



Great Brighams Mead,
Vastern Road, Reading
RG1 8DJ

SEQUENTIAL ASSESSMENT (TOWN CENTRE)

June 2023

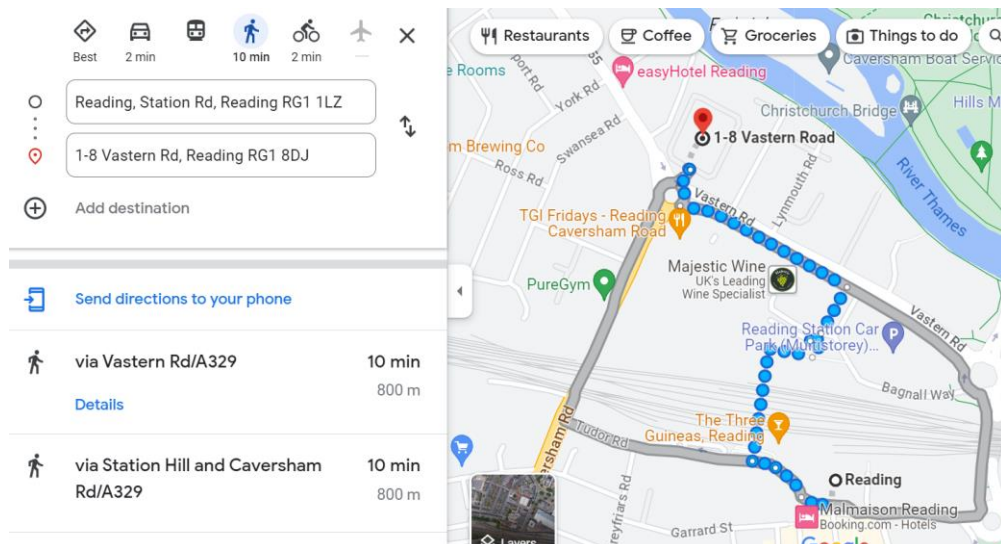
INTRODUCTION

1. This 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).
2. This assessment addresses the national and local planning policy tests applicable to main town centre uses that affect the development proposal, given it is located in a location outside of the Central Core Area of Reading.
3. The assessment methodology is provided within the following sections of this statement, along with detailed consideration of alternative sites which may be sequentially preferable, and assesses if they are their suitable, viable and available to accommodate the proposed development.
4. The site is within a flood risk area and as necessary a separate Sequential Assessment is submitted to support the proposed development in accordance with National Planning Policy Framework (2021) and the supporting Technical Guidance.
5. This statement should be read in conjunction with the documentation submitted in support of the planning application.

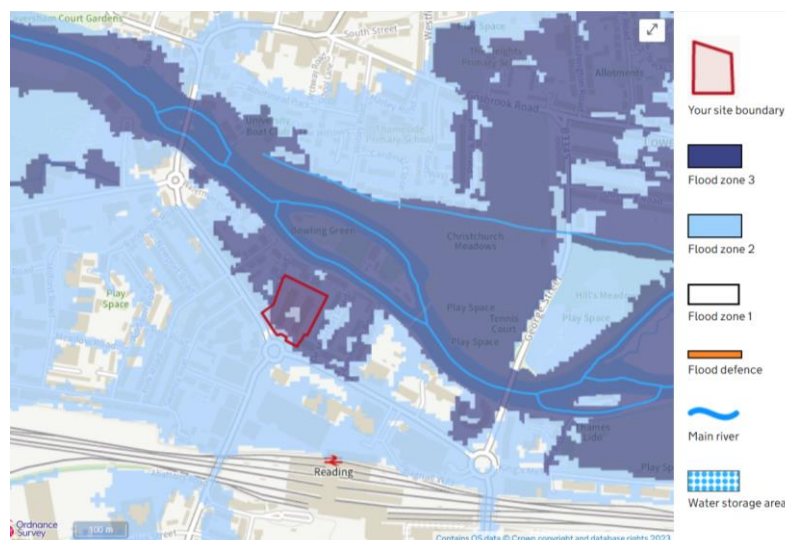
SITE DETAILS

6. 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.
7. The site comprises a three-storey office building called Great Brighams Mead with a part brick façade, a hipped roof.

8. 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.
9. Reading train station is located 800m south of the site and is approximately 10mins walk (see below).



10. The application building 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.
11. 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).



THE PROPOSAL

12. 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.”
13. 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.
14. 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.
15. 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
16. Vehicle and pedestrian access will remain as existing from Vastern Road.

POLICY CONTEXT

17. A review of national and local planning policy relevant to the consideration of the requisite town centre use policy tests has been undertaken and summarised below.

NATIONAL POLICY

18. The national tier of planning policy is set out within the National Planning Policy Framework (2021) ('NPPF') which is supplemented by the National Planning Practice Guidance ('NPPG') published in 2014 and updated in 2021.

19. The Presumption in Favour of Sustainable Development

20. At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

21. For decision taking this means:

- Approving development proposals that accord with the Development Plan without delay, and;
- Where the Development Plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - o Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against policies in the framework taken as a whole, or;
 - o Specific policies in the Framework indicate development should be restricted.

22. Ensuring the Vitality of Town Centres

23. Paragraph 86 advises that planning policies should be positive, promote competitive town centre environments, and enable the management and growth and adaption of centres over the lifetime of the Council's Development Plan.

24. In these terms, local planning authorities should recognise town centres as the heart of their communities and pursue policies to support their viability and vitality, whilst seeking to define a network and hierarchy of centres that is resilient to anticipated future economic changes.

25. At paragraph 87, it is confirmed that local planning authorities should apply a sequential test 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. Annex 2 of the NPPF provides a definition of main town centre uses, which includes tourism development (including hotels).

26. Annex 2 also provides a definition of 'edge-of-centre' stating that for all main town centre uses except retail, edge-of-centre is a location within 300m of a town centre boundary.

27. The sequential test will require development for main town centre uses to be located in town centres, followed by edge-of-centre locations and only if suitable sites are not available will out-of-centre sites be considered. When considering edge-of-centre and out of centre proposals, the NPPF confirms that preference should be given to accessible sites that are well connected to a centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.

28. The National Planning Practice Guidance

29. The National Planning Practice Guidance ('NPPG') provides specific guidance on ensuring the vitality of town centres. Paragraph 008 Reference ID: 009 Reference ID: 2b-009-20190722 states that the sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge-of-centre locations, and, if neither town centre locations nor edge-of-centre locations are available, to out of town centre locations, with preference for accessible sites which are well connected to the town centre.

30.Paragraph 011 Reference ID: 2b-011-20190722 states that the application of the test should be proportionate and appropriate for the given proposal. Where appropriate, the potential suitability of alternative sites should be discussed between the developer and local planning authority at the earliest opportunity.

31.Paragraph 012 Reference ID: 2b-012-20190722 of the NPPG states that the use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which means that they may only be accommodated in specific locations.

LOCAL PLANNING POLICY – ADOPTED

32.The Development Plan for RBC comprises the Reading Borough Local Plan (RBLP), 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.

33.The RBCLP is accompanied by a Proposals Map, which shows the geographical extent of policies in the plan.

34.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.



Site in relation to the Central Area (black line) and the Central Core (pink line)

35. 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.

36. RBLP 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.

THE SEQUENTIAL TEST

THE SEQUENTIAL APPROACH

37. National and local policy requires that the sequential approach to site selection should be applied to all development proposals for main town centre uses that are not in-centre and not in accordance with an up to date development plan.

38. Annex 2 of the NPPF provides a definition of main town centre uses, which includes tourism development (including hotels). The Annex also provides a definition of 'edge-of-centre' stating that for all main town centre uses except retail, edge-of-centre is a location within 300 metres of a town centre boundary.

39. Given that an edge-of-centre location for main town centre uses excluding retail, is 300 metres from the town centre boundary (the 'Central Core' in this instance), it is clear that an in-centre location for such uses is anywhere within the town centre boundary (rather than the primary shopping area).

40. The application site falls approximately 50 metres from the Central Core Area boundary.

METHODOLOGY

41. NPPG further identifies the considerations (011 Ref. ID: 2b-011-20190722) which should be taken into account when determining whether a proposal complies with the sequential test, based on the following:

- Has the suitability of more central sites to accommodate the proposals been considered, having regard to flexibility?
- Is there scope for flexibility in the format and/or scale of the proposal?
- If there are no suitable sequentially preferable locations, the sequential test is passed

42. NPPG confirms that the use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification must be provided where this is the case, and land ownership does not provide such a justification (012 Ref ID: 2b-012-20190722).
43. In addition, the NPPG recognises that, although the sequential test seeks to deliver the government's 'town centre first' policy, promoting new development in town centre locations can be more expensive and complicated than building elsewhere. Therefore, local planning authorities need to be realistic and flexible in terms of their expectations (ref: ID 2b-012-20140306).
44. Building on these considerations, it is firstly important to define the catchment area for the proposed development. The applicant has identified market demand for a hotel within the centre of Reading and within walking distance of the railway station. Given the site's very close proximity to the Central Core Area, it is considered that only sites located within the Core Central Area would be sequentially preferable sites.
45. The application of the sequential approach to site selection, including the consideration of sites that may be considered suitable and available, must also fully understand, and have regard to the occupier's operational and commercial requirements including timescales for delivery of the proposals.
46. The scheme proposes a two storey roof top extension to provide hotel with 100 hotel rooms and is considered appropriate to serve market demand in this location. The size of the site needed to accommodate the scale of development proposed will vary depending on the number of storeys the site could feasibly accommodate, shape, access and servicing arrangements and topography. Any potential site must also be of an adequate size to accommodate the hotel with dedicated parking provision and ancillary facilities along with a visual presence from a main road.

47. On this basis, having regard to flexibility, the minimum site area used for the purposes the assessment is 0.5 hectares, given the lower parking requirements required inside in parking Zone 1.
48. This site size threshold has been adopted to ensure a robust assessment.
49. The construction methods employed by the applicant are also relevant to the sequential assessment. As the proposed development is located above an existing building which is within the applicant's ownership, this is a consideration for the area of the potential site found to be sequentially preferable. The applicant also has experience in creating new development above existing buildings which is key to the draw of application site. The application site is not listed and not within a conservation area which is also a consideration in terms of viability and feasibility for proposed roof-level extensions.
50. In addition, to ensure deliverability, the site should also be available on a freehold basis for purchase by the applicant and available for development within the next 6 months.
51. The site selection process has been undertaken with this in mind and a pragmatic and flexible approach has been applied to ensure that the assessment can be considered robust.

Parameters

52. The following parameters have been used to guide the scope of the sequential assessment.
- **Area of search:** The applicant has identified market demand for a hotel within Reading's central area in very close proximity to the rail station and the central amenities enabling hotel visitors to utilise the town centre for leisure and work purposes. As the site is located in the Central Area, immediately adjacent to the Central Core Area (50m from the boundary), only sites located within the Central Core Area of Reading would be considered sequentially preferable to the

application site. Therefore, the search for alternative sites will concentrate on sequentially preferable sites that are within the Central Core Area of Reading.

- **Flexibility:** The proposed scheme comprises a two-storey extension to an existing building to provide 100 rooms. It is considered appropriate to serve market demand in this location. The number of rooms is not flexible in this instance in the context of the applicant's commercial requirements, however, having regard to flexibility, it would be possible in theory to vary the size of the site needed to accommodate the scale of development depending on the number of storeys the site could feasibly accommodate.
- **Site parameters:** Any potential site must also be of an adequate size to accommodate the proposed hotel with car and cycle parking provision, in accordance with the Council's maximum standards, along with a visual presence from a main road. Reading has different maximum parking standards for Zone 1 and Zone 2 owing to the availability of transport links within the Central Area and Central Core Areas and the need to discourage on-site parking. On the basis that the subject site comprises 1.0 hectare and is located in Zone 2, sites within Zone 1 would need to comprise between 0.5 and 1.0 hectare, having regard to the requirement for reduced car parking.

53. In summary, the following parameters are proposed for this sequential assessment:

- A location within, Reading's Core Central Area.
- A minimum site area of 0.5 hectares;
- Prominent roadside location; and
- A topographically flat site.

54. 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. The site is less than 800m or 10 mins walk from Reading railway station and is therefore easily accessible for prospective guests.

SEQUENTIAL ASSESSMENT

55. The Sequential Test has been undertaken in accordance with NPPF and NPPG guidance and requirements, to establish if any sites are available that would be sequentially preferable to the application site. The Sequential Assessment follows the process below: -

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 the development would be viable on the site.

56. A desktop search of potentially preferable sites to the application site in terms of town centre location has been undertaken. As part of the Sequential Test, we have reviewed the RBC Local Plan (2019) and evidence base, as well as searches for available land via marketing search engines in order to compile a selection of sites for assessment.

57. Allocated sites that have been assessed include:

- Reading Prison (Adopted Site)
- Land to the North of Station
- Land Hosier Street

58. Searches for development land and commercial premises on the following property websites have also been undertaken.

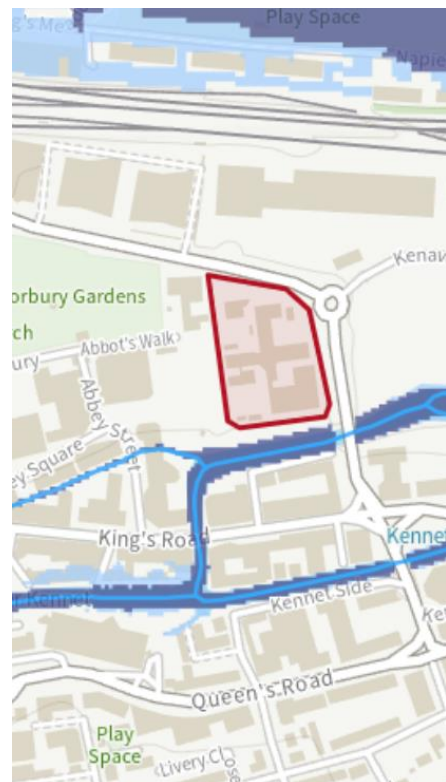
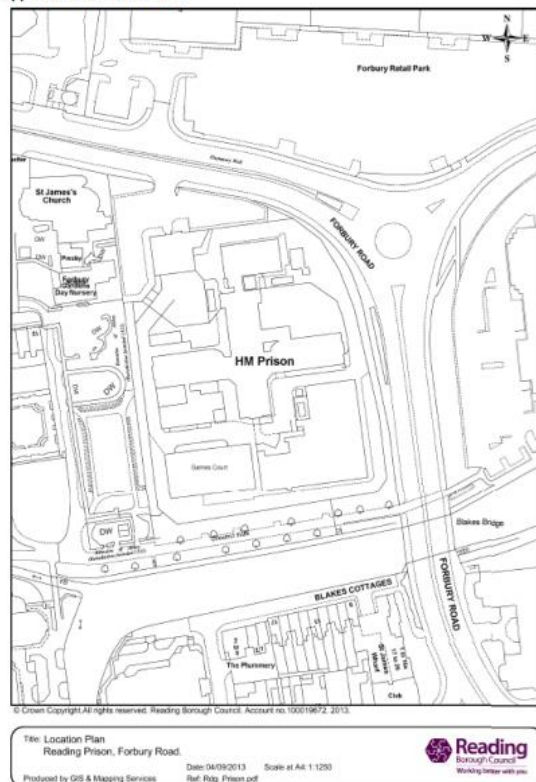
- <https://www.loopnet.co.uk/>
- <https://search.savills.com/>
- <https://www.knightfrank.co.uk/>
- <https://www.rightmove.co.uk/>

59. Given the lack of relevant results returned from the property websites, the search area was widened to the boundary Reading Borough, although this revealed no further sites within the Central Reading Area which are actively being marketed and that fell within the search parameters.

60. An assessment of the sites which fit the criteria are listed below.

Reading Prison (Adopted Site)

Appendix 1: Location Plan



Site Plan and EA Flood Zone extracts

61. The site is located within the northeastern corner of the Central Core boundary and comprises the former Reading Prison, a cross-shaped building dating from the early 1840s with 1970s modern extensions to the north and southeast. The Prison is Grade II listed and is of considerable historic sensitivity. The LP plan allocation (ref.

CR13a) is for student accommodation, although possible future uses are kept flexible given the challenges involved with conversion.

62. The prison site is understood to be owned by the Ministry of Justice and was closed in 2013. It has been on and off the market for approximately 10 years and is understood to be available following a failed bid by RBC for mixed-use development.

63. As the site is located within the Central Core Area, it would fit the applicant's preference for a central location for hotel use.

64. The site is understood to be available, although not being actively marketed as far as we are aware. Whilst the site may be available, it is not considered to be achievable to deliver a hotel proposal for this site within the timescales the Applicant is working towards for the various reasons discussed below.

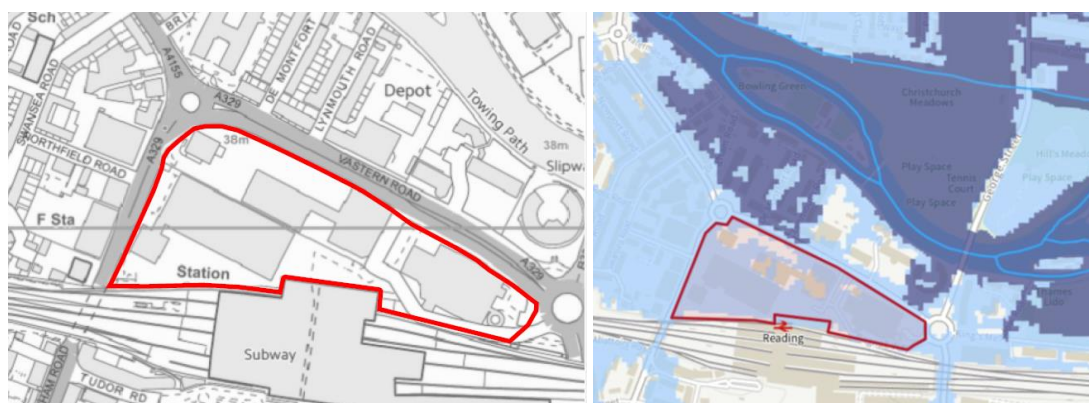
65. The site is considered to be suitable for hotel development given it is located within a town centre location. Given the size of the site, the proposed hotel use would need to be brought forward alongside other uses as a part of a much larger mixed-use development. Whilst a hotel development is compatible with other town centre uses, including residential, the application site offers the applicant the opportunity to deliver a hotel in the short term as opposed to being tied in with a larger mixed-use development that may or may not be feasible in the medium to long term.

66. The site is not considered a viable option for the proposed development given its much larger scale of the site compared to the proposed hotel development. There are also limitations to the proposed development presented by the structure and layout of the existing listed building and the complex heritage constraints.

67. The prison building is understood to have the capacity for approximately 300 homes, which demonstrates that it is too large to accommodate a development of 100 hotel rooms. A part-development of a hotel may be possible however this has the potential to prejudice the comprehensive conversion of the site for residential uses.

68. Given the statutory listing of the site, demolition and redevelopment would not be supported and extending the building at roof level is unlikely to be supported either due to the site's heritage significance. It is therefore considered that the site would be unviable for the scale of the hotel proposed by the applicant.
69. For these reasons, the site is dismissed as being sequentially preferable for the proposed development.

Land North of Reading Station



Site Plan and EA Flood Zone extracts

70. The site allocation is located to the north of Reading Station and extends to 16 acres (6.7 ha) in size and is bound to the north by Vastern Road, to the south by Reading Station, to the east by a roundabout at the junction of Vastern Road and Bagnall Way, and to the west by Caversham Road.
71. The existing allocated area is comprised of the Vastern Court Retail Park and associated car park along the site's northern boundary, the Reading Station Multi-Storey Car Park within the eastern section of the allocated area, which is accessed from the roundabout at the junction of Vastern Road and Bagnall Way, and a former sorting office within the south western section of the site allocation, to the south of the retail park. The former sorting office was temporarily used by Network Rail whilst works are carried out to Reading Station; following the temporary use, it is

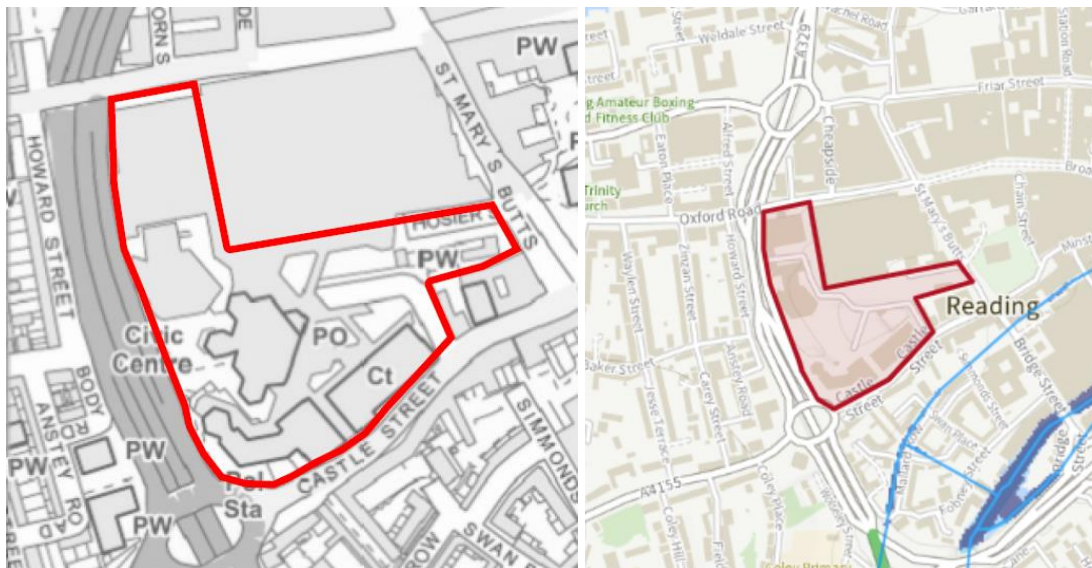
understood that 620-home development which includes a 24-storey tower has been approved.

72.The allocated area forms part of the Station/River Major Opportunity Area, which is broken down into sub-areas, which are accompanied by a specific development strategy.

73.The vision for this area is described as “a flagship scheme, extending the centre and providing a mixed-use destination in itself and centred on the new station and public transport interchange. It will integrate the transport links and areas northwards towards the River Thames and into the heart of the centre”.

74.As planning permission has been granted for a comprehensive redevelopment of this area, the site is no longer considered to be available.

75.Hosier Street



Extract Plan and Flood Zone 1 extract plan

76.The site allocation is located to the north of Castle Street and is bound by Hosier Street to the north (with Broad Street Mall beyond), St Mary's Butts to the east,

Castle Street to the south and the A329 to the west. The allocated area extends to 8.4 acres (4 ha) in size and is located within parking zone 1.

77. The Site is located within Flood Zone 1.

78. The site allocation forms part of the West Side Major Opportunity Area, which is broken down into sub-areas A-E, each of which is accompanied by a development strategy. The Hosier Street site allocation is an L-shaped area identified as sub-area E within the West Side Major Opportunity Area.

79. The site is currently occupied by various existing buildings including Reading Police Station, Reading Magistrates' Court and the Hexagon Theatre, with associated underground car parking. The Pentahotel Reading and recently constructed Queens Court Student Accommodation are located within the northern section of the site, to the west of Broad Street Mall. The allocation excludes an area of the south eastern section of the site to the north of Castle Street and to the west of St Mary's Butt, which is occupied by numerous Grade II listed buildings including the Sun Inn, 10 & 12 Castle Street, 8 Castle Street, the Horn Inn, 35 & 37 St Mary's Butts and the former cottage at the rear of No.8, in addition to the Grade II* listed Church of Saint Mary.

80. The vision for this area is to be "a mixed-use extension to the west of the centre containing high-quality mixed-use environments and fostering stronger east-west links into the central core". The Council's vision for development of the sub-area aspires to create a north-south 'key movement corridor' between the Police Station and Magistrates Court, and an east-west 'key movement corridor' between St Mary's Butts and the A329. The corner of St Mary's Butts and Castle Street is identified in the key diagram as a 'nearby sensitive location – heritage assets'.

81. The site allocation description states, "*Development on this site will result in a new residential community centred around an improved area of public open space and a high quality environment, with an improved entrance to the site from St Mary's Butts. The edges of the open space will be activated with retail, leisure and/or other*

main town centre uses such as hotel use, and development may also include some limited offices uses. The Hexagon theatre will only be developed if a replacement facility for Reading is provided, and approaches to the theatre will be improved. Development will also include a replacement site for the street market. The car parking below ground level will be retained and incorporated into the development.

82. *Site size: 3.41 ha. Indicative potential: 500-750 dwellings, 4,000-6,000 sq. metres retail and leisure."*

83. Although the allocated site area extends to 3.41 ha in size, the developable area is acknowledged to be considerably smaller given the existing uses on the site, and particularly if the Hexagon Theatre remains in this location. According to news reports from early 2017, the police station site may be released for redevelopment following a potential relocation of the police force to an alternative site in Three Mile Cross. Thames Valley Police have previously stated that the existing Castle Street facility is too large for the current operation. However, no further details of the timing of the release of the site are currently available. In any case, it is not likely to come forward in the short term.

84. Furthermore, at the present time, no individual parcels of land within the allocated site, including the Magistrates Court site, are actively marketed for sale. Notwithstanding the availability of land within the allocated site, however, in general, there are no areas within the allocated area considered to be suitable for proposed hotel development. This is primarily, due to the lack of an available site with good visibility from a main road, given that the areas adjacent to existing main roads are occupied by existing buildings and underground car parking.

85. Furthermore, the development of a standalone hotel comprising 100 rooms is likely to prejudice the comprehensive redevelopment of the wider site in line with the framework's vision.

86. In addition to being unsuitable for the development, the need to undertake costly land assembly and significant demolition, in addition to new access arrangements, would render the proposed development unviable on this site.
87. Although the site is located in a preferable location, being inside of the Core Central area and with respect to flood risk, for the reasons outlined above, the allocated site (including individual parcels within the allocated area) is dismissed as being sequentially preferable for the proposed development.

SUMMARY

88. At the time of this submission, we can conclude that there are no sites located within the Central Core that can be considered sequentially preferable when compared to the application site, either due to their availability, size, configuration and inability to be delivered viably, having regard to the guidelines for sequential assessments.
89. On the basis of the foregoing, it is considered that the site passes the Sequential Test in accordance with the guidance contained within the NPPF and its Technical Guidance.