting.

NOISE

- 6.33 Greggs have a number of pieces of external plant and equipment that have the potential to generate noise. Full details of all external plant is included within the planning submission, including details of its siting externally. There is also the potential for noise to be generated from deliveries to the site. The application is therefore accompanied by a Noise Impact Assessment which assesses the impact of potential noise from site on adjacent residential occupiers.
- 6.34 With regard to external plant, the assessment demonstrates that there is no exceedance of specified standards at residential properties to the east of the site. However, without mitigation there may be a slightly exceedance of standards at properties to the north.
- 6.35 It is therefore proposed that a short section of acoustic fence is provided along part of the northern boundary of the site. Full details of the new fence are contained on the Boundary Treatment Plan. With the new fence in place, specified noises standards will be met and residential occupiers to the north of the site will not be adversely impacted by noise from external plant and equipment at the site.
- 6.36 Consideration has also been given within the Noise Assessment to potential noise from deliveries to the site. The Noise Assessment demonstrates that noise from deliveries will not give rise to an exceedance of specified standards and therefore that noise from deliveries will not be detrimental to the residential amenity of adjacent occupiers.
- 6.37 Finally, it is important to note that the extant use of the site is as amenity pub / restaurant which has unrestricted trading and delivery hours and an external beer garden. The premises also have a substantial extract and ventilation system at the rear of the premises. This is a material planning consideration to which appropriate weight should be given in the determination of this planning application and consideration of noise issues.

ODOUR

- 6.38 The proposed development has the potential to impact on the residential amenity of adjacent occupiers by way of odour and smell. As such, the application is supported by a Ventilation Report including an Odour Risk Assessment. The application submission also includes full details of the kitchen ventilation and extraction system that will be installed in the building to ensure no issues with odour from the development.
- 6.39 It is worth noting that notwithstanding the inclusion of a kitchen ventilation and extraction system, the Greggs operation involves limited on site cooking with most food being prepared off-site and reheated or served cold. As such, the risk of unacceptable odour from the development is very low.
- 6.40 Notwithstanding this fact, the submitted Ventilation Report demonstrates that with implementation of the proposed kitchen ventilation and extraction system, the proposed development will not cause any issues with smell or odour detrimental to the amenity of adjacent residential occupiers.

OVERLOOKING AND LOSS OF PRIVACY

- 6.41 Given the proximity of residential properties to the north and east, consideration has been given to the potential for overlooking and loss of privacy and whether the development will be overbearing on its neighbours.
- 6.42 The proposed new building is single storey in height and smaller in scale than the buildings that currently occupy the site. The proposed building is also positioned in the centre of the site away from boundaries. Given the scale and siting of the proposed building and its relationship with adjacent residential properties, it is not considered overbearing or likely to be dominant to adjacent residential occupiers.
- 6.43 With regard to overlooking and loss of privacy, whilst it is proposed that the main restaurant window faces northwards towards residential properties on Morlands Avenue, there will be no intervisibility between the uses due to the 2.1 boundary fence and landscaping and the positioning of both buildings. Accordingly, residential occupiers to the north will not experience any overlooking or loss of privacy as a consequence of the development.

- 6.44 With regard to properties to the east, there are no windows on the east elevation of the building and no windows in the gable of this adjacent residential property. The existing boundary fence will also be retained. Accordingly, no loss of amenity will be experienced.

LIGHTING

- 6.45 The proposed development will require external lighting and in particular floodlighting to the car park and drive thru. Given the proximity of residential occupiers, the application submission contains full details of external lighting to these areas with a Lighting Report and Light Spillage Plan.
- 6.46 The Lighting Report and Light Spillage Plan demonstrate that proposed floodlighting to the car park and drive thru will ensure that all areas of the site are adequately lit for the safety of customers and staff, whilst not causing light spillage and protecting the residential amenity of adjacent occupiers.
- 6.47 To conclude, the planning submission demonstrates that detailed consideration has been given to the potential impact of the proposed development on the amenity of adjacent residential occupiers on Morland Avenue to the north and Bath Road to the east and that the scheme has been designed to safeguard and protect these occupiers' amenity.
- 6.48 The application scheme is thus considered to accord with Policy CC8 of the Local Plan, together with paragraph 185 and we find no reasons why planning permission for the proposed development should be refused on grounds of an unacceptable adverse impact on residential amenity. The proposed development is also considered to comply with Policy EN17 of the adopted Local Plan which is concerned specifically with noise from external plant and equipment.

IMPACT ON TREES

- 6.49 The site contains a number of trees. These are located predominantly around the perimeter of the site and are generally immature and of poor quality.
- 6.50 Notwithstanding this fact, the application is supported by a Arboricultural Impact Assessment and Method Statement (AIA), which includes a survey of all trees on the site, a Tree Constraints Plan and Tree Impact and Protection Plan. The AIA notes that the site contains 10 individual trees, 2 groups of trees and 1 hedge.

- 6.51 Of the 10 individual trees, there is 1 Category B; 6 Category C and 3 Category U trees. The tree groups have categorised as C and U respectively. The hedge has been assessed as Category C. Trees that are categorised as C are of low value with a limited life expectancy. Trees categorised as U have defects and should be removed regardless of the development.
- 6.52 It is proposed to remove 8 individual trees and two groups of trees as part of the redevelopment of the site. With the exception of 1 tree (T5), all trees proposed for removal have been assessed as Category C or U. 2 trees will be retained (T9 and I0), alongside the boundary hedge which will be enhanced (see Biodiversity Metric Report and Landscape Plan).
- 6.53 The removal of these trees is necessary to facilitate the redevelopment of the site for a Greggs drive thru retail / bakery unit. Whilst regrettable, the losses will be fully mitigated within the site by planting of 7 new trees as part of the landscape scheme for the site.
- 6.54 It is proposed that a number of these new trees are positioned along the Bath Road frontage as requested by the Council in pre-application advice, which will support the aim of tree planting as a means to offset emissions within the Bath Road Air Quality Management Area. The trees will also enhance the visual amenities of the locality and street scene in the longer term and soften views of the site.
- 6.55 The proposed development is considered to accord with Policy EN14 of the adopted Local Plan, together paragraph 131 of the NPPF.

LANDSCAPING AND BIODIVERSITY NET GAIN

- 6.56 In pre-application advice, the Council requested that the application be supported by proposals to landscape the site and that the development demonstrate a 'net gain' in biodiversity.
- 6.57 The application is therefore supported by a comprehensive landscape scheme which has been informed by an accompanying Biodiversity Metric Report. The landscape scheme shows that the completed development will deliver a total gain of 0.39 habitat units and a 77.41% uplift in biodiversity as compared to the site currently.
- 6.58 This is achieved in a variety of ways, including the retention and improvement of existing habitat of value on the site consisting of some amenity grassland in the northeast of the site and an area of dense scrub in the north and northwest of the site, together with the creation

of new habitats within landscaped areas around the site and the planting of 8 medium sized native trees.

- 6.59 Whilst the Biodiversity Metric does not take account of additional species enhancements, attention is drawn to the various positive measures being implemented within the development in order to enhance the ecological value of the site. These are detailed on the Landscape Plan and include 10 no. bird and bat boxes, the installation of 2 no. hedgehog houses; the introduction of 2 no. log piles and 3 no. insect houses.
- 6.60 Having regard to the above, it is considered that the proposed development accords with Policy EN12 of the adopted Local Plan, together with relevant government guidance in respect of biodiversity contained in the NPPF.

ECOLOGY

- 6.61 An ecological walkover of the site was undertaken in July 2022. The results of the survey and its recommendations are outlined in the accompanying Preliminary Ecological Appraisal and Bat Roost Assessment (PEA) prepared by RSK.
- 6.62 The PEA identifies that the existing buildings have high potential to support roosting bats due to the presence of suitable features. Separate dusk emergence and dawn re-entry surveys were therefore undertaken in August 2022; the results of which are summarised in the accompanying Bat Report prepared by RSK.
- 6.63 During the surveys, one common pipistrelle and one possible soprano pipistrelle were recorded emerging and re-entering the building. Three species of bat were also recorded foraging and commuting in the vicinity of the building during the dusk survey and two species were recorded during the dawn survey. Due to the observed emergence and re-entry of the pipistrelles, the Bat Report confirms that the building contains a bat roost. A Natural England European Protected Species Mitigation Licence (EPSML) will therefore be required prior to the demolition of the building.
- 6.64 The EPSML will require measures to mitigate the loss of the roosts on the local bat population. The Bat Report thus recommends the installation of at least four bat boxes within the development to compensate for the loss of the two day roosts. These are detailed on the submitted Landscape Plan.

- 6.65 In regard to other ecology, no invasive species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were recorded during the ecological walkover in July 2022.
- 6.66 The PEA identifies that invertebrates will not represent a significant constraint to the proposed development. However, the shrubbery to the north east of the building should be removed in the presence of an ecologist to ensure any potential stag beetle habitat is protected.
- 6.67 The PEA confirms that any scrub and other nesting bird habitat should only be removed outside of the bird nesting season (i.e. March to August inclusive). However, if this is not possible, then these areas will need to be surveyed by an ecologist immediately prior to clearance.
- 6.68 The site is considered to provide suitable habitats for hedgehogs. The PEA therefore recommends a number of measures which should be employed during the construction phase to minimise the risk of trapping hedgehogs. These include; (a) employing an ecological clerk of works to oversee site clearance works; (b) timing the works to avoid hedgehog hibernation periods (October / November and March / April); (c) no night-working and; (d) not leaving any excavations open overnight or placing 'escape ramps' in open excavations to prevent the inadvertent trapping of hedgehogs (and other animals). The landscape scheme provides details of 2 no. hedgehog houses to support hedgehogs and enhance the future ecological potential of the site.
- 6.69 There is one statutory protected site within 1km of the site, namely Lousehill Copse (approximately 900m north). In addition, there are four non-statutory designated sites within 1km, namely Prospect Park, Medway Fringe, Lousehill Copse and Holy Brook. Given the scale of the proposed development and its location, the PEA concludes that no significant impacts on these sites will occur.
- 6.70 Having regard to the information contained above and within the supporting ecology reports, it has been shown that the potential impacts of the proposed development on ecology have been fully considered and assessed. Bat surveys have confirmed that the existing building contains a bat roosts. An EPSML will therefore be required to address and mitigate the impact of the development on bats. However, their presence is not an insurmountable constraint to the redevelopment of the site.

- 6.71 With regard to other species, no evidence was found of any other protected species on the site, although evidence was found that the site currently supports some ecology including birds, hedgehogs and various invertebrates. Accordingly, the scheme proposes a range of measures to support these species and enhance the site's future ecology potential. These measures are detailed on the submitted Landscape Plan.
- 6.72 It is considered that the application scheme thus complies with Policy EN12 and there are no valid planning reasons for refusing planning permission on grounds of an unacceptable impact on ecology.

AIR QUALITY

- 6.73 Given the location of the site in an Air Quality Management Area (AQMA), the planning application is supported by an Air Quality Assessment prepared by E3P.
- 6.74 During the construction phase of the development, there is the potential for air quality impacts to arise as a consequence of fugitive dust emissions from the site. Subject to the implementation of dust control measures, the residual significance of potential air quality impacts from dust generated by the proposed demolition, earthworks, construction and trackout activities is predicted to be not significant.
- 6.75 During the operational phase of the development, air quality impacts may occur due to road traffic exhaust emissions associated with vehicles travelling to and from the site. The Assessment therefore provides the results of dispersion modelling to quantify NO₂, PM₁₀ and PM_{2.5} concentrations, with and without the proposal. The concentrations generated from traffic associated with the proposal is predicted to be negligible at all sensitive receptor locations; hence, no mitigation measures are required.
- 6.76 Notwithstanding the above, the proposal incorporates a number of mitigation measures to offset / reduce traffic exhaust emissions. These include the provision of; (a) 10 cycle parking spaces; (b) 10 EV charging points and; (c) a Travel Plan for staff, which seeks to reduce reliance upon the private car and promote active modes of travel to and from the site.
- 6.77 Subject to the implementation of dust control measures during the construction phase of the development, the scheme is considered to be acceptable in air quality terms. The proposal is therefore in accordance with Policy EN15 of the Local Plan, together with paragraph 186 of the NPPF.

GROUND CONDITIONS

- 6.78 The planning application is accompanied by Phase 1 and 2 Ground Investigation Reports prepared by Remada.
- 6.79 The Phase 1 desk study identified a number of on-site potential sources of contamination that required further investigation. Accordingly, a Phase 2 intrusive ground investigation was undertaken.
- 6.80 The Phase 2 Ground Investigation Report presents the results of soil chemical analysis at the site. None of the analytes tested were detected to be at concentrations that exceeded the human health GAC protective of on-site workers. The contaminants identified, including metals and inorganic contaminants, are of low solubility and mobility and as such are unlikely to present a risk to groundwater beneath the site. The site is not therefore considered to be contaminated and no further investigations are required.
- 6.81 The Phase 2 Ground Investigation Report also summarises the results of gas monitoring at the site. The results show that ground gas protection measures will not be required for the proposed development. No further action is therefore required with regard to ground gas.
- 6.82 On the basis of the information contained in the supporting Phase 1 and 2 Ground Investigation Reports, it is concluded that there are no contamination issues on the site and that from a ground condition perspective the site it is suitable for redevelopment for a Greggs drive thru retail bakery unit. Accordingly, we are of the view that the development complies with Policy EN16 of the Local Plan, together with paragraphs 183 and 184 of the NPPF.

DRAINAGE AND FLOODING

- 6.83 The site is in Flood Risk Zone 1 and is not considered to be at risk of any form of flooding. The site is less than 1 hectare in size and as such, there is no requirement for the application to be accompanied by a Flood Risk Assessment. The application is however accompanied by a Drainage Strategy which provides details of the proposed foul and surface water drainage strategy for the site.
- 6.84 With regard to surface water and having regard to the conclusions of the Phase 2 Ground Investigation Report, it is proposed that surface water be disposed of by means of infiltration. The drainage strategy proposes the use of soakaways consisting of geo-cellular crates, located beneath the drive thru car park, to facilitate the discharge of surface water run-off via infiltration to the underlying strata. Surface water run-off from the car park and the rainwater

pipes on the building will be collected via a series of drainage channels and gulleys, which will feed into the geo-cellular crates.

- 6.85 In line with Government guidance, the system will provide sufficient storage for the 1 in 100-year storm event, with a 40% allowance for the effects of climate change.
- 6.86 The surface water drainage strategy will also incorporate a number of pollution control measures. Surface water flows will be directed to trapped gulleys in the first instance, before entering catchpit manholes in order to separate out sediment and metals. An interceptor system will also be incorporated upstream of the system as an additional control measure to separate out any remaining pollutants, such as metals and hydrocarbons.
- 6.87 In terms of foul drainage, it is proposed to discharge foul flows to the Thames Water sewer to the east of the site as existing. Thames Water has confirmed that its foul water network contains sufficient capacity to accommodate flows from the proposed development.
- 6.88 Having regard to the information contained above and set out within the supporting Drainage Strategy it has been demonstrated that satisfactory and acceptable foul and surface water drainage can be achieved from the development and that the application scheme complies with Policy EN18 of the Local Plan, together with relevant guidance in respect of flooding contained in the NPPF. In particular, the development utilises a SUDs system to deal with the disposal of surface water drainage in line with both local and national planning policy.

SUSTAINABILITY

- 6.89 The adopted Local Plan contains a number of policies (Policy CC2-CC6) which taken together aim to ensure that new development is sustainable and response to climate change.
- 6.90 Turning firstly to Policy CC2, this aims to ensure that all new development is of a sustainable design and construction and uses energy, water and materials efficiently and takes account of climate change. The policy goes on to state that minor non-residential development should meet a 'BREEAM 'Very Good' standard as a minimum.
- 6.91 Due to the nature and scale of the proposed development, achieving a BREEAM rating is neither practical nor a viable option. This situation is complicated further by the fact that the applicant will deliver only the shell of the development with the fit out being carried out separately by the end user. Where the construction of the development is not in the control of a single construction team, achieving any BREEAM rating is extremely difficult. Where the

development is small in scale, as is the case with this scheme, it becomes entirely unrealistic and unfeasible.

- 6.92 That is not to say however that the development cannot be a sustainable and demonstrate the principles of sustainability and sustainable design and construction in other ways.
- 6.93 To demonstrate that the proposed development is sustainable, the application is supported by a Sustainability Statement rather than a BREEAM Pre- Assessment. This sets out the many sustainability measures that will be adopted at the site and incorporated into the design of the building in order to ensure that it responds to the requirements of Policy CC2 – CC6.
- 6.94 The document sets out the sustainability credentials of the development under each of the subheadings within BREEAM in order to provide clear information on each topic area and how the development addresses and responds to each subject area. A review of the document demonstrates that the development has been designed to be sustainable, reduce energy use and respond to climate change and whilst it won't achieve a BREEAM rating, it satisfies and responds to the overarching aims and objectives and intentions of BREEAM and thus accords with the thrust of Policy CC2 of the Local Plan.
- 6.95 With regard to Policy CC4 which is concerned with the inclusion of decentralised energy provision. As the development is less than 1,000 sq. m of non-residential floor space, the policy is not applicable.
- 6.96 In terms of Policy CC5 which aims to reduce waste, the submitted plans show that provision will be made to facilitate waste storage and recycling.
- 6.97 Finally, with regard to Policy CC6 the site is located in a sustainable location on Bath Road within walking and cycling distance of a large residential population and accessible by public transport.
- 6.98 To conclude, it is considered that whilst the development does not demonstrate a BREEAM rating it has been designed to be sustainable and thus it accords with Policies CC2-CC6 of the adopted Local Plan and is acceptable from a sustainability perspective.

7 SUSTAINABLE DEVELOPMENT

- 7.1 The NPPF highlights at paragraph 8 that at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development. The NPPF goes on to state that there are three dimensions to sustainable development: social, economic, and environmental.
- 7.2 These are not criteria against which a development should be assessed and determined to comply with or not comply. Rather, they are a useful tool to highlight how the proposed development contributes to each of these objectives in order to demonstrate that it is sustainable.
- 7.3 The proposed development will contribute to the objectives of sustainable development, as follows:

SOCIAL

- The proposal is a well-designed scheme that responds to users' needs and the character of the area.
- The scheme will be a safe, inclusive and accessible development.
- The proposal will improve the appearance and visual amenity of the site, and will avert the risk of any crime and safety impacts escalating.
- The proposal will provide a food-on-the-go offer for the benefit of passing road users and will widen consumer choice.

ECONOMIC

- The proposal will bring the site back into economic use, creating 20 new jobs in addition to jobs in the supply chain.
- The proposal will create jobs during the construction phase of the development.
- The creation of new jobs will lead to an increase in earnings and expenditure in the local area.
- The proposal will create healthy competition between similar roadside facilities.
- Revenue from business rates as a consequence of the site being in an active use.

ENVIRONMENTAL

- The proposal will secure the regeneration of a previously developed site in a prominent and accessible location.
- The site is accessible by modes of sustainable transport.
- The proposal incorporates a range of passive and active sustainable design measures.
- The proposal will provide 10 EV charging spaces and 10 cycle parking spaces.
- The proposal will result in an improvement to the surface water drainage regime on the site, utilising infiltration and pollution control techniques, and will reduce the risk of flooding on and off-site.
- The proposal will secure a demonstrable net gain for biodiversity, equivalent to 0.39 habitat units or 77.41%.
- The proposal will incorporate a recycling strategy.

8 CONCLUSIONS

8.1 This Planning Statement has assessed the proposed development against the relevant policies contained within the Development Plan, together with the provisions of the National Planning Policy Framework and all other material considerations.

8.2 The George and Dragon closed in March 2020, at the start of the Covid-19 pandemic. Whilst the pandemic hastened its demise, the premises had already been earmarked by Greene King for closure as a result of poor trading over many years. The site has been extensively marketed for a continued pub / restaurant uses without success, and re-opening the premises would not be financially viable for any operator or investor.

8.3 Accordingly, Greene King seek planning permission for the redevelopment of the site to provide a drive thru retail / bakery unit (Class E). Specifically, full planning permission is sought for:

“Demolition of existing pub / restaurant and erection of 1 no. drive thru retail / bakery (Class E) including erection of supporting structures, together with alterations to means of access, car parking, landscaping and associated works.”

8.4 The redeveloped site will be occupied and managed by Greggs.

8.5 In this Statement, we have considered the impact of the proposed development and it has been assessed against all relevant planning policies and other relevant material considerations. We conclude the following:

- The proposed development will result in the loss of an amenity pub/ restaurant and an extant Class E use and not a public house. Policy RL6 of the adopted Local Plan is thus not applicable. However, in the event that the Council disagree with this position it has been robustly demonstrated that the proposed development complies fully with the requirements of this Policy. The loss of the existing use on the site is thus wholly acceptable and there are no grounds for refusing planning permission for the development on this basis.
- The premises has been extensively marketed for continued use without success, and re-opening the premises has been shown to be financially unviable.

- The permanent loss of the premises will not have an adverse impact on the supply of pub / restaurant facilities in the area. The function of the George and Dragon is already being fulfilled by a plethora of accessible alternative facilities in the local area. It has therefore been clearly demonstrated that there is no need for the use.
- The existing building has been assessed to be of low heritage significance. Given this, and taking into account the substantial and wide ranging public benefits of the scheme, it has been shown that the loss of the building is acceptable and the benefits significantly and demonstrably outweigh the harm. The building has also been subject to the required Level 2 Historic Buildings Recording.
- The building is starting to appear derelict, is falling into disrepair and is beginning to represent a security risk. The proposal will improve the appearance and visual amenity of the site and wider locality and will avert the risk of any crime and health and safety impacts.
- The proposal will secure the regeneration of a previously developed site in a prominent and accessible location, bringing the land back into a productive economic use.
- The proposal will create 20 new jobs on the site, in addition to jobs during the construction phase and in the supply chain.
- The proposal will provide a '*food-on-the-go*' offer for the benefit of the community and passing road users. It will widen consumer choice and will create healthy competition between roadside facilities.
- The application satisfies the sequential test. The site is accessible and well connected to the nearest designated centres, and is suitably located for the proposed use.
- The proposal is a well-designed scheme that responds to users' needs and the character of the area.
- The proposal incorporates EV charging points and cycle parking spaces, and will be accessible by sustainable transport modes. These will be promoted to staff through a Travel Plan.

- The access and servicing arrangements and site layout, as proposed, is safe and suitable, and the level of parking proposed is appropriate. The scheme will not result in a reduction in safety for users of the highway.
- The proposal will have no adverse impact on local residential amenity.
- The proposal is acceptable in ecological terms and will secure a demonstrable net gain for biodiversity, equivalent to 0.39 habitat units or 77.41%
- The proposal incorporates a range of passive and active sustainable design measures.
- Subject to the implementation of dust control measures during its construction phase, the proposal is acceptable from an air quality perspective.
- The proposal is acceptable from a contaminated land and geo-technical perspective.
- The surface water drainage from the site will be dealt with via a SUDS solution. The strategy will reduce the risk of flooding on and off-site and will incorporate pollution control measures.
- The proposed development will contribute to the three objectives of sustainable development.

8.6 Paragraph 10 of the NPPF sets out a presumption in favour of sustainable development. It has been shown in this Planning Statement that the scheme represents a sustainable form of development and one that should be supported.

8.7 Paragraph 11 of the NPPF requires decision takers to approve development that accords with an up-to-date development plan without delay. In this case, it has been shown that the application scheme accords with the development plan, and in the absence of any material planning considerations that indicate that a different decision should be taken, we respectfully request that planning permission is granted for the proposed development without delay.

Appendix 1

