



Planning, Design and Access Statment

Client:

Maj Chima

Tower House Hotel

70-78 Wokingham Road, Reading RG6 1JL

Demolition of hotel and erection of 14 apartments.

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CIL | Enforcement | Land Promotion | Planning | Sequential Tests | Viability

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1. Introduction

- 1.1 This statement is produced to support a planning application for the demolition of the Tower House Hotel at 70-78 Wokingham Road, Reading RG6 1JL and the redevelopment of the site to provide 14 flats.
- 1.2 This planning statement will cover the background to the application and provide the necessary information to enable its determination by officers at the Council. It will consider the proposal in light of relevant planning policies and other material considerations. The conclusion reached is that key material considerations and the wider objectives of National and Local planning policy support the grant of permission.
- 1.3 In addition to this planning statement, the application is accompanied by the appropriate planning application forms and ownership certificate, duly signed and completed, and the following plans prepared by The Keen Partnership:
- PL-01 Location Plan
 - PL-02 Topographic Survey
 - PL-04 Existing Ground Floor
 - PL-05 Existing First Floor
 - PL-06 Existing Second Floor
 - PL-07 Existing Roof Plan
 - PL-08 Existing Elevations
 - PL-09 Proposed Site Plan
 - PL-10 Proposed Ground Floor Plan
 - PL-11 Proposed First Floor Plan
 - PL-12 Proposed Second Floor Plan
 - PL-13 Proposed Third Floor Plan

- PL-14 Proposed Elevations
- PL-15 Proposed Street Scene

And the following documents:

- Transport Statement prepared by Motion
- Bat survey prepared by The Ecology Co-op Environmental Consultants
- Air Quality Assessment prepared by Accon UK Environmental Consultants
- Noise Assessment prepared by Accon UK Environmental Consultants

- 1.4 The relevant application fee of £6,468 will be submitted by the applicant separately.

2. Site Location and Description

- 2.1 The site is located on the western side of Wokingham Road, opposite Palmer Park. It is occupied by the part two, part three storey Tower House Hotel. The Hotel comprises 33 bedrooms and a restaurant/bar area at ground floor for patrons of the hotel.
- 2.2 The prevailing character of the surrounding area is residential with some commercial uses. The site is close to Reading University and the Town Centre.

3. Planning History

- 3.1 The following planning history is relevant to the site:
- 3.2 Application Ref 991637: Erection of second storey to hotel to form 4 additional bedrooms, and fire escape from bridge – Determined 1999.
- 3.3 Application Ref 990782: Second floor extension – Refused 2000, Appeal determined 2000.

- 3.4 Application Ref 021361: Erection of two single storey front extensions for enlarged bathroom and shower room – Determined 2002.

4. Development Proposals

- 4.1 The National Design Guide (2019) identifies that “well-designed homes and buildings are functional, accessible and sustainable. They provide internal environments and associated external spaces that support the health and well-being of their users and all who experience them. They meet the needs of a diverse range of users, taking into account factors such as the ageing population and cultural differences. They are adequate in size, fit for purpose and are adaptable to the changing needs of their occupants over time” (para 120-121).
- 4.2 Regarding the requirements of NPPG Paragraph: 029 Reference ID: 14-029-20140306 in respect of Design and Access Statements, the proposal is described as follows:
- 4.3 **Use and Amount:** The proposal is for 14 flats, in Use Class C3. These would comprise 5 x 1-bed flats; 8 x 2-bed flats; and 1 x 3-bed flats.
- 4.4 **Layout and Scale:** The proposed apartments will be split between two buildings, fronting Wokingham Road. The two buildings will each be three storeys in height, with the northernmost building being taller than the southern building to reflect the surrounding building heights.
- 4.5 The buildings also reflect the build line of the neighbouring buildings, ensuring that they sit comfortably in the street scene.
- 4.6 The apartments have been laid out to maximise the outlook from the main living/kitchen areas of the dwellings to the landscaped areas to the front and rear of the building.

- 4.7 **Scale Height & Mass:** The apartments will be split between two building, reflecting the existing building mass on the site and the plot width of properties in the vicinity. The buildings will each be three storeys, in keeping with the height and scale of the surrounding development.
- 4.8 **Landscaping:** The proposal includes landscaping around the buildings, including planting and communal amenity areas. The details of landscaping can be secured by condition.
- 4.9 **Appearance:** The proposed buildings will reflect the red brick and slate grey roofs characteristic of the immediate area, with gable and gable dormer features.
- 4.10 **Access & Parking:** The site will be accessed from the existing access on Wokingham Road. 14 parking spaces are provided to the rear of the buildings, accessed between the buildings.

5. Policy Assessment

- 5.1 **National Guidance:** The National Planning Policy Framework (NPPF) is a relevant material consideration to the application.
- 5.2 The purpose of the planning system is to contribute to the achievement of sustainable development. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. Paragraph 38 of the NPPF states that “Local planning authorities should approach decision on proposed development in a positive and creative way” and “at every level should seek to approve applications for sustainable development where possible”. Paragraph 119 of the NPPF comments that planning should “make effective use of land” in “meeting the need for homes and other uses, whilst safeguarding and

improving the environment and ensuring safe and healthy living conditions”.

- 5.3 Paragraph 60 confirms the Government’s objective to boost the supply of housing, and paragraph 8 identifies the three objectives of sustainable development, as economic, environmental and social.
- 5.4 Paragraph 126 identifies that “Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”, whilst paragraph 134 states that “significant weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”
- 5.5 The National Design Guide builds on the above, and clarifies that “well-designed neighbourhoods need to include an integrated mix of tenures and housing types that reflect local housing need and market demand. They are designed to be inclusive and to meet the changing needs of people of different ages and abilities. New development reinforces existing places by enhancing local transport, facilities and community services, and maximising their potential use” (para 109).
- 5.6 **Principle of Development:** Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.7 Policy CC1 of the Local Plan reflects the NPPF’s presumption in favour of sustainable development. The site is within the urban area of Reading, where development is acceptable in principle.

- 5.8 Policy H1 of the Local Plan references a shortfall in housing supply of 230 homes and the supporting texts states that sites for new development are limited. Paragraph 69 of the NPPF recognises the important contribution that small and medium sized site can make to the housing requirement of an area and that they are often built out relatively quickly. As such, paragraph 69 (c) states that local planning authorities should *“support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes”*.
- 5.9 The site therefore represents a windfall site that will make a contribution to the Borough’s Housing Land supply, supported in both local Policy and national policy.
- 5.10 The site lies in between the Cemetery Junction District Centre and Wokingham Road Major Local Centre; and close to the Regional Reading Central Area town centre. Paragraph 86 of the NPPF states that planning policies should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth and recognising that residential development often plays a key role in ensuring the vitality of centres and encourage residential development on appropriate sites. The principle of the provision of homes in this highly sustainable location close to local, district and regional centres is supported in local and national policy.
- 5.11 **Sustainable Development:** As set out above, the site lies on the Wokingham Road, close to Reading Town Centre, as well two smaller centres. It is approximately 160 metres, or a 1 minute cycle/3 minute walk to the Wokingham Road Major Local Centre to the south; and approximately 320 metres, or a 1 minute cycle/5 minute walk to the Cemetery Junction District Centre to the North. Further to the north, the site is approximately 800 metres, or a 4 minutes cycle/11 minutes walk from the boundary of the Reading Central Area. It is

therefore accessible by train and bus and has strong pedestrian and cycle links to Reading and the associated shops, facilities and services as well as wider public transport links. The site is therefore in a highly sustainable location.

- 5.12 **Loss of Hotel:** The site falls outside the Central Core of Reading, which is the prime focus for leisure, cultural and tourism development. Policy RL3 restricts the loss of 'centre uses' at ground floor within district, major and local centres. Hotel falls within the definition of centre uses. It is therefore significant that the site is not within a centre. Furthermore, the supporting text to Policy RL3 defines residential as a 'non-centre use'. This confirms that the redevelopment of the site from hotel use to residential is entirely appropriate in line with the aspirations of local policy and the spatial strategy for Reading.
- 5.13 **Density and Size of Dwellings:** The proposal includes a mix of dwelling sizes, including 5 x 1-bed apartments; 8 x 2-bed apartments; and 1 x 3-bed apartment. This represents a mix of units that is broadly in accordance with the aspirations of policy H2 and figure 4.6 of the Local Plan. While the proposal does not include a larger proportion of 3-bed apartments, which is the aspiration for out of centre sites, the site is close to a number of centres and is similar to a centre site in terms of its characteristics. Furthermore, all of the units meet the nationally described space standards in accordance with Policy H5.
- 5.14 The NPPF at paragraph 124 supports development that makes efficient use of land and, at paragraph 125, seeks to make optimal use of the potential of each site. The red line area of the site is 1,233 sq.m., equating to a density of 117 units per hectare. This is in line with figure 4.5 of the local plan, which indicates that 60-120 dwellings

per hectare is appropriate in urban areas outside of the town centre. The proposal therefore represents an efficient use of land.

- 5.15 **Character and Appearance of the Area:** Local Plan policy CC7 requires development to be of a high quality of design that maintains and enhances the character and appearance of the area. Development should respond positively to the local context and be visually attractive.
- 5.16 The existing Tower House Hotel is an anomaly in the street scene, comprising two brick and yellow painted buildings with a first floor white link. The surrounding development is characterised by red and grey brick and grey roofs, with gables fronting the road and gable dormers.
- 5.17 The proposed flats would be housed in two buildings, each constructed from red brick with grey roofs. They would have gable features fronting the road with gable roofed dormers to the front elevation. They would also have bay windows to the frontage at the ground and first floors, all of which are visible features on neighbouring properties. Furthermore, the spacing between the buildings ensures that the buildings reflect the surrounding plot pattern and rhythm which is currently disrupted by the link between the existing hotel buildings on site. The development would therefore fit seamlessly into the street scene while providing an individual high quality of design.
- 5.18 In terms of height, both buildings would be similar to the neighbouring buildings, with the building to the north being taller, to reflect the prevailing building height, demonstrated on the street scene. The building to the south would be stepped down in height, to fit comfortably into the street scene.

- 5.19 It is noted that the South Park Conservation Area lies to the West of the Site. As the site is separated from the Conservation Area by intervening residential development on College Road and Bulmershe Road, it is not considered that the proposal will impact on the Conservation Area. The proposed buildings are in keeping with the prevailing building heights and in any event, as set out above, the proposal has been carefully designed to improve the character of the area by removing the incongruous hotel and replacing it with a high quality development that reflects surrounding architectural characteristics.
- 5.20 Overall, the proposed development results in a betterment of the street scene than the existing hotel, replacing an anomaly with a high quality development that respects surrounding development, while preserving the special character of the nearby Conservation Area.
- 5.21 **Residential Amenity:** Local Plan Policy CC8 states that development will not cause a detrimental impact on the living environment of both existing and new residential properties. Of relevance to the application are impacts of privacy and overlooking; access to sunlight and daylight; visual dominance and overbearing effects of a development; harm to outlook; noise and disturbance; and artificial lighting.
- 5.22 As set out above, the proposed development has been carefully designed to reflect the prevailing plot pattern and building heights, ensuring that the development will not cause any issues in terms of visual dominance of overbearing effects. The buildings are in line with the frontages of neighbouring developments, with landscaping to the eastern edge and the rear of the site, ensuring space between the buildings and neighbouring properties and garden areas. The depth of the southernmost building has been reduced from the existing

hotel building, reducing its impacts on the neighbouring property, in particular in terms of outlook.

- 5.23 The orientation of the buildings and layout of the apartments are such that the primary windows to living spaces are to the front and rear of the properties, minimising any potential overlooking or privacy concerns. The proposal is not considered to impact on daylight or sunlight to neighbouring properties as the buildings replace an existing part two, part three storey building and the primary windows of the neighbouring properties are also to the front and rear of those properties.
- 5.24 The houses to the rear of the site front on to College Road. The removal of the unsightly existing hotel and link and its replacement with a high quality development, as well as the reduction in depth of the built form to the south, will result in an improvement on the outlook of the residents of those properties. Given the orientation and layout of the buildings, and the distance to the rear boundary, they would not give rise to overshadowing, loss of privacy or overbearing impacts to those properties.
- 5.25 The replacement of a 33 bedroom hotel with 14 apartments is considered to represent a reduction in terms of noise and disturbance due to the more permanent nature of the residents and the compatibility of residential development within a predominantly residential area. The proposed parking area will be solely to the rear of the buildings, accessed between them, rather than to the front and rear as in the current situation. Again, this reduces noise and disturbance by using one of the parking areas only. No external lighting is currently proposed and any such lighting can be controlled by condition.

- 5.26 Each apartment meets and exceeds the nationally described space standards, ensuring a high quality of living accommodation for future occupants. A communal amenity area is proposed to the rear of the dwellings. The position of this away from the road will encourage future occupiers of the apartments to make use of the space. Furthermore, the proposal maximises the opportunity of outlook on Palmer Park, opposite the site.
- 5.27 The proposed development therefore provides a high standard of living accommodation for future occupiers of the apartments while retaining and improving the amenity of neighbouring residential occupiers.
- 5.28 **Noise and Disturbance Impacts to the Proposed Development:** The NPPF, at paragraph 185, seeks to minimise adverse impacts from new development resulting from noise and paragraph 187 refers to the integration of new development with existing development. Policy EN16 seeks to restrict development that is sensitive to noise from areas with high levels of noise pollution, unless adequate mitigation measures are provided.
- 5.29 A noise assessment has been prepared and accompanies this application. Noise measurement surveys were carried out at the site and the likely noise internal noise impacts on the proposed development calculated. Based on these calculations, the report recommends double glazing and trickle vents. Subject to these recommendations, the report concludes that there should be no objection to granting planning permission on noise grounds.
- 5.30 **Trees and Landscaping:** The site does not currently benefit from landscaping and the site does not contain trees. The proposals therefore comprise an improvement as areas of the site will be

landscaped to provide amenity space and it is proposed that the details of landscaping can be secured by condition.

- 5.31 **Transport and Parking:** The NPPF requires transport statements or assessments to accompany applications where relevant so that the impact of the proposal can be assessed (paragraph 113). At paragraph 111 it states that development should only be refused on transport grounds where there would be an unacceptable impact on highway safety, or where the cumulative impacts on the road network would be severe. The NPPF also promotes sustainable modes of transport and promotes development that can be accessed by public transport, pedestrians and cyclist.
- 5.32 Policy TR1 of the Local Plan requires major development proposals to implement measures to promote and improve sustainable transport facilities, encouraging walking, cycling and the use of public transport. Policy TR3 seeks to ensure that development does not result in an adverse impact on the highway network or the safety of its users, and TR4 promotes cycling.
- 5.33 The application is accompanied by a Transport Statement, prepared by Motion Transport. This confirms that the site benefits from good pedestrian and cycle routes, which link the site to the public transport network. It is also close to shops, services and facilities. Furthermore, secure cycle parking facilities will be provided for one space per apartment, in line with the Council's standards. It is therefore located such that it would encourage sustainable modes of transport.
- 5.34 The Transport Statement indicates that the proposal would not lead to harm on the highway network and would likely result in a reduction in vehicle trips associated with the site in comparison with the existing use of the 33 bedroom hotel.

- 5.35 The proposals include 14 parking spaces on site. The Council's maximum standards would allow for 17 spaces on site, however the sustainable location of the site ensures that one space per dwelling is acceptable. The Transport Statement demonstrates that, due to the site's location close to services, facilities, bus routes and public car parks, the proposal would not increase parking stress on street. In addition, on-street parking is subject to waiting restrictions. Should it be deemed necessary, a condition could be secured to prevent residents applying for parking permits.
- 5.36 The proposal therefore maximises opportunities for sustainable transport while potentially reducing vehicle movements on the road network. As such, it meets the aspirations of national and local policy in this regard.
- 5.37 **Refuse Provision:** On site separate refuse and recycling storage is proposed for each building, within easy reach of both the apartments and the highway.
- 5.38 **Air Quality:** The site falls within an Air Quality Management Area. In accordance with paragraph 186 of the NPPF and local Policy EN15, an Air Quality Assessment has been prepared and accompanies the application. The report sets out the detailed modelling and assessment that was implemented at the site. The report concludes that there will be no exceedences of the nitrogen dioxide or particulate matter objectives at sensitive receptor son the site and therefore no mitigation is required. Furthermore, the development is anticipated to have only a negligible impact on traffic movements and as such will not increase pollutant concentration levels at existing sensitive receptors. The proposal is therefore acceptable in terms of air quality.

- 5.39 **Drainage and SuDS:** The site is within flood zone 1 and is smaller than 1 hectare. As such, no flood risk assessment is deemed necessary. The proposal will utilise SuDS and this can be secured by condition.
- 5.40 **Sustainability and Energy:** Paragraph 8 of the NPPF supports the transition of development to a low carbon future and Local Plan Policy CC2 promotes sustainable design and construction and CC3 refers to adaptation to climate change. The national Code for Sustainable Homes has now been abolished, however it is proposed that the development would conform to Part L of the Building Regulations which as of 2010 requires a 25% reduction in carbon emissions over the 2006 standards. This is equivalent to Code level 3 of the Code for Sustainable Homes. By way of contributing to the reduction in carbon, the proposal would also achieve current building construction standards with added sustainability measures through;
- A. The limitation of the amount of inherent material, structure and embodied energy through the employment of good building standards to create an excellent SAP rating;
 - B. Use of locally sourced, recycled materials and labour where practicable;
 - C. Maximizing the use of natural light through floor-ceiling windows;
 - D. Reduced internal water consumption of 110 litres per person per day through the incorporation of water efficient sanitary fittings, including low flow toilets and water efficient taps for wash basins;

- E. Refuse, recycling and composting facilities to be provided to work with the Council's existing waste and recycling collection service;
- F. Secure cycle provision to encourage sustainable modes of transport;
- G. 'A' rated electrical appliances and energy saving light fittings;
- H. 'A' rated double glazed windows with natural cross ventilation provision;
- I. Water butts fitted to the rainwater down pipes for watering the garden;
- J. Recycling of waste construction materials where practicable;
- K. Permeable driveway/parking spaces to avoid increase in surface water runoff.

5.41 The proposal is therefore considered to comply with sustainability objectives in this respect.

5.42 **Ecology:** The site is currently laid to hardstanding with very little scope for ecology. As such, the provision of landscaping to the boundaries and rear of the site will improve biodiversity on the site in line with Local Plan Policy EN12. As the proposal includes the demolition of existing buildings, a bat report has been prepared and accompanies the application. This concludes that the site has low suitability to support roosting bats due to gaps associated with roof/hanging tiles and gaps at the eaves on the exterior of the building.

5.43 The bat scope report also concluded that the building has low hibernation potential for bats.

- 5.44 As the site comprises hardstanding and buildings, the risk on other notable species is considered to be negligible as confirmed in the accompanying report.
- 5.45 **Affordable Housing:** Policy H3 of the Local Plan required 30% of the total dwellings to be in the form of affordable housing on site of 10 or more dwellings. The policy sets out that provision should be made on site in the first instance with a financial contribution being negotiated to make up the full requirement as appropriate.
- 5.46 The policy explains that *“in all cases where proposals fall short of the policy target as a result of viability considerations, an open-book approach will be taken and the onus will be on the developer/landowner to clearly demonstrate the circumstances justifying a lower affordable housing contribution”*.
- 5.47 Viability information will follow the submission of this application.
- 5.48 **Community Infrastructure Levy:** The Council’s CIL charging schedule took effect on 1st April 2015. For residential development, the CIL charge is £156.71 per sq.m. The relevant CIL information has been submitted with the application.

6. Conclusion

- 6.1 This statement has demonstrated that the proposed development is acceptable in principle and makes an efficient use of land.
- 6.2 Material planning considerations have been carefully considered and analysed, as evidenced in section 5 of this statement and the supporting plans and documents. It is considered the proposed development would contribute an appropriate windfall site to the Borough’s housing supply while significantly improving the character

of the area, without compromising the amenity of neighbouring residents.

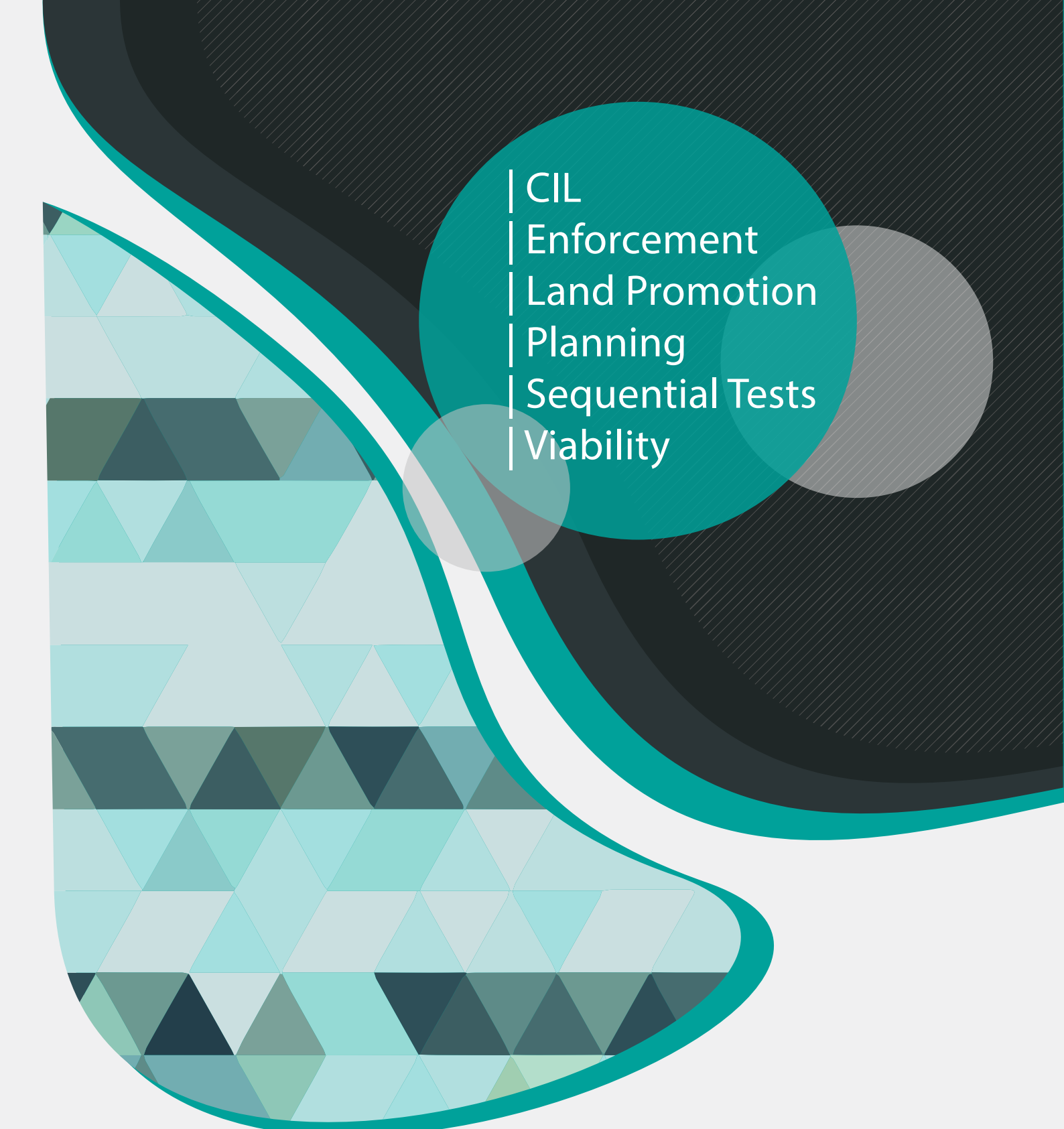
- 6.3 It is considered that the proposed scheme complies with relevant Development Plan Policies and is further supported by National Guidance. Therefore, it is respectfully requested that planning permission is granted.

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