



Great Brighams Mead,
Vastern Road, Reading
RG1 8DJ

PLANNING STATEMENT

*Construction of a two-storey roof (third and fourth floor)
extension to accommodate 100 aparthotel rooms (Use Class C1)
with associated parking, cycle stores and bin stores*

May 2022

Rev A

INTRODUCTION

1. This Planning Statement has been prepared on behalf of Kings Oak Miami LLP (the Applicant) in support of their Planning Application submitted for Great Brighams Mead, Reading RG1, which seeks to create a third-floor and fourth-floor extension to provide 100 serviced apartments (Use Class C1).
2. This document should be read in conjunction with the following drawings prepared by Peek Architects and supporting documents listed below:-
 - *Full Planning Application Form*
 - *CIL Forms*
 - *Site Location Plan P1048-EX112*
 - *Existing plans:*
 - *P1048-PL111 Existing block plan*
 - *P1048-EX001 Existing Ground Floor Plan*
 - *P1048-EX002 Existing First Floor Plan*
 - *P1048-EX003 Existing Second Floor Plan*
 - *P1048-EX005 Existing Roof Plan*
 - *P1048-EX006-A- Existing South Elevation*
 - *P1048-EX007-C- Existing North Elevation*
 - *P1048-EX008-B- Existing West Elevation*
 - *P1048-EX009 Existing East Elevation*
 - *P1048-EX013-C- Existing Inner east Elevation*
 - *P1048-EX015-A- Existing Street Scene – Vastern Rd*
 - *P1048-EX016-A- Existing Street Scene -Caversham Rd into Brigham Rd*
 - *Proposed plans:*
 - *P1048-GA1100W – Proposed Ground Floor*
 - *GBM-PD101 Proposed First Floor*
 - *GBM-PD102 Proposed Second Floor*
 - *P1048-PL503J – Proposed Third Floor*

- *P1048-PL504H – Proposed Fourth Floor*
- *P1048-PL505A – Proposed Roof Plan*
- *P1048-PL107F Proposed North Elevation*
- *P1048-PL508E Proposed South Elevation*
- *P1048-PL509E Proposed East Elevation*
- *P1048-PL510E Proposed West Elevation*
- *P1048-PL513-B- Proposed Inner East Elevation*
- *P1048-PL514-B- Proposed Inner West Elevation*
- *P1048-PL515-A- Proposed Street Scene -Vastern Rd*
- *P1048-PL516-A- Proposed Street Scene – Caversham Rd Caversham Rd into Brigham Rd*

3. Additionally, the planning application is supported by the following technical reports/assessments and other material comprising:

- *Design and Access Statement (by PEEK)*
- *Transport Statement (by Stantec)*
- *Flood Risk Assessment inc. Exceptions Test (by Stantec)*
- *Daylight Sunlight Assessment (by FPD)*
- *Energy and Sustainability Report (by FPD)*
- *Sequential Assessment (flood) (by FPD)*
- *Sequential Assessment (town centre) (by FPD)*
- *Landscaping Principles Statement (by FPD)*
- *Utilities Statement (by FPD)*
- *Preliminary Ecology Appraisal and Roost Assessment (by Arbtech)*
- *Biodiversity Net Gain Report (by Arbtech)*
- *Tree Survey (by Arbtech)*
- *AIA and Method Statement (by Arbtech)*
- *Contaminated Land Assessment (by Stantec)*

4. The supporting information has been prepared in accordance with the local authority's validation requirements.

5. This Statement identifies planning issues relevant to the determination of the planning application. In particular, the Statement:
 - i) Describes the site and surroundings, and planning background;
 - ii) Describes the formal content of the application;
 - iii) Reviews and appraises relevant planning policy and guidance; and
 - iv) Identifies and appraises relevant planning considerations.
6. The Summary and Conclusions section presents a brief review of the content of this Statement.
7. This application follows Reading Borough Council's (RBC) decision to give prior approval (under Class O, Part 3 of Schedule 2) for a change of use from office use Class B1(a) to use Class C3 to create 110 residential units arranged over ground, first and second floor of the application site.

SITE CONTEXT

8. The application site is located to the north of Reading town centre and south of the River Thames and fronts onto the Caversham Road/Vastern Road roundabout.
9. The site comprises a three-storey office building called Great Brighams Mead with a part brick façade, a hipped roof.
10. The site is located in a prominent position within the public realm. It is served by a single vehicle access via the Caversham Road/Vastern Road roundabout to the south of the site. This access also provides the primary pedestrian access routes into the site. A secondary pedestrian access point is located towards the northwest of the site leading on to Brigham Road.

11. Great Brighams Mead is located centrally with respect to the site boundary and has an access route circulating the building providing access to parking and accommodating servicing and deliveries.
12. The surrounding character of the area is mixed use, although immediately surrounding the site, there are two-storey terraced Victorian houses along Brigham Road to the west and De Montfort Road to the east. More recent residential development is located immediately to the north at Regents Riverside, where the flatted residential development comprises 4/5 storeys.
13. The building provides approximately 6,190 sqm of office accommodation over three floors. The building is currently in the process of being converted from commercial floorspace to residential flats (Prior Approval for a change of use to residential to provide 110 dwellings, granted 1st June 2021, R/N: 210567).
14. The external areas of the site comprise 160 car parking spaces. This number was reduced to the provision of 158 car parking spaces. A reduction on the extant 160 car parking spaces. This is due to the removal of seven spaces for bin collection and the introduction of 5 new disabled parking spaces.
15. The site lies outside, but on the edge, of the Central Core Policy Area but within the Boundary of Reading's Central Policy Area. The central core area lies at the heart of Reading Borough, consisting primarily of retail and commercial office developments with good transport hubs. The site is well connected to the central core area and is within walking distance to Reading Railway Station and the vast assortment of town centre amenities.
16. The site is not listed and is not located within a conservation area.
17. The Environment Agency (EA) Flood Zone mapping indicates that the site is located in Flood Zone 3 'High Probability' of the River Thames (as defined in Planning Practice Guidance (PPG) 'Flood Risk and Coastal Change' Table 1): - Flood Zone 3

‘High Probability’ (greater than 1 in 100 (>1.0%) annual probability of river flooding).

18. The site is located within an Air Quality Management Area.

19. The site is surrounded by mature trees to the south and west of the building.

20. PLANNING HISTORY

21. RBC’s public access database records the following planning history:

22. **221479** | *Application for prior approval of 72 proposed New dwellinghouses on Detached buildings in commercial or mixed-use - Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 20, Class AA, for the proposed additional storeys to result in a third and fourth floor; Refused 21 November 2022.*

23. **220778** | *Application for prior approval of 72 proposed New dwellinghouses on Detached buildings in commercial or mixed use - Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 20, Class AA, for the proposed additional storeys to result in a maximum overall building height of 21.92m; Refused 4 August 2022.*

24. **210567** | *Change of use from office use Class B1(a) to use Class C3 to comprise 110 residential units. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015; Approved 1st June 2021.*

Current use

25. The existing building on-site provides 6,190 sqm of office accommodation across three floors. The building benefits from Prior Approval (ref. 210567) for a change

of use to 110 residential units and works to implement this permission are in progress.

26. PLANNING POLICY CONTEXT

27. Section 38(6) of the Planning and Compulsory Purchase Act, 2004, requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

28. The Development Plan for RBC comprises the Reading Borough Local Plan, adopted on 4th November 2019. This document sets the borough's planning policies for development in Reading up to 2036, and is the main consideration in deciding planning applications.

29. The National Planning Policy Framework (NPPF) is the key material consideration which must be taken into account by planning decision-makers. The NPPF, which is expounded upon by the Government's National Planning Practice Guidance (NPPG), sets out a presumption in favour of sustainable development including where the Development Plan is silent, absent or the policies are out of date.

30. NATIONAL PLANNING POLICY

- National Planning Policy Framework (NPPF) 2021
- National Planning Policy Guidance 2014 (PPG) (onwards)
- National Design Guide 2019 (NDG)

31. Central Government policy and guidance is set out in the National Planning Policy Framework (NPPF), published in March 2012 with subsequent updates, the latest being in 2021.

32. The main NPPF sections, in so far as they relate to this proposal, are set out below.

Section 2 – Achieving Sustainable Development

Section 6 – Building a strong, competitive economy

Section 7 – Ensuring the vitality of town centres

Section 9 – Promoting Sustainable Transport

Section 11 – Making Effective Use of Land

Section 12 – Achieving Well-Designed Places

Section 14 – Meeting the Challenge of Climate Change, Flooding and Coastal Change

33. The NPPF identifies three key dimensions to which the planning system can contribute towards achieving sustainable development, namely:

- An economic role – by contributing to a strong, responsive and competitive economy;
- A social role – supporting strong, vibrant and healthy communities, by creating a high quality built environment, and
- An environmental role – contributing to protecting/enhancing the natural and built environment, including minimising waste and pollution and mitigating climate change.

34. The NPPF is underpinned by a presumption in favour of sustainable development, which the document identifies as a “golden thread” running through both plan-making and decision-taking. In terms of decision taking, paragraph 14 advises that local planning authorities (LPAs) should seek to approve development proposals which accord with the Development Plan without delay, whilst also granting permission for proposals in instances where the Development Plan is absent, silent or where relevant policies are out of date – unless any adverse impact in doing so significantly outweigh the benefits.

35. Additionally, the NPPF sets out core planning principles (paragraph 17) which should underpin both plan-making and decision-taking. The main core principles relevant to this proposal confirm that planning should:

- Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs;
- Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- Encourage the effective use of land by re-using land that has been previously developed (brownfield land);
- Promote mixed use development and encourage multiple benefits from use of land in urban and rural areas, and
- Actively manage patterns of growth that make the fullest possible use of public transport, walking and cycling and focus development which is, or can be made sustainable.

36. In addition to the core principles, the Framework sets out guidance relative to types of development and environmental considerations. The following is considered relevant.

Building a Strong, Competitive Economy

37. The NPPF advises that investment in business should not be over-burdened by the combined requirements of planning policy expectations. LPAs should, inter alia, support existing business sectors, taking account of whether they are expanding or contracting, and policies should be flexible enough to accommodate needs not anticipated in the plan.

Ensuring the Vitality of Town Centres

38. The NPPF seeks to promote the role of town centres, which should be recognised by LPAs, when preparing Local Plans, as representing the heart of their communities where policies should support their viability and vitality.

39. It is confirmed that LPAs should apply sequential tests to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan.

40. It advises that when considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and LPAs should demonstrate flexibility on issues such as format and scale (paragraph 86).

Promoting Sustainable Transport

41. The NPPF advises that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment, which should have regard to:

- Opportunities for sustainable transport modes;
- Safe and suitable access for all people, and
- Improvements that can be undertaken within the transport network.

42. The NPPF advises that development should only be prevented or refused on transport grounds where the residual cumulative impact of development is severe (paragraph 111).

43. It advises that developments should be located and designed where practical to, inter alia:

- Give priority to pedestrian and cycle movements and have access to high quality public transport facilities;
- Create safe and secure layouts which minimise conflict between traffic and cyclists or pedestrians;
- Incorporate facilities for charging plug-in and other ultra-low emission vehicles, and
- Consider the needs of people with disabilities by all modes of transport.

44. A key tool to facilitate this will be a Travel Plan and all developments which generate significant amounts of movement should be required to provide a Travel Plan (paragraph 113).

Making effective use of land

45. The NPPF advises that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land. (paragraph 119).

46. Paragraph 120 goes on to promote and support the development of under-utilised land and buildings and supports opportunities to use the airspace above existing residential and commercial premises for new homes.

Requiring Good Design

47. The NPPF advises that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development (paragraph 126).

48. It advises that decisions should aim to ensure that developments, inter alia:

- Function well and add to the overall quality of the area;
- Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places;
- Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks;

- Respond to local character and history, and reflect the identity of local surroundings and materials while not preventing or discouraging appropriate innovation;
- Create safe and accessible environments, and
- Are visually attractive as a result of the architecture and appropriate landscaping (paragraph 130).

49. The guidance emphasises that whilst visual appearance and the architecture of individual buildings are important, securing high quality and inclusive design goes beyond aesthetic considerations. As such, decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment (paragraph 20).

Meeting the Challenge of Climate Change and Flooding

50. The Framework advises that planning plays a key role in helping shape places to secure reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change and supporting the delivery of renewable and low carbon energy and associated infrastructure (paragraph 152).

51. In determining planning applications, LPAs should expect new development to:

- Comply with Local Plan Policies on requirements for decentralised energy supply, and
- Take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption (paragraph 157).

52. In terms of flood risk, the Framework advises that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere (paragraph 159).

53. When determining planning applications, LPAs should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where informed by a site specific flood risk assessment following the Sequential Test.

Conserving and Enhancing the Natural Environment

54. The Framework sets a number of guidelines that seek to ensure the planning system contributes to, and enhances, the natural and local environment through, inter alia:

- Protecting and enhancing valued landscapes;
- Minimising impacts on biodiversity and providing net gains where possible, and
- Preventing development from contributing to, or being adversely affected by, unacceptable levels of soil, water or noise pollution.

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55. Paragraph 119 confirms that decisions should encourage the effective use of land by re-using land that has been previously developed.

LOCAL PLANNING POLICY

56. RBC Local Plan (LP) adopted 2019 contains planning policies to manage development in Reading up to 2036. The LP is accompanied by a Proposals Map, which shows the geographical extent of policies in the plan.

57. The Proposals Map confirms the site falls within the borough's Settlement Boundary, where development is generally permitted, but outside the Central Core where "town centre uses" (including hotels) are to be located.

58. Additionally, the following allocations/designations apply;

- i) It is just outside the Thames Valley Major Landscape Feature.

59. Relevant Development Plan policies when assessing the proposal are as follows:

- Policy CC1: Presumption in favour of Sustainable Development
- Policy CC2: Sustainable Design and Construction
- Policy CC3: Adaptation to Climate Change
- Policy CC4: Decentralised Energy
- Policy CC5: Waste Minimisation and Storage
- Policy CC6: Accessibility and the Intensity of Development
- Policy CC7: Design and the Public Realm
- Policy CC8: Safeguarding Amenity
- Policy CC9: Securing Infrastructure
- Policy EN1: Protection and Enhancement of the Historic Environment
- Policy EN2: Areas of Archaeological Significance
- Policy EN3: Enhancement of Conservation Areas
- Policy EN15: Air Quality
- Policy EN16: Pollution and Water Resources
- Policy EN18: Flooding and Drainage
- Policy H5: Standards for New Housing
- Policy H8: Residential Conversions
- Policy TR1: Achieving the Transport Strategy
- Policy TR3: Access, Traffic and Highway-Related Matters
- Policy TR4: Cycle Routes and Facilities
- Policy TR5: Car and Cycle Parking and Electric Vehicle Charging
- Policy RL1: Network and Hierarchy of Centres
- Policy RL2: Scale and location of retail, leisure and culture development
- Policy CR1: Definition of Central Reading
- Policy CR2: Design in Central Reading
- Policy CR3: Public Realm in Central Reading
- Policy CR4: Leisure, Culture and Tourism in Central Reading

60. Supplementary Planning Documents and other guidance

- Revised Parking Standards and Design SPD (2011)

PROPOSALS

61. Description of development

62. The description of the development is as follows: “*Construction of a two-storey roof (third and fourth floor) extension to accommodate 100 aparthotel rooms (Use Class C1) with associated parking, cycle stores and bin stores.*”

63. Summary

64. The application proposal seeks full planning permission for the construction two additional storeys to form a third and fourth floor to accommodate 100 serviced apartments above the approved residential flats at ground, first and second floors.

65. The proposed development would comprise a mix of apartment sizes including 64x 1-beds and 36x 2-beds (62 rooms on the 3rd floor plus 38 rooms within the 4th floor roof space), with associated car and cycle parking and bin storage provided at ground floor level.

66. 3rd floor

- 34 x one-bedroom rooms – 3rd floor
- 28 x two-bedroom rooms – 3rd floor

67. 4th floor

- 30 x one bedroom rooms – 4th floor
- 8 x two bedroom rooms – 4th floor

68. Access to the proposed hotel units would be from separate access at the ground floor level and dedicated lift access would serve the top two floors to prevent mixing of residential occupiers and hotel visitors.

69. The proposal will be designed to be in keeping with the rest of the building below, the street and the local area. The extension would incorporate similar materials as the existing building and incorporates certain architectural features from the existing building.

70. The design has been guided by design panel comments made in relation to the refused Class O Prior Approval scheme (221479). As such the design approach moves the existing glazed 'top floor' up the from second floor level to the proposed third floor. A fourth floor is proposed within the rebuilt roof space, maintaining a broadly similar form to the existing roof.

71. The materials proposed at second floor would be specified to match the brick below. The proposed third floor would replicate the lightweight glazed appearance at second floor. The roof tiles would also be specified to match the existing tiles.

72. Vehicle and pedestrian access will remain as existing from Vastern Road.

73. Parking will be reconfigured to ensure sufficient bays are retained for the prospective residential occupiers and the proposed hotel use.

74. The updated parking arrangement is set out in the Transport Statement. In summary, the total car parking provision is reduced from 158 to 152, therefore representing a loss of six car parking spaces to accommodate bins stores. The proposed parking arrangement includes:

- Residential car parking
 - **118 parking spaces** (*110 standard, eight accessible*);
- Serviced Apartments
 - **34 parking spaces**; of which-
 - *14 are EV charging points (EVCP); and*

- *Two are disabled spaces;*

PLANNING ASSESSMENT

75. As noted in LP Policy CR1, the Central Area is shown on the Proposals Map. The Policy sets out that for the purposes of the application of the sequential test, 'other main town centre uses' (which includes Class C1 hotels) will take place in the Central Core.

76. LP Policy CR4 highlights that the Central Core will be the prime focus for major leisure, cultural and tourism development (including visitor accommodation). Directing serviced apartments and hotels to the Central Core is also emphasised by LP Policy CR6.

77. PRINCIPLE OF USE

78. The site is located within the Reading Central Area and immediately adjacent to the Central Core boundary which is defined by the A329, Vastern Road.

79. Policy CR1 advises that a sequential approach should be adopted for any development that proposes a main town centre use that is not within the town centre, to identify any potential alternative sites that are sequentially preferable. The policy states that "the Central Area boundary as shown on the Proposals Map will mark the edge of the town centre other than where specified. However, for the purposes of the application of the sequential test for main town centre uses, the following definitions as defined on the Proposals Map are used:

- Retail development will take place in the Primary Shopping Area;
- Major office development of over 1,000 sq m will take place in the Office Core; and
- Other main town centre uses will take place in the Central Core.

80. The sequential approach is applicable to 'main town centre uses' including leisure, cultural, visitor and arts facilities as well as offices.

A Sequential Assessment would normally follow the following process: -

Availability – whether the sites are available now or likely to become available for development within a reasonable time;

Suitability – whether due regard has been given to the requirements to demonstrate flexibility, and

Viability – whether development would be viable on the sites.

81. The application site is located just outside of the Central Core boundary, and as such only sites within the Central Core area would be considered sequentially preferable in terms of proximity to the services and sustainable travel options available within the Central Core Area.

82. A desktop search of other potential sites that are currently available and might be preferable to the application site in terms of their location has been undertaken. The search included sites within a one-mile radius of a Reading Postcode (RG1 2BD) approximately central to the Central Core area. The search set a minimum floor space at 1000 sqm with no upper limit. Searches for commercial properties were carried out on several property websites¹ but no available premises were found.

83. The application site is located just outside of Reading's Central Core and as such is extremely well positioned in relation to the heart of Reading with excellent pedestrian connections to the services and amenities offered by the in the centre of Reading.

¹ <https://www.loopnet.co.uk/>
<https://search.savills.com/>
<https://www.knightfrank.co.uk/>
<https://www.rightmove.co.uk/>

84. At the time of this submission, we can conclude that there are no sites located within the Central Core that could offer a sequentially preferable location and are currently available, suitable and viable for the proposed development.

85. In these terms, the proposal satisfies the relevant town centre policies relating to main town centre uses and the principle of hotel development at the site is therefore considered to be acceptable, in land use terms.

86. *DESIGN*

87. Policy CC7 states that all development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. This includes layout, landscape, density and mix, scale (height and massing) and architectural details.

88. The Policy further notes that development must make a positive contribution to RBC's urban design objectives. Developments should also respond positively to their local context, create safe and accessible environments, be inclusive and visually attractive.

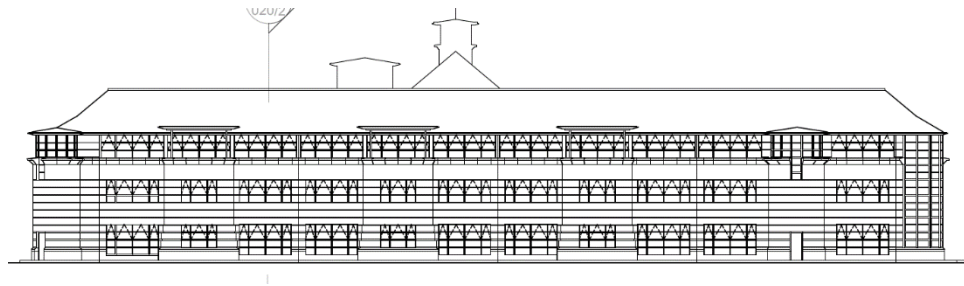
89. Policy CR2 is a specific design policy for the Central Area and notes a number of attributes that development should follow including respecting the existing grid layout structure; providing appropriate public spaces, where possible, include ways of providing green infrastructure; use of high quality materials and incorporation of architectural detailing; and designed with consideration for the future development of neighbouring sites.

90. Policy CR3 encourages new development to make a positive contribution towards the quality of the public realm of the Central Area.

91. The proposed development seeks to deliver a new aparthotel providing 100 rooms by adding a third and fourth floor over the existing building's three floors (ground plus first and second floors). The footprint is designed in the form of the letter 'H' with the proposed new storeys following this footprint.
92. The accompanying Design and Access Statement (DAS) outlines the general design approach for the hotel, including a site analysis and identification of constraints and how materials selected for the building have been chosen.
93. The design has been guided by design panel comments made in relation to two refused Class O Prior Approval schemes (220778 and 221479).
94. Limitations within the prior approval legislation meant that the applicant was unable to propose changes to the external appearance of the existing building as part of the previous schemes. Consequently, this was considered to result in an unbalanced appearance which the design panel were unable to support.
95. Whilst the design panel were not supportive of the previous prior approval schemes, all members of the panel agreed that in their view the site could accept additional height, providing the design approach was sympathetic to the existing building.
96. In this planning submission, the applicant's design team design have sought to address the panel's comments on both massing, design and materials to provide a harmonious extension to the existing building.
97. The proposed scheme reduces the overall height and massing compared to the previous scheme. This is achieved through providing the fourth-floor accommodation within the roofspace, maintaining a broadly similar form to the existing roof form. This enables a reduction in scale and mass and helps preserve the building's character and appearance.

98. The design approach seeks to respect the existing building and create a seamless addition to it. The extension would incorporate similar materials as the existing building as well as incorporating certain architectural features from the existing building, such as the side bays.
99. The design seeks to remodel the hierarchy of materials progressing up the building to retain the existing balance. To achieve this the existing glazed 'top' floor has been transferred up the from second floor level to the proposed third floor. The design progression is set out on the following pages.
100. The materials proposed at second floor would be specified to match the brick below. The proposed third floor would replicate the lightweight glazed appearance currently at second floor, therefore there will be no increase in the amount of glazing compared with the existing top floor of the existing building.
101. The roof is proposed to be finished in grey tiles with zinc junctions and aluminium rainwater fittings. The proposed external design is considered to respect the design and architectural features of the existing building and responds appropriately to the character and detailing of the side and front/rear elevation. In terms of massing,
102. The existing building occupies a large footprint which is considered to lend itself well to the proposed additional height, without the extension appearing disproportionate. The proposed additional height along with the sympathetic design is considered to not only respect the existing build but also improve its overall proportions relative to its footprint.

103. East elevation:



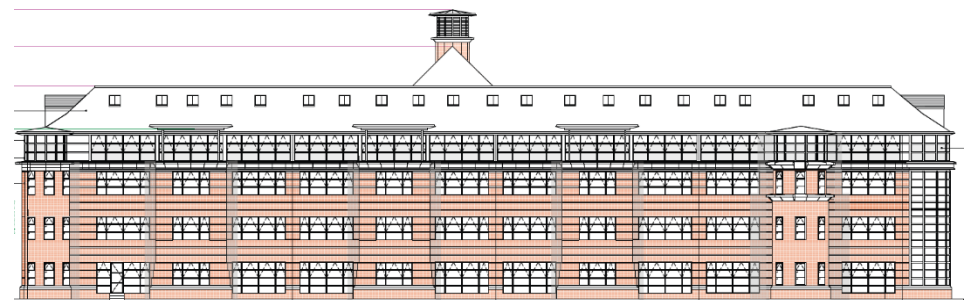
Existing



220778

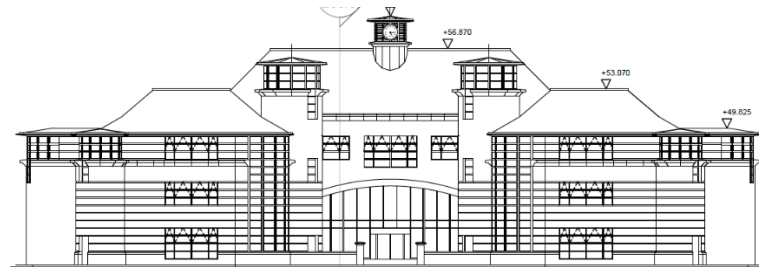


221479



Proposed

104. South elevation:



Existing



220778



221479



Proposed

105.NEIGHBOURING AMENITY

106.Residential amenity is assessed against Policy CC8 which requires developments to not cause a detrimental impact on the living environment of existing properties in terms of: Privacy and overlooking; Access to sunlight and daylight; Visual dominance and overbearing; Harm to outlook; Noise and disturbance; Artificial lighting; Vibration; Dust and fumes; Smell; and Crime and safety.

107.*Sunlight & daylight*

108.The proposed scheme has been carefully designed in response to the daylight assessment to respect the residential amenity of surrounding dwellings and to ensure that the residential amenities of future residents are also respected.

109.The application is supported by a Daylight Sunlight assessment which considers the amenity of surrounding residential properties including their amenity spaces and assess these against guidance provided by the BRE (BR209: Site Layout Planning for Daylight and Sunlight 2022).

110.The site adjoins residential uses to the north, east and west. The DS report assesses the following properties:

- 106 Caversham Road
- 1-9 Brigham Road (& Brigham Mews)
- Regents Riverside
- 1-31 De Montfort Road
- 17 Vastern Road
- West of Caversham Road

111.It should be noted, in terms of daylight and sunlight, the previous schemes were acceptable with respect to BRE's guidance. Notwithstanding, following the specific design feedback received on the previous prior approval schemes, the massing

has been reduced by providing fourth floor accommodation within the rebuilt roofspace, reducing the building's massing and height and therefore improving the perceived scale of the proposal.

112. The results of the daylight assessment indicate that all of the assessed neighbouring windows would meet the BRE guidance. Where windows have not met the 25° test, these have been shown to retain a VSC of 27% or not less than 0.8 times their former level. Thus, the reduction in daylight levels to these windows would not be noticeable according to the BRE guidance.

113. In terms of Annual Probable Sunlight Hours (APSH), the results of the sunlight analysis indicate that the assessed windows have been shown to pass both the APSH tests (annual & winter).

114. The analysis shows that more than half the area of the amenity spaces of neighbouring properties would receive at least 2 hours of sunlight on 21st March.

115. The values of daylight levels and annual sunlight hours are thus considered to be acceptable for all surrounding properties, according to the BRE guidance.

116. *Overlooking*

117. With respect to privacy, Local Plan Policy C8 indicates that *“back-to-back distance of 20 metres between dwellings is usually appropriate, although the circumstances on individual sites may enable dwellings to be closer without a detrimental effect on privacy.”*

118. Proposed window-to-window distances are greater than 25m. As such, there would be no material harm to existing neighbours as a result of the two additional floors of accommodation. To the north the distances increase to 30-40m.

119. Potential overlooking from the east and west sides of the building is further reduced through specification of obscure glazing up to eye level on the east and west elevations. Additionally, there are no east or west-facing balconies facing the site boundaries.

120. At roof level the dormers are high level and set back from the eaves. This substantially limits potential for overlooking. The higher-level position of the third and fourth floor windows also further increases distances compared to the approved flats located at lower levels in the building.

121. It should also be noted that the existing mature trees planted along the western boundary obscure direct views to and from the site from the street. To the east, there are also trees planted in rear gardens which offer some screening benefits.

122. *Harm to outlook*

123. Given the reduced massing proposed by this scheme, it is not considered that the additional proposed development would have any material impact on the existing outlook from neighbouring properties.

124. Although harm to outlook is not measured by BRE, VSC assessment offers a useful guide. This existing building is currently visible from all sides, although somewhat obscured by trees and vegetation. There are no direct views through the site, only views over the building towards the sky.

125. It should be noted that the development does not breach the 25-degree rule for properties located to the north and south, demonstrating that VSC analysis is not a BRE requirement for these properties.

126. From the east and western properties, the impact on VSC has been assessed and these properties all meet BRE requirements. Please refer to the Daylight Sunlight report for further details.

127. Amenity of prospective residential occupiers within Great Brighams

128. The proposal has been designed from the outset to ensure that the residential amenity of prospective residents at ground, first and second floor level would be not harmed by the operation of the hotel on the upper floors.

129. Measures to protect residential amenities include the following:

- A separate branded entrance and enclosed lobby at ground level for hotel users
- Separate lifts for hotel and residential users
- Separate staircases to upper floors for hotel users
- Clear designated branded signage throughout to define the separate uses
- High specification acoustic separation between hotel upper floors and residential lower floors.

130. Hotel deliveries will be kept to a minimum, with no more than one per week given there are no food and beverage facilities within the hotel. In terms of waste, 90% of the waste the hotel produces will be recyclable allowing waste collection will also be kept to a minimum.

131. *LANDSCAPE IMPACT AND TREES*

132. As confirmed previously, the site sits within, albeit on the periphery of, a Major Landscape Feature (MLF) (Thames Valley), where Policy CS37 advises that planning permission will not be granted for any development that would detract from the character or appearance of a designated Major Landscape Feature.

133. Supporting text provides further clarification. This states that “*New development should seek to maintain and enhance the natural beauty and visual amenity of the Borough’s open space and landscape areas. Development resulting in the loss of existing landscape features or detracting from the character or appearance of the Borough’s major landscape areas will be resisted. The extent to which new development prevents or lessens the visual impact on major landscape features and other landscape values is largely dependant on the location, design and scale of proposals*”.

134. The Thames Valley MLF effectively follows the River Thames corridor and open space contiguous with the River. The obvious anomaly with this designation is the inclusion of the Fry’s Island Boat House and Bowls Club which clearly do not comprise open space or represent a landscape feature.

135. To this extent, it must be acknowledged that the application is located approximately 50m outside of the MLF’s southern boundary. The site is located fully within Reading’s urban environment. Very limited glimpses of the application site are visible from the northern banks of Thames across the MLF however from these views. These views are identified below:

136. The above views demonstrate the existing building is barely visible from the northern banks of the Thames.





137. From the above photos, the clock tower and partial roof form of Great Brighams Mead are just visible in amongst the urban environment on the southern side of the River Thames MLF. The views from the north demonstrate the surrounding development varies in height and scale, especially in the foreground where dense residential development lines the banks of the Thames.

138. Furthermore, extensive tree coverage on the southern banks of the Thames and Fry's Island obscures the most direct views to the application site.

139. Even with the proposed additional storeys, the development would not be out of character with the scale of the surrounding urban environment along the southern banks of the Thames when viewed from the north. As such there would be no material impact upon the character or appearance of the designated MLF, and any associated natural beauty, visual amenity or landscape features.

140. Regarding tree on the application site, the site is situated in a low canopy cover area, within the AQMA and all Plane trees along the south (frontage) and west boundaries are protected by TPO 80/05.

141. As the proposed extension is at second floor level, there would be no direct impact on trees around the site.

142. Consistent with application 220717/FUL, an informative advising that 'any other works affecting trees or tree route areas during any construction and storage are likely to require additional permissions' would be appropriate.

143. ACCESS AND TRANSPORTATION

144. Policy CC6 sets out that the scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest development taking place in the most accessible locations.

145. Policies TR1 (Achieving the Transport Strategy), TR3 (Access, Traffic and Highway-Related Matters) and TR5 (Car and Cycle Parking and Electric Vehicle Charging) seek to address access, traffic, highway and parking relates matters relating to development.

146. Policy TR3 states that in determining proposals involving 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 it would not have a material detrimental impact on the functioning of the transport network.

147. Policy TR4 sets out 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.

148. Policy TR5 states that development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport. Further details in

relation to parking are set out within RBC's Revised Parking Standards and Design SPD.

149. The NPPF highlights that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes (Paragraph 103).

150. The application site is located in Zone 2, Primary Core Area, of the Revised Parking Standards and Design SPD. This zone directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading. The site is well served by public transport, with buses continuing either into or out of the Central Core Area via this zone.

151. The accompanying Transport Statement (TS) for the application fully appraises the existing transportation conditions and the likely impact of the proposed development, within the context of relevant national guidance and local planning policy.

152. The TS confirms that the site is in a highly accessible location in Reading due to the availability of footways and cycle routes in the vicinity of the site and its proximity to a comprehensive network of public transport services, which can be accessed from Reading Railway Station and bus interchange immediately north of it, and from Caversham Road adjacent to the site and Friar Street in Reading Town Centre.

153. Reading Rail Station is located approximately 350m (5-minute walk) to the south east of the site, via Vastern Road and Trooper Potts Way. Reading station is situated on the Great Western Main Line, which provides access to key destinations including London Paddington and London Waterloo, as well as local services to Newbury, Swindon, Oxford, Basingstoke and Twyford. A summary of typical services, frequency and journey time are provided in the Transport Statement.

154. In addition to mainline rail, the Elizabeth Line delivered by Crossrail, provides high-frequency suburban passenger services between Reading and Heathrow in the west and Shenfield and Abbey Wood in the east, via central London.
155. The site is also within easy reach, by foot, to Reading Town Centre providing an excellent range of facilities and services including the Oracle Shopping Centre, Broad Street Mall, Christchurch Meadow Park and King's Meadow Park.
156. The TS sets out the access, parking and servicing arrangements proposed for the new hotel.
157. Car parking provision for the site will be 152 spaces. The serviced apartments will be allocated 34 bays, two of which will be accessible spaces and 14 will have electric vehicle charging points. This provision aligns with RBC's standards, considering its location between zones 1 and 2 set out in RBC's parking standards. Eight cycle parking spaces will be provided to the staff.
158. Bins within the bin store will be moved by a Facilities Management team that will be available on-site to the proposed bin collection area for collection by RBC.
159. It is forecast that the permitted residential development and serviced apartments development would generate 136 two-way people trips in the AM peak hour and 140 two-way people trips in the PM Peak hour. This represents a net reduction of 30 and 8 two-way people trips in the AM and PM peak hours, respectively, compared with the people trip generation associated with the existing office development.
160. In respect of the relevant highways policy matters it is considered that the proposals would have no detrimental impact on the local highway network as a result of the proposed development.

161. ENVIRONMENTAL CONSIDERATIONS

162. *Sustainability*

163. Policy CC2 'Sustainable Design and Construction' encourages proposals for new development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock to take account of the effects of climate change. Major non-residential developments are required to meet the most up-to-date BREEAM 'Excellent' standards, where possible. The policy also requires water conservation measures so that predicted per capita consumption does not exceed the appropriate levels set out in the applicable BREEAM standard.

164. Policy CC3 'Adaption to climate change' requires all developments to demonstrate how they have been designed to incorporate measures to adapt to climate change.

165. This application is supported by an Energy and Sustainability Statement which seeks to address the above planning policy requirements relating to sustainable construction and technologies that reduce overall impact on energy consumption.

166. The development has been shown to meet the national & local sustainability requirements. In addition to the policies identified above, these include the Reading Borough Sustainable Design and Construction Supplementary Planning Document (Adopted December 2019) and Building Regulations Part L requirements.

167. The report provides an assessment of the energy consumption and associated carbon dioxide emission reductions for the proposed development using predicted consumption data. It identifies the target amount of energy generation and carbon savings to be provided from decentralised energy and on-site renewable generation technology.

168. The assessment follows the energy hierarchy to firstly reduce the energy demand followed by incorporation of low energy lighting and efficient systems before incorporation of decentralised and renewable technologies.

169. The Report confirms that a 40% CO₂ reduction has been achieved, due to the 'fabric-first' approach and air source heat pumps providing heating and domestic hot water. The development avoids natural gas heating, aligning with the national requirement to eliminate gas boilers by 2025.

170. The BRE Water Efficiency Calculator Tool has been used to predict water usage for the proposed dwellings. A target of 110L/person/day has been proposed, which includes 5L/person/day for external water use. Whilst this target has not yet been adopted into local planning policy, the development will aim to meet this target (and will perform no worse than the Building Regulations requirement of 125L/person/day).

171. A BREEAM rating of 'Excellent' has been demonstrated (score 76.69%), in the attached BREEAM pre-assessment.

172. In respect of all sustainability and energy based matters, it is considered that the proposals are appropriate and policy compliant.

173. *Sequential Test*

174. The NPPF sets out the requirement for the Sequential Test and Exception Test in paragraphs 162 and 163 respectively – see below.

175. *"162. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach*

should be used in areas known to be at risk now or in the future from any form of flooding).

176. *If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3."*

177. Environment Agency (EA) Flood Zone mapping and modelled flood data shows that the site lies within Flood Zone 3a 'High Probability' (land at a 1 in 100 (1.0%) or greater annual probability of river flooding). The proposed third and fourth floor extension is considered 'More Vulnerable' development, which is appropriate in Flood Zone 3 subject to the Sequential and Exception tests being passed.

178. A sequential test was undertaken in respect to other suitable sites for a C1 use in proximity to the Central Core Area. As demonstrated earlier in this report, we are currently unaware of any sites located within the Central Core or in proximity to the CCA that would be in a sequentially preferable location and are currently available, suitable and viable for the proposed development. Through this assessment, it follows that within the CCA and its immediate periphery, there are also no suitable sites which would have a lower probability of flooding and are currently available, for the proposed development.

179. In short, we consider that it has been demonstrated that there are no reasonably available sites with a lower probability of flooding that would be appropriate for the type of development proposed.

180. The FRA submitted with this application covers the second part of the Exception Test and confirms that the proposed development is safe from flooding over its design life.

181. In summary, it highlights that the proposals are for the extension of the third and fourth floors of the Great Brighams Mead residential building, classified as 'More Vulnerable' as defined in Planning Practice Guidance (PPG) 'Flood Risk and Coastal Change' Table 2. 'More Vulnerable' development, is appropriate in Flood Zone 3a subject to the Sequential and Exception Tests being passed.

182. *Flood Risk*

183. Environment Agency (EA) Flood Zone mapping and modelled flood data shows that the site lies within Flood Zone 3a 'High Probability' (land at a 1 in 100 or greater annual probability of river flooding).

184. The main source of flood risk for the site is fluvial. The data shows the site is affected by flooding from the River Thames and it lies within Flood Zone 3 'High Probability'.

185. The remaining sources of flood risk are considered to be a low risk. National climate change guidance set out in the Planning Practice Guidance (PPG) confirms that the site conditions require consideration of an increase in peak river flow of +31% ('Central' allowance, Thames and South Chilterns management catchment, Flood Zone 3a, More Vulnerable development).

186. Flood data from the EA Thames 'Pangbourne to Sonning' 2019 model has been extracted around the site. This provides a present-day 1 in 100 (1.0%) annual probability flood level of 38.02m AOD, which affects the external site area to shallow depths.

187. The applicable climate change allowance for the site is +31% in the 2080s epoch (2070-2115), but the EA have undertaken modelling of a +35% allowance for climate change scenario. This scenario has been used as a conservative proxy for the applicable allowance. At the reference 1 in 100 annual probability +35%

allowance for climate change flood level of 38.37m AOD, external flooding is more significant around the site

188. The proposed mitigation strategy demonstrates the development is safe through a number of measures as follows: -

- Floor levels of the third and fourth floors are over 10m above the design 1 in 100 annual probability +35% allowance for climate change flood level;
- As a third and fourth floor extension, the scheme features no change to building footprint and no alterations to external ground levels. As such, there will be no impact on floodplain storage capacity or flood flow routes.
- As a third and fourth floor extension, the proposals will have no impact on the surface water drainage arrangements over the site
- Safe access is available during the present day 1 in 100 annual probability event. Provision of a 'Flood Risk Management Plan' will ensure that residents of the proposed development can receive sufficient warning to evacuate the site before flooding begins to affect the area in a more severe climate change scenario in accordance with the Reading Borough Council (RBC) Strategic Flood Risk Assessment (SFRA).

189. As the development is for the addition of a new floor comprising 2 flats above the existing building, the site impermeable surface around the site remains as existing. As such, the development has a neutral impact on the existing flood risk.

190. In conclusion, the future occupants and users of the proposed development will be safe from flooding and there will be no detrimental impact on third parties. The proposal complies with the National Planning Policy Framework (NPPF) and local planning policy with respect to flood risk and is an appropriate development at this location.

191. The proposal complies with the National Planning Policy Framework (NPPF) and Policy EN18 of the Local Plan with respect to flood risk and is an appropriate development at this location.

192. *Contamination*

193. The site is not on contaminated land and the proposed development will not present any contamination risks. The ground conditions have been assessed under recent application ref:210567 and considered acceptable.

194. Therefore, the report concludes that no significant risks are presented by the site for the redevelopment and change of use from commercial to residential, and there are no contamination risks as to why Prior Approval should not be granted.

195. The submission is supported by a Ground Conditions Assessment (Phase 1) prepared by Stantec, which considers the potential for contamination on the site. The report states that the preliminary ground instability assessment identified that all the ground stability hazards were rated as very low or low potential. The identified low risk has been dealt with through the adoption of piled foundations. Therefore, the report determines that the change of use for the building will not have a negative effect on the current foundation. The council has confirmed that the site has not been identified as statutory “contaminated land” under Part IIa of the Environmental Protection Act, 1990. The current and historical ground investigation is sufficient to assess the risk for redevelopment and further ground investigation is not considered necessary.

196. Therefore, the report concludes that no significant risks are presented by the site for the proposed use, and there are no contamination risks as to why planning permission should not be granted.

197.PLANNING OBLIGATIONS

198.Policy CC9 seeks to ensure that infrastructure made necessary by the development is direct provision or financial contributions.

199.LP Policy EN9 states that all new development should make provision for appropriate open space based on the needs of the development. It is noted that this can be achieved through on or off-site provision, contributions toward provision or improvement of existing leisure or recreational facilities.

200.LP Policy TR1 notes that all development proposals should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling.

201.RBC's has also published a Planning Obligations under S106 SPD which provides further detailed guidance.

202.The NPPF sets out that "planning obligations should only be sought where they meet all of the following tests:

- necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development."
- (Paragraph 56)

203.It is confirmed that the applicant would be willing to enter into a S106 agreement to secure financial and non-financial obligations providing they meet the tests as set out within the NPPF.

204.SUMMARY

205.This Planning Statement has been prepared on behalf of Kings Oak Miami LLP (the Applicant) in support of their Planning Application submitted for Great Brighams Mead, Reading 8DJ RG1, which seeks to create a third-floor and fourth-floor extension to provide 100 serviced apartments (Use Class C1).

206.The development has been sympathetically designed to complement the character and appearance of the existing building, with the design approach guided by the LPA's feedback on two previous schemes submitted under Class AA. As demonstrated by this statement and the supporting documents, the scheme complies with the relevant Development Plan policies and would have no material impact upon surrounding residential properties.

207.As set out in this statement and

- In terms of transport, the proposal would not result in any detriment to the operation of the local highway network and there are no transport or highways reasons why planning permission should not be granted for the scheme;
- There would be no impact upon the amenity of the existing neighbouring and neighbouring premises including overlooking, privacy and the loss of light;
- In terms of the flats approved under application ref. 210567, the proposed development would have no detrimental impact on these prospective occupiers as a result loss of daylight sunlight or through the operation of C1 use;
- The accompanying flood risk assessment demonstrates that the C1 use of the land would not have a material impact upon flooding or flood risk. It concludes that there is no flooding or flood risk reason why prior approval should not be granted.

208. It is therefore considered that the application proposals pass the tests set out in Section 38 of the Planning and Compulsory Purchase Act 2005, and that planning permission should be granted accordingly.