

DELEGATED APPLICATION REPORT

Application No: 210774/FUL

Address: Hotel Ibis Reading Centre, Friar Street, Reading, RG1 1DP

Proposal: Recladding of the existing hotel to replace the Proteus 10 insulated metal rainscreen panel cladding and the insulated metal curtain wall panel with solid aluminium cladding.

Case Officer: Nathalie Weekes

Extended Target Date: 07/09/2021

1. Site Description and Surrounding Area

- i. The application site is located on the north side of Friar Street, to the west of the junction with Station road and Queen Victoria Street. The site forms part of a 14 storey C1 Ibis and Novotel hotel building with a bold, modern form and appearance which fronts a secondary shopping street within the town centre. The highest occupied floor is 38m above ground level on Friar Street. The surrounding area is characterised by a mixture of uses and building types.
- ii. The site is within an AQMA and major opportunity area, tall buildings cluster, primary shopping area, central and office core area, area of archaeological potential and allocated development site. There are listed buildings such as 13-15 Station Road and locally listed buildings such as 22 Friar Street located to the side of the hotel, in the vicinity of the building.
- iii. A certificate of ownership B has been completed and the owner informed of the proposed recladding.

2. The Proposal

- i. Planning permission is sought for the recladding of the existing hotel to replace the flammable Proteus 10 insulated metal rainscreen panel cladding and the insulated metal curtain wall panel with solid aluminium cladding the removal of external cladding and replacement with a new cladding system on all elevations from ground to fourteenth floor.

The applicant has confirmed the following context for the submission of the application:

An analysis of the materials on the building was carried out and compared against Approved Document B 2019 edition with 2020 amendments by WJE. It was found that all cladding materials are in compliance other than the insulated metal curtain wall panel and insulated metal rainscreen panel. Although approved Document B states that the cladding does not need to have a fire class rating of A2-s1, d0 or Class A1 because the hotel is not a relevant building, the flammability and the proximity of the insulated metal panels to the fire escape route and neighbouring buildings, renders the cladding unsafe in the event of a fire.

Whilst this is a process that requires urgency to address the immediate concerns of health and safety, the applicant is following the planning process as required by Reading Borough Council, prior to removing existing cladding and replacing it with an appropriate equivalent.

- ii. It is clarified that the removal of the cladding on the building separately in itself is considered to require planning permission, as this would fall within the definition of development (section 55 of the Town & Country Planning Act) as building operations (section 55 (1A) (d), also bearing in mind 55 (2) a(ii) and the change in appearance of the existing material beneath).

55 Meaning of “development” and “new development”.

1. *Subject to the following provisions of this section, in this Act, except where the context otherwise requires, “development,” means the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land.*

F1[(1A) For the purposes of this Act “ building operations ” includes—

- (a) demolition of buildings;*
(b) rebuilding;
(c) structural alterations of or additions to buildings; and
(d) other operations normally undertaken by a person carrying on business as a builder.]
2. *The following operations or uses of land shall not be taken for the purposes of this Act to involve development of the land—*
- (a) the carrying out for the maintenance, improvement or other alteration of any building of works which-*
(i) affect only the interior of the building, or
(ii) do not materially affect the external appearance of the building,

and are not works for making good war damage or works begun after 5th December 1968 for the alteration of a building by providing additional space in it underground.

- iii. More specifically, the proposal seeks to remove the Proteus 10 insulated metal rainscreen panel cladding and the insulated metal curtain wall panel (approved in 2003/2004 - see relevant history section below) and replace with a solid Aluminium cladding alternative with hidden fixing system to meet all necessary fire and safety requirements. The proposed colour of the cladding is to match the existing, with colour samples used to ascertain the best match. A metallic PPC finish has been chosen to mimic the metallic matt silver finish of the existing cladding panels that are to be replaced as much as possible. The objective of the application is subsequently to improve the fire safety of the residential building and reduce the risk of fire being transferred externally via the cladding material.

3. Consultation

i. Neighbour & Local Group Consultation

A site notice was put up (by the applicant owing to the on-going Coronavirus pandemic) on 11/06/2021, expiring on 02/07/2021. No neighbour letters of representation received.

ii. Internal Consultation

RBC Environmental Protection: No objection.

Removal of combustible material on the external walls is something that is encouraged.

Heritage Officer: No objection and did not recommend advertising of the proposal in this instance as it would not impact the views or setting of the listed buildings in front of the hotel.

Transport: No objection.

In principal there are no Transport objections to this application, however no details have been provided with regards to footpath or road closures that may be required to access and deliver materials or indeed where materials etc will be stored or requirements of crane use. If any footpath or road closures etc are required a license will need to be obtained.

Therefore, a CMS will be required; however, I am happy to deal with this by way of condition.

Suggested conditions

C2 CONSTRUCTION METHOD STATEMENT (TO BE SUBMITTED)

iii. External Consultation

Royal Berkshire Fire and Rescue Service: No objections.

Following the submission of additional information by the agent the RBFRS confirmed the following.

At this stage of planning application RBFRS have no objections, however we will make full comment under the Building Regulations Consultation process. At that stage it should be ensured that sufficient information is received to make an informed assessment of the suitability of the cladding materials and associated works.

Communication with agent

Additional information was provided, with agreement for a pre-commencement CMS condition.

4. Plans & Documents Considered

i. The Council, in reaching its recommendation, has taken into consideration the following plans & documents:

- 21_02_2289 Ibis Reading Planning Support Statement, LMA Architects, 5/03/2021, dated May 2021
- 21_02_2289L(00)001 - Location Plan
- 21_02_2289EX(01)002 - Level 0 - General Arrangement Plan as Existing
- 21_02_2289EX(01)004 - Level 2 - General Arrangement Plan as Existing

- 21_02_2289EX(01)005 - Level 3 - General Arrangement Plan as Existing
- 21_02_2289EX(01)006 - Level 4 - General Arrangement Plan as Existing
- 21_02_2289EX(01)007 - Level 5 - General Arrangement Plan as Existing
- 21_02_2289EX(01)008 - Level 6 - General Arrangement Plan as Existing
- 21_02_2289EX(01)009 - Level 7 - General Arrangement Plan as Existing
- 21_02_2289EX(01)010 - Level 8 - General Arrangement Plan as Existing
- 21_02_2289EX(01)011 - Level 9 - General Arrangement Plan as Existing
- 21_02_2289EX(01)012 - Level 10 - General Arrangement Plan as Existing
- 21_02_2289EX(01)013 - Level 11 - General Arrangement Plan as Existing
- 21_02_2289EX(01)014 - Level 12 - General Arrangement Plan as Existing
- 21_02_2289EX(01)015 - Level 13 - General Arrangement Plan as Existing
- 21_02_2289EX(01)016 - Level 14 - General Arrangement Plan as Existing
- 21_02_2289EX(02)002 - Existing Elevations D E and F
- 21_02_2289EX(02)003 - Existing Elevations G H and I
- 21_02_2289L(00)002 - Risk Register Site Plan
- 21_02_2289L(01)002 - Level 0 - General Arrangement Plan as Proposed
- 21_02_2289L(01)004 - Level 2 - General Arrangement Plan as Proposed
- 21_02_2289L(01)005 - Level 3 - General Arrangement Plan as Proposed
- 21_02_2289L(01)006 - Level 4 - General Arrangement Plan as Proposed
- 21_02_2289L(01)007 - Level 5 - General Arrangement Plan as Proposed
- 21_02_2289L(01)008 - Level 6 - General Arrangement Plan as Proposed
- 21_02_2289L(01)009 - Level 7 - General Arrangement Plan as Proposed
- 21_02_2289L(01)010 - Level 8 - General Arrangement Plan as Proposed
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- 21_02_2289L(01)014 - Level 12 - General Arrangement Plan as Proposed
- 21_02_2289L(01)015 - Level 13 - General Arrangement Plan as Proposed
- 21_02_2289L(01)016 - Level 14 - General Arrangement Plan as Proposed
- 21_02_2289L(02)001 - Proposed Elevations A B and C
- 21_02_2289L(02)002 - Proposed Elevations D E and F
- 21_02_2289L(02)003 - Proposed Elevations G H and I
- 2289L(00)003 - Block Plan
- CIL Form

As received 17 May 2021

- 21_02_2289- L(03)001 Existing sections
- GA01_00 BF3 DT01 - DT12 Rainscreen façade system description, Britfab Limited
- 21_02_2289 D(21)001 Cladding Detail - Replacement of Proteus 10 Rainscreen Cladding
- 21_02_2289 D(21)002 Cladding Detail - Replacement panels between curtain wall
- Email from agent dated 01/06/2021 14:30 confirming the proposed materials will match the existing in appearance with no visible fixings.

As received 1 June 2021

- 21_02_2289EX(02)001 - Existing Elevations A B and C
- 21_02_2289 L(68)003 - Cavity closers - el. G H and I
- Drawing issue register
- 21_02_2289 SPEC(08)001 General specification

As received 24 August 2021

5. Relevant Planning History

03/01294/FUL - Demolition of Shoemiths Court in Merchants Place and erection of 2 hotels, with 112 flats and 25 carparking spaces. Permitted subject to a legal agreement 31/03/2004.
02/00841/FUL - Demolition of former ABC cinema and Boars Head public house, and Shoemiths Court in Merchants Place, redevelopment to form 2 hotels, with 112 flats and 25 carparking spaces. Permitted subject to a legal agreement 31/03/2003.

Condition 2 of permissions 03/01294 and 02/00841 required “Prior to the commencement of construction.. samples of all materials.. shall be submitted to and approved by the Local Planning Authority before any development is commenced.” It is this cladding that this application seeks to remove and replace.

6. Equality Act 2010:

In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. However, there is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application. Therefore in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

7. Relevant Planning Guidance

Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving a listed building or its setting or any features of special interest which it possesses.

Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority in the exercise of its functions to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'. However the NPPF does not change the statutory status of the development plan as the starting point for decision making (NPPF paragraph 12).

In this regard, the NPPF states that due weight should be given to the adopted policies of the Local Plan 2019 according to their degree of consistency with the NPPF (the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given).

Accordingly, the National Planning Policy Framework 2019 and the following development plan policies and supplementary planning guidance are relevant:

Reading Borough Local Plan 2019

- CC1 Presumption in Favour of Sustainable Development
- CC2 Sustainable Design and Construction
- CC3 Adaption to Climate Change
- CC7 Design and the Public Realm
- CC8 Safeguarding Amenity
- EN1 Protection and Enhancement of the Historic Environment
- EN3 Enhancement of Conservation Areas
- EN6 New Development in a Historic Context
- TR3 Access, Traffic and Highway-Related Matters
- TR5 Car and Cycle Parking and Electric Vehicle Parking

Supplementary Planning Documents & other relevant documents/guidance

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Historic England, 2015b).

8. Appraisal

- i. The main issues are considered to be:
 - Design / Effect on Heritage Assets
 - Amenity
 - Transport
 - Other matters

- ii. Design / Effect on Heritage Assets

Policy CC7 of the Local Plan requires that all development be of a high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. Policy EN1 requires all proposals to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Policy EN3 notes that positive consideration will be given to proposals which take opportunities to enhance the character of conservation areas. The Council will, therefore, have regard to both the quality of the townscape and the quality and interest of the area, rather than solely that of the individual building.

Paragraph 127 of the NPPF 2019 details that decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character including the surrounding built environment

Paragraph 193 of the NPPF 2019 details that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

The proposals would involve replacing the existing the Proteus 10 insulated metal rainscreen

panel cladding and the insulated metal curtain wall panel and replace with a solid Aluminium cladding which would achieve the new national guidelines for fire safety being classified as A1 non-combustible. The replacement material would closely match the existing cladding and, externally, the building would appear broadly similar in appearance.

Due to the similar nature of the materials, in both appearance and size, it is considered that the proposed development would not materially affect the design and appearance of the building nor would there be any adverse effects on nearby historic assets. The Council's Heritage Officer has raised no objection to the proposals.

Given the existing and important context, the proposals are welcomed by the Council. In accordance with Policies CC7, EN1 and EN3 of the Reading Borough Local Plan 2019.

iii. Amenity

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.

Given the nature of the proposals, they are not considered to result in any significantly harmful impacts on neighbouring amenity, in respect of any Policy CC8 considerations. One condition, relating to hours of works, is considered to be necessary. It is considered that the works would improve the standard of accommodation by reducing fire risk at the site.

Therefore, in overall terms it is considered that the proposals comply with Policy CC8.

iii. Transport

There are no transport objections however a pre-commencement construction method statement is required to provide further information with regards to any potential footpath or road closures, or crane use during construction. If any footpath or road closures etc are required a license will need to be obtained.

iv. Other matters

Although fire safety is not a material planning consideration, the reasons behind the removal and replacement of the existing cladding are fully understood and acknowledged by officers.

CIL - The proposal seeks amendments to the external faced only and as such is not liable for the Community Infrastructure Levy.

9. Conclusion

- i. In this instance the rationale behind the removal of the existing material has been clearly explained and the proposed material is considered acceptable in relation to the building, area and nearby heritage assets. In addition, it has been shown that the proposals are acceptable in all other regards, such as amenity and transport, subject to conditions. Accordingly, having regard to the material considerations and all matters raised, the Local Planning Authority

considers that the balance of considerations therefore weigh in favour of granting planning permission subject to conditions.

RECOMMENDATION:

GRANT subject to conditions and informatives