

Sequential Site Assessment for
RBH Hospitality Management

PROPOSED HOTEL ON THE CROWNE PLAZA CAR PARK SITE, RICHFIELD AVENUE, READING RG1 8BD

July 2019

Our Ref: AKH/JR/17-04763



Contents

1	Introduction	2
2	Application Site and Surroundings	3
3	Pre-Application Consultation	4
4	Proposed Development	6
5	Planning Policy Context	7
6	The Sequential Approach.....	10
7	Summary and Conclusions.....	18

Appendices

Appendix 1	Site Location Plan
Appendix 2	Sequential Site Location Plans

QUALITY ASSURANCE

This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2008.

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1 INTRODUCTION

- 1.1 This Sequential Assessment has been prepared by Rapleys LLP on behalf of RBH Hospitality Management in support of a full planning application for the proposed development of a 132-bed hotel on the site of the existing Crowne Plaza Hotel car park, Richfield Avenue, Reading RG1 8BD. A site location plan is attached at **Appendix 1**.
- 1.2 This assessment addresses the national and local planning policy tests applicable to main town centre uses that affects the development proposal, which is located in an out of centre location in planning terms.
- 1.3 The assessment methodology is provided within the following sections of this statement, along with detailed consideration of potential alternative sequentially preferable sites which are potentially suitable, viable and available to accommodate the proposed development.
- 1.4 This statement has been updated since it was prepared (June 2018) for the previous application for the proposed hotel development at the site (Ref: 181056) to take account of any changes to policy, site circumstances and to consider any additional sites.
- 1.5 This statement should be read in conjunction with the documentation submitted in support of the planning application.

2 APPLICATION SITE AND SURROUNDINGS

THE SITE

- 2.1 The application site currently supports car parking associated with the existing Crowne Plaza Hotel, Richfield Avenue, which is located to the east of the hotel. The site benefits from an attractive setting, being in close proximity to the Thames riverside to the north. Vehicular access is from the Thames Side Promenade, via Richfield Avenue, to the south. To the south west of the site is the Premier Inn and Toby Carvery.

SURROUNDINGS

- 2.2 The site generally sits within an area of mixed commercial uses, with a café, BP garage and auto trade and other commercial premises located to the south of Richfield Avenue. Additionally, a four storey residential block is located immediately opposite the Thames Side Promenade. Offices, a restaurant and residential uses are located at the Caversham Road/Richfield Avenue roundabout junction to the east. To the west of the site is the Rivermead Leisure Centre, its associated car park and a large area of open space.

PLANNING HISTORY

- 2.3 A review of the Council's online planning history records has been undertaken and has revealed a number of minor applications related to the display of advertisements, pollarding of plane trees and the erection of a T-shaped pontoon at the river side of the Crowne Plaza Hotel and use of the land for permanent mooring of the vessel "Windrush" (LPA Ref. 09/00054/FUL, decided 6 May 2009). Although the construction of the Crowne Plaza Hotel pre-dates the Council's online records system, it is understood that the site has an extensive planning history of extensions to the main building and associated leisure club.
- 2.4 In summary, it is clear from the planning history that the site has been in use for hotel car parking for a number of years, with significant investment to improve the hotel's visitor provision during this time.

3 PRE-APPLICATION CONSULTATION

3.1 The National Planning Policy Framework (NPPF) 2019 identifies that early engagement has the potential to significantly improve the efficiency and effectiveness of the planning system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and results in improved outcomes for the community.

3.2 Therefore, in accordance with the Government's localism agenda, pre-application consultation has been undertaken with Reading Borough Council to refine the development proposal and agree the scope of the planning application submission, including the sequential test.

PRE-APPLICATION CONSULTATION WITH READING BOROUGH COUNCIL

3.3 Prior to submitting the previous planning application (Ref: 181056), in June 2018, the applicant undertook pre-application consultation with the local planning authority. This comprised a pre-application request sent on 22 December 2017, which was followed by a formal pre-application meeting with the Case Officer, Susanna Bedford, on 14 March 2018.

3.4 At the meeting, the Case Officer confirmed that the Council is not aware of any potentially sequentially preferable sites which would require consideration as part of the assessment. Accordingly, the applicant has carried out a scoping exercise in order to provide a robust assessment to accompany the planning application.

3.5 The applicant sought to agree the scope of the sequential assessment by email dated 29 March 2018. This proposed the following scope of the sequential assessment:

- **Area of search.** The applicant has identified market demand for a hotel in the north of Reading's central area. Accordingly, the catchment area is location-specific to Reading's central area and the site must be in a short distance of the central core to enable hotel visitors to utilise the town centre for leisure and work purposes. Therefore, the search for alternative sites will concentrate on sequentially preferable sites within and on the edge of Reading town centre.
- **Flexibility.** The proposed scheme comprises a five-storey hotel with 132 hotel rooms and 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 this 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 dedicated 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 in the central area and the need to discourage on site parking. On this basis, the minimum site area used for the purposes of the assessment having regard to flexibility is calculated to be 0.2 ha (0.5 acres) in parking zone 1 and 0.3 ha (0.7 acres) in parking zone 2.

3.6 In summary, the following parameters were agreed with the Council:

- A location within, or on the edge of, Reading central area;
- A minimum site area of 0.2 ha in parking zone 1 and 0.3 ha in parking zone 2;
- Prominent roadside location; and
- A topographically flat site.

3.7 A proposed scope was initially agreed by the Case Officer by email dated 4 April 2018.

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- 3.8 Notwithstanding this, following the withdrawal of the previous application (Ref. 181056), a subsequent pre-application meeting took place on the 6th February 2019 at 12:00 am at the Reading Borough Council offices, relative to the issues identified during the course of the original submission.
- 3.9 As part of the pre-application meeting Case Officers provided comment on two further sites that should be considered as part of a further sequential assessment to support a secondary submission. These were 20 Hosier Street (Ref. 182054) and No. 1 Reading, 29 Station Road (Ref. 181930).
- 3.10 In the first instance 20 Hosier Street (Ref. 182054) can be discounted for the purpose of the assessment as the site area measures 0.1 ha and in accordance with the assessment parameters agreed with the Council, this falls below the minimum site area of 0.2 ha in parking zone 1.
- 3.11 No. 1 Reading, 29 Station Road (Ref. 181930) has been reviewed as part of this sequential assessment, as it met the parameters agreed with the Council. Notwithstanding, for the reasons outlined in the sequential assessment below the site has been dismissed as being sequentially preferable for the proposed development.

4 PROPOSED DEVELOPMENT

- 4.1 The planning application seeks permission for the erection of a 132-bed hotel comprising ground and four upper storeys with a flat roof. The hotel will comprise a slender rectangular building faced predominantly in brick with vertical fenestration, presenting a modern, clean appearance.
- 4.2 The proposal will share parking with the adjacent Crowne Plaza Hotel, with access provided from the existing access on Richfield Avenue.
- 4.3 Full details of the proposed development are presented in the plans accompanying the submission.

5 PLANNING POLICY CONTEXT

- 5.1 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

- 5.2 The national tier of planning policy is set out within the National Planning Policy Framework (2019) ('NPPF') which is supplemented by the National Planning Practice Guidance (2014) ('NPPG').

The Presumption in Favour of Sustainable Development

- 5.3 At the heart of the NPPF is a presumption in favour of sustainable development, which is at the heart of the Framework running through both plan-making and decision-taking. 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:
 - 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;
 - Specific policies in the Framework indicate development should be restricted.

Ensuring the Vitality of Town Centres

- 5.4 Paragraph 85 advises that planning policies should support the role that town centres play, by taking a positive approach to their growth, management and adaptation.
- 5.5 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 respond to rapid changes in the retail and leisure industries.
- 5.6 At paragraph 86, 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).
- 5.7 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.
- 5.8 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.

The National Planning Practice Guidance

- 5.9 The National Planning Practice Guidance ('NPPG') provides specific guidance on ensuring the vitality of town centres. Paragraph 008 Reference ID: 2b-008-20140306 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.

- 5.10 Paragraph 010 Ref ID: 2b-010-20140306 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.
- 5.11 Paragraph 011 Reference ID: 2b-011-20140306 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 mean that they may only be accommodated in specific locations.

LOCAL PLANNING POLICY - ADOPTED

- 5.12 The Development Plan for Reading Borough Council comprises the following documents:
- Core Strategy - adopted 2008 with Alteration (adopted 27 January 2015);
 - Sites and Detailed Policies Document with Alteration(adopted January 2015); and
 - Reading Central Area Action Plan (adopted 2009).
- 5.13 The accompanying Proposals Map identifies that the site is located within a Major Landscape Feature area, where Core Strategy Policy CS37 and Sites and Detailed Policies Document Policy SA17 are applicable.
- 5.14 In terms of policies relevant to the sequential assessment, the site is located adjacent to the Central Area boundary and 550 metres from the Central Core (the town centre boundary) measured along Caversham Road. Therefore, although the site is located close to Reading's Central Area, as it located over 300 metres from the effective town centre boundary it occupies an out of centre location in planning policy terms. Therefore, Policies RC6 and RC7 of the Central Area Action Plan are applicable.
- 5.15 The policies relevant to the sequential assessment are set out in detail below.

Core Strategy

- 5.16 **Policy CS25 (Scale and Location of Retail, Leisure and Culture)** requires major retail and main town centre leisure and culture development to take place in, or as an extension to, the centre of Reading. Where a need for additional development has been identified, and no sites are available in or adjoining the centre of Reading, a sequential approach should be adopted to identifying alternative sites. All development will comply with the relevant tests for retail, leisure and culture development as set out in government guidance.

Central Area Action Plan

- 5.17 **Policy RC6 (Definition of the Centre)** states that development of main town centre uses other than retail and office development will take place in the Central Core, as defined on the Proposals Map.
- 5.18 **Policy RC7 (Leisure, Culture and Tourism in the Centre)** advises that the Reading Central Area will be the prime focus for major leisure, cultural and non-regionally significant tourism development. These uses should be concentrated within the Central Core, as defined on the Proposals Map. There should be no net loss of the Centre's overall leisure provision. The River Thames is a prime location for new or improved non-regionally significant tourist attractions, and as such, this area is likely to be suitable for informal recreation and sporting uses and associated small-scale development. Development or

improvements in this area will be expected to add to or maintain the setting and character of the Thames.

- 5.19 There are no other policies specifically relevant to hotel development in the town centre.

LOCAL PLANNING POLICY - EMERGING

- 5.20 Reading Borough Council is working on a new Local Plan, which will replace the current adopted plans (Core Strategy, Central Area Action Plan and Sites and Detailed Policies Document). The plan sets out the Council's aspirations for development in Reading to the year 2036.
- 5.21 The Pre-Submission Draft Local Plan and was submitted to the Secretary of State in March 2018, with public examination commencing in 2018 and hearings taking place between the 25th September and 5th October 2018. As a result of these hearings, and subsequent information being provided, the Inspector identified a need for 'main' modifications. The consultation for these took place between Wednesday 12 June 2019 and Wednesday 24 July 2019. The emerging Local Plan represents a material consideration, albeit weight attached to the draft policies will be necessarily limited.
- 5.22 **Policy RL2 (Scale and Location of Retail, Leisure and Culture Development)** is relevant to the sequential assessment. This states that provision will be made for up to 34,900 sq. metres of retail and related facilities in Reading to 2036, together with new leisure facilities.
- 5.23 Retail and main town centre leisure and culture development, where it would mean a net gain of over 2,500 sq. metres, will take place in, or as an extension to, the centre of Reading, unless it is on a site allocated for such development. Where a need for additional development has been identified, and no sites are available in or adjoining the centre of Reading, a sequential approach should be adopted to identifying alternative sites.
- 5.24 All development will comply with the relevant tests for retail, leisure and culture development set out in national policy.

6 THE SEQUENTIAL APPROACH

- 6.1 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.
- 6.2 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.
- 6.3 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).
- 6.4 On this basis, as the site falls 550 metres from the Central Core boundary measured along Caversham Road (A4155) the site occupies an out-of-centre location with respect to Reading town centre.

METHODOLOGY

- 6.5 NPPG ‘Ensuring the vitality of town centres’ provides guidance on the application and interpretation of the sequential test. This includes the importance for scoping the remit of the sequential assessment, for agreement between the applicant and local planning authority (ref: ID 2b-015-20140306).
- 6.6 This assessment has had full regard to this guidance and is based on a scope as agreed with the Case Officer, Susanna Bedford, on 4 April 2018.
- 6.7 NPPG further identifies the considerations (ref: ID 2b-010-20140306) 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.
- 6.8 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 (ref: ID 2b-011-20140306).
- 6.9 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).
- 6.10 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 Reading. Typically, any centre located within the catchment area of the proposal should be assessed for sequentially preferable sites and on this basis, the sequential site assessment has given regard to any alternative sites within, or on the edge of, Reading town centre only. This approach has been agreed by Reading Borough Council at pre-application stage.

- 6.11 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.
- 6.12 The scheme proposed, comprises a five storey hotel with 132 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.
- 6.13 On this basis, having regard to flexibility, the minimum site area used for the purposes of the assessment is 0.2 ha in parking zone 1 and 0.3 ha in parking zone 2.
- 6.14 However, it is important to note that this site size threshold has been adopted to ensure a robust assessment. In practice, the site required for the hotel footprint extends to 0.28 acres (0.11 ha) only, with the site area including access and parking extending to 1.4 acres (0.57 ha). The smaller size of the proposed application site is due to efficiencies created by the proposed shared use of the car park between the existing Crowne Plaza Hotel and the proposed hotel.
- 6.15 The construction methods employed by the applicant are also relevant to the sequential assessment. RBH Hospitality Management utilise a modular construction method whereby hotel rooms are built and furnished off-site and assembled on-site. This construction method is integral to the viability of the business model and informs the number of rooms that the market can support in a particular location. For this reason, it is not possible for the applicant to convert an existing building or demolish buildings in order to implement the development. Therefore, vacant land (or land consisting of a low intensity use such as car parking) is required for the proposed development to be viable.
- 6.16 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.
- 6.17 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.
- 6.18 Reading Borough Council is not aware of any potential sequentially preferable sites which would require consideration as part of the assessment. Therefore, the applicant has carried out a scoping exercise to identify alternative, sequentially preferable sites, which was agreed with the Local Planning Authority prior to the assessment being carried out.
- 6.19 In assessing and identifying any other potential sequentially preferable sites, a review of Reading Borough Council's Development Plan Documents was undertaken, along with a review of online property database Co-Star Focus. These sites are detailed below, with location plans attached at **Appendix 2**.
- Abattoirs Road (0.43 acres);
 - Hills Meadow Car Park, George Street (3.5 acres);
 - Adopted Site Allocation RC3b - Reading Prison;
 - Emerging Site Allocation CR11e - North of Station;
 - Emerging Site Allocation C12e - Hosier Street; and,
 - No. 1 Reading, 29 Station Road (0.22 acres).

SEQUENTIAL ASSESSMENT

6.20 Each of the identified sites has been assessed in turn below, using the following criteria, to ascertain whether they form sequentially preferable alternatives to the application site in terms of:

- **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 these sites.

Abattoirs Road

6.21 The site extends to 0.5 acres (0.195 ha) in size and is located at the end of Abbatoirs Road (to the west of Caversham Road), directly to the south of the railway line. The site is located in parking zone 2, with the site entrance located opposite the Central Core boundary to the west of Caversham Road. Therefore, the site occupies an edge of centre location in sequential terms.

6.22 The site comprises previously developed land and is topographically level. It is bound to the north by a detached dwelling with Abbatoirs Road and the railway line beyond. To the south, the site is bound by two 4-6 storey apartment buildings (which are separated by a private outdoor space). The site is bound to the west by car parking and to the east by Caversham Road.

6.23 The site has previously been advertised for let however it is not presently actively marketed and is therefore not considered to be available for the purposes of the sequential test.

6.24 The site is an irregular shape, with a narrow frontage (approximately 11 metres) along Caversham Road, such that a hotel in this location would not benefit from good visibility from the main road, having regard to flexibility. Nor would the irregular shape be capable of accommodating the proposed development having regard to flexibility. Therefore, in addition to not being available, the site is not suitable for the proposed development and is dismissed as being a sequentially preferable location.

Hills Meadow Car Park, George Street

6.25 The site extends to 3.5 acres (1.4 ha) in size and is located 220 metres from the Central Core boundary measured along George Street, therefore occupying an edge of centre location for the purposes of the sequential assessment. The site is located in parking zone 2. The site is bound to the north and east by Hill's Meadow, which features a BMX track, to the east by a narrow stretch of Hill's Meadow with the River Thames beyond, to the south by the River Thames, and to the west by George Street, with Christchurch Meadow's opposite.

6.26 The site is isolated within a large area of undeveloped open space comprising Christchurch Meadow, Hill's Meadow, and the River Thames and George Street. The site is allocated as a Major Landscape Feature under Policies CS37, SA17 of the adopted local plan. Christchurch Meadow and Hill's Meadow (excluding the area of Hills Meadow Car Park) are allocated as important areas of open space under Policy RC14a and RC14b of the adopted Central Area Action Plan. Sites designated as public open space under Policy RC14 are protected from development. The policy further states that proposals that would jeopardise the use or enjoyment by the public of these areas will not be permitted. Further, proposals adjacent to these areas will ensure that access to the spaces is maintained and, where appropriate, enhanced.

- 6.27 An application for the development of a hand car wash and valeting operation on unused land adjacent to Hills Meadow Car Park with associated public toilet facilities, refreshment servery and waiting area was approved on 30 March 2015 subject to a Section 106 contribution towards traffic counters and live car park capacity information to improve the operation of the car park (Ref. 141841). The car wash site comprises a small area of land located on the northern boundary of the car park. The Case Officer's report for the application includes a reference to the Major Landscape Feature designation, the purpose of which "is to maintain the general openness of the area". An application for a similar development was previously refused in part because "the proposal would appear as a cramped industrial and urbanising presence in the landscape" and as such would be contrary to a number of policies in the local plan including CS7, SA17 and RC14.
- 6.28 The site is currently owned by NCP and operated as the Reading Hills Meadow Car Park, with capacity for 298 cars and five disabled spaces. Parking charges apply daily between 6am and 6pm.
- 6.29 The site is not actively marketed for sale and is therefore not available for the purpose of the sequential assessment.
- 6.30 Notwithstanding the availability of the site, the car park is not considered to be suitable for the proposed development in the context of the surrounding area, which differs significantly from the application site in being predominantly open in character. A hotel use on the car park site would certainly jeopardise the use or enjoyment by the public of these areas and therefore be contrary to Policy RC14 of the adopted Central Area Action Plan.
- 6.31 In addition, the development of a hotel on this site would have an adverse impact on the capacity and effective operation of the existing car park, which is understood to be well-used by commuters due to its location within walking distance of Reading Railway Station. The car park is also ideally located for leisure visitors to the Christchurch Meadow Tennis Courts, River Thames and View Island.
- 6.32 For these reasons, the site is dismissed as being sequentially preferable for the proposed development.

Adopted Site Allocation RC3b, Reading Prison

- 6.33 The site is located within the north eastern 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 south east. The main building is Grade II listed due to its architectural interest and for the pioneering use of the "radial plan", which introduced a separate system of constant surveillance and solitary confinement, as described in the list entry. In addition, the prison is noted for the imprisonment of Oscar Wilde. The prison was put to various institutional uses before closing in 2013.
- 6.34 The site is bound to the north and east by Forbury Road, to the south by Chestnut Walk (with the River Kennet beyond), and to the west by Reading Abbey Ruins and St James RC Church.
- 6.35 The site is allocated under Policy RC3b for residential, commercial offices or a hotel. Development should enhance the setting of the Abbey ruins.
- 6.36 The prison site is understood to be owned by the Ministry of Justice and is not currently marketed as being available for development, although the principle of the site's re-use is supported by the adopted and emerging planning policy position. Plans for the prison's conversion to residential use were announced in late 2016, with a planning brief to be prepared for approval by Reading Borough Council during the latter half of 2017, prior to the site being marketed for sale. The proposal for the site's conversion to residential use

will have full regard to the site's historic fabric. A local arts group has also shown interest in the site for an arts centre.

- 6.37 Notwithstanding the present availability of the site, it would not be suitable for the broad type of development proposed by the applicant owing to the need to convert the existing prison buildings to hotel use, which is at odds with the modular design proposed.
- 6.38 Furthermore, the site would not be viable for the proposed development. The prison building is understood to have capacity for approximately 300 homes, which demonstrates that it is too large to accommodate a development of 132 hotel rooms. A part-development of a hotel would also prejudice the comprehensive conversion of the site for residential use.
- 6.39 Although the principle of demolition and redevelopment is clearly not supported due to the site's heritage listing, the need to demolish and clear the existing building would render the site unviable for the development proposed, particularly in that it would represent a significant deviation from both the proposed design and construction method, which is in turn linked to the scheme's viability.
- 6.40 For these reasons, the site is dismissed as being sequentially preferable for the proposed development.

Emerging Site Allocation CR11e - North of Station

- 6.41 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. The site is located within parking zone 2.
- 6.42 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. It is understood that the former sorting office site is currently in use by Network Rail whilst works are carried out to Reading Station, following which the site will become available for development.
- 6.43 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. The site is identified as sub-area E. A key diagram gives additional details of the Council's vision for development of the sub-area, which aspires to create diagonal linkages across the existing site from the north and north west to Reading Station. Public space is proposed directly to the north of the station, along with a transport interchange to the west of the multi-storey car park.
- 6.44 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".
- 6.45 The site allocation description for sub-area E states,
- "There will be retail and leisure development on the ground floor activating the streets and spaces including the new northern station square, with other uses including residential and offices on upper floors. Retail will have good pedestrian links to, and will not have a detrimental impact on, the rest of the retail core of the centre. Public car parking will be provided. A high quality route incorporating a green link should be provided through to the Thames. Development should take account of mitigation required as a result of a Flood*

Risk Assessment, and should consider opportunities to open up the culverted Vastern Ditch and enhance it as an ecological feature.

Site size: 6.71 ha. Indicative potential: 640-960 dwellings, 50,000-80,000 sq. metres net gain offices, 3,000-6,000 sq. metres net gain of retail and leisure, hotel.”

- 6.46 It is clear from the emerging Local Plan that realisation of the Council’s vision would require the demolition and redevelopment of the existing retail park (which contains several operating businesses including Aldi, Clarks and The Range) and multi-storey car park. These existing uses are not presently marketed for sale and their sites are therefore not available for the purposes of the sequential assessment. As stated above, the former sorting office site is expected to become available following the completion of works to Reading Station.
- 6.47 A proposal has recently come forward for the former sorting office site for a scheme entitled Reading Metropolitan, which would comprise a mixed use development including residential, office and commercial floorspace, along with public open space, underground parking and landscaping. An EIA Scoping Opinion request was submitted to Reading Borough Council in January 2018 on behalf of Hermes Investment Management, with the Council’s formal opinion provided on 29 March 2018 (Ref. 180146/SCO).
- 6.48 A section of the former sorting office site was granted outline consent in 2012 for mixed use development including hotel use (Ref. 11/00276/OUT); however, this consent has since lapsed. The documents submitted with the recent EIA scoping request confirm that hotel use is no longer proposed on this site following revised viability assessments that informed the redevelopment scheme.
- 6.49 Notwithstanding that the site is not presently available for redevelopment owing to the existing permanent and temporary uses on site, the allocated area would not be suitable for the broad type of development proposed as it would prejudice the comprehensive redevelopment of the site, including phased redevelopment. The proposed mixed-use development with active ground floors and offices/residential on upper floors would also require a significant deviation from the broad type of development proposed by the application: a modular hotel building housing a single use.
- 6.50 The need to undertake costly land assembly and significant demolition would further render the proposed development unviable on this site.
- 6.51 For these reasons, the allocation site (including individual parcels within the allocated area) is dismissed as being sequentially preferable for the proposed development.

Emerging Site Allocation CR12e - Hosier Street

- 6.52 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.
- 6.53 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.
- 6.54 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.

- 6.55 Hosier Street Market operates along the southern side of Hosier Street on Wednesday, Thursday, Friday and Saturday.
- 6.56 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". A key diagram gives additional details of the Council's vision for development of the sub-area, which 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'.
- 6.57 The site allocation description for sub-area E 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.*
- Site size: 3.41 ha. Indicative potential: 500-750 dwellings, 4,000-6,000 sq. metres retail and leisure."*
- 6.58 Although the allocated site area extends to 3.41 ha in size, the developable area is considerably smaller given the existing uses on the site, 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 for development within six months.
- 6.59 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 the broad type of development proposed. Primarily, this is 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.
- 6.60 In addition, development of a standalone hotel in this location would be likely to prejudice the comprehensive redevelopment of the site. The aspiration for sub-area E describes activating the edges of the open space with a mix of uses, potentially including hotel use. The proposed mixed-use development with active ground floors and offices/residential on upper floors would also require a significant deviation from the broad type of development proposed by the application, which is a modular hotel building containing a single use.

-
- 6.61 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.
- 6.62 For these reasons, the allocation site (including individual parcels within the allocated area) is dismissed as being sequentially preferable for the proposed development.

No. 1 Reading, 29 Station Road

- 6.63 The site extends to 0.22 acres (0.09 hectares) in size and is located at 29 Station Road, located directly south of Reading Railway Station. The site is located within parking zone 1, with the site entrance located off Station Road. The site occupies an in-centre location in sequential terms.
- 6.64 The site comprises previously developed land and is topographically level. It is bound by Garrard Street to the north, with beyond this Thames Tower (approximately 10 storeys), Station Road to the east, an RBS (Royal Bank of Scotland) to the south (4-6 storeys) and Garrard House to the west (4-6 storeys).
- 6.65 Currently the site is occupied by the vacant Norwich Union building, which was the scene of a fire back in April 2018. Subsequent to this, an application has been validated on the 6th December 2018 for the demolition of the existing vacant 6-storey retail and office building and erection of a replacement basement and part 4, part 22 (with rooftop plant above) storey building to provide flexible retail (Class A1, A2, A3, A4 or A5) use at part ground floor level, a 135-bedroom hotel (Class C1) at 1st to 16th floors and offices (Class B1a) at 17th to 21st floors, associated servicing from Garrard Street and other associated works (Application Ref. 181930).
- 6.66 The site is not currently actively marketed for sale and is therefore not available for the purpose of the sequential assessment.
- 6.67 Further, it has been confirmed by the applicant (Station Road Dev Co Ltd), which is controlled by global hotel investors Frank Truman in partnership with Breithorn Developments and Legacy Hotels & Resorts, that their intention is to retain and manage the building themselves, once built. Further, we have had confirmation that IHG Holiday Inn Express will be the hotel occupier and owner with Legacy Hotels acting as the operator.
- 6.68 Evidently, therefore, the hotel element is being developed in conjunction with hotel owner and operator Legacy Hotels and is not available to RBH Hospitality Management. Further, the proposed mixed-use development with active ground floors and offices on upper floors would also require a significant deviation from the broad type of development proposed by the application, which is a modular hotel building containing a single use.
- 6.69 For these reasons, the site is dismissed as being sequentially preferable for the proposed development.

SUMMARY

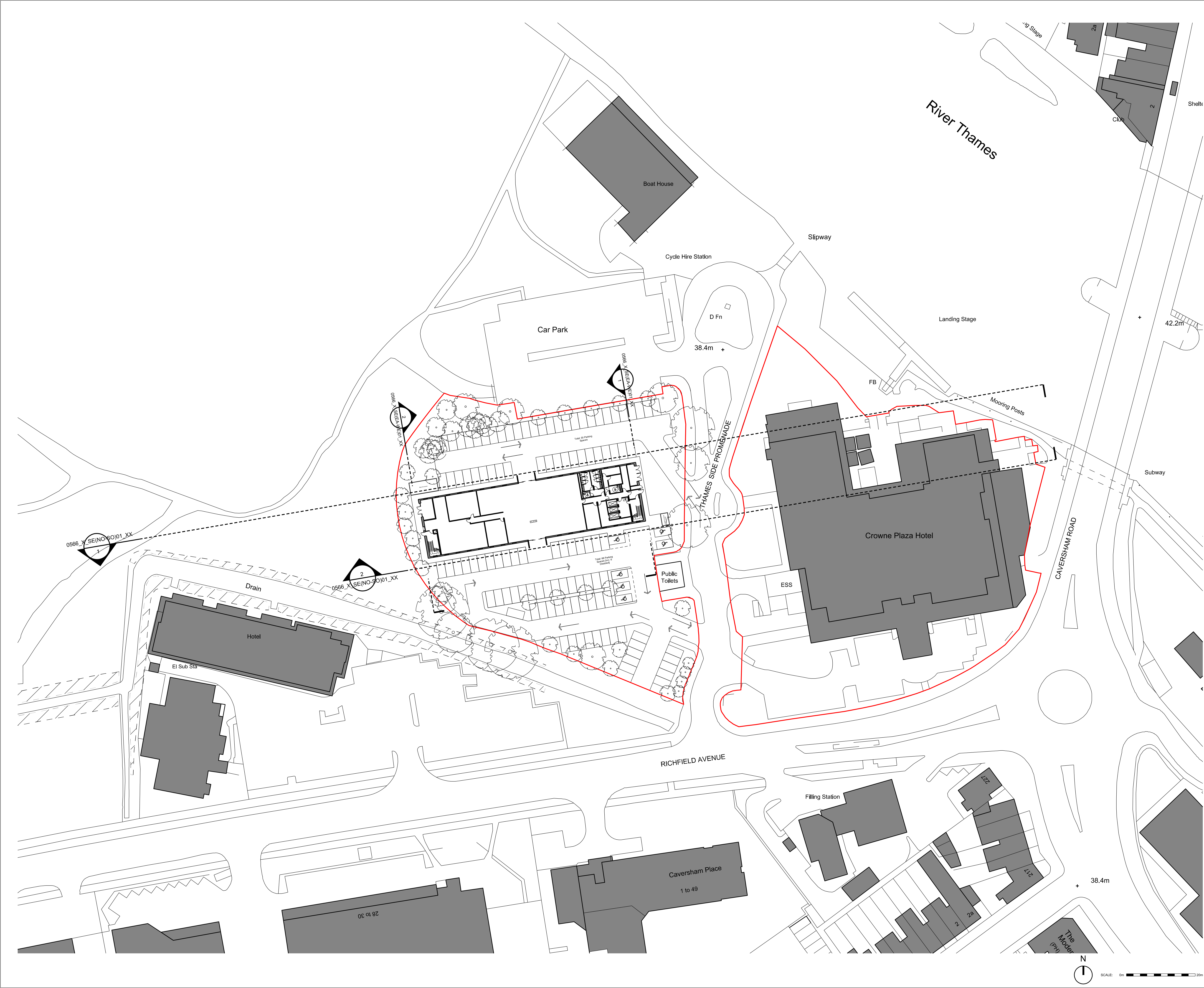
- 6.70 The assessments undertaken in respect of each site concluded that none of the sites assessed can be considered sequentially preferable when compared to the application site, either due to their availability, size, configuration and/or location and inability to viably deliver the operational requirements for the proposed development, having regard to flexibility, within or on the edge of Reading town centre.

7 SUMMARY AND CONCLUSIONS

- 7.1 This statement has assessed the proposed development against relevant national and local planning policy considerations for town centre uses.
- 7.2 It has been demonstrated that the proposal is acceptable in terms of the sequential approach to site selection as there are no alternative available, suitable or viable sites to accommodate the proposed scheme, having regard to flexibility.
- 7.3 In these terms, it has been demonstrated that the scheme complies with relevant town centre planning policy tests as set out within the NPPF and both the adopted and emerging Development Plan. Therefore, the application should be supported.

Appendix 1

SITE LOCATION PLAN



Key Plan

CDM

Notes

Revision

-	28.03.17	First Issue.
A	10.05.17	Building site orientation amended, detail added.
B	27.04.18	Draft Planning Issue
C	04.05.18	North entrance amended.
D	18.05.18	Draft Planning Issue
E	08.06.18	Building position amended to avoid tree RPA's.
F	14.09.18	Planning Issue
G	06.12.18	Amended Redline
H	31.05.19	Amended Ground Floor Layout
I	12.06.19	Amended layout to reflect changes to planning
J	27.06.19	Amended layout to reflect changes to planning

CLIENT

Redefine Hotels Reading Ltd.

PROJECT TITLE

Redefine Hotel, Reading

Site Location Plan

Planning

DRAWING NO.

0566_X_GA(XX)01_XX

REV.

J

SCALE@A1	DATE	ORIGINATOR	CHECKED
1:500	2019	JAH	SR

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Appendix 2

SEQUENTIAL SITE LOCATION PLANS

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SEQUENTIAL SITE LOCATION PLAN

Hills Meadow Car Park

George Street

READING



Scale @ A4 : 1:5000

Plan No. : 17-04763_SEQ02



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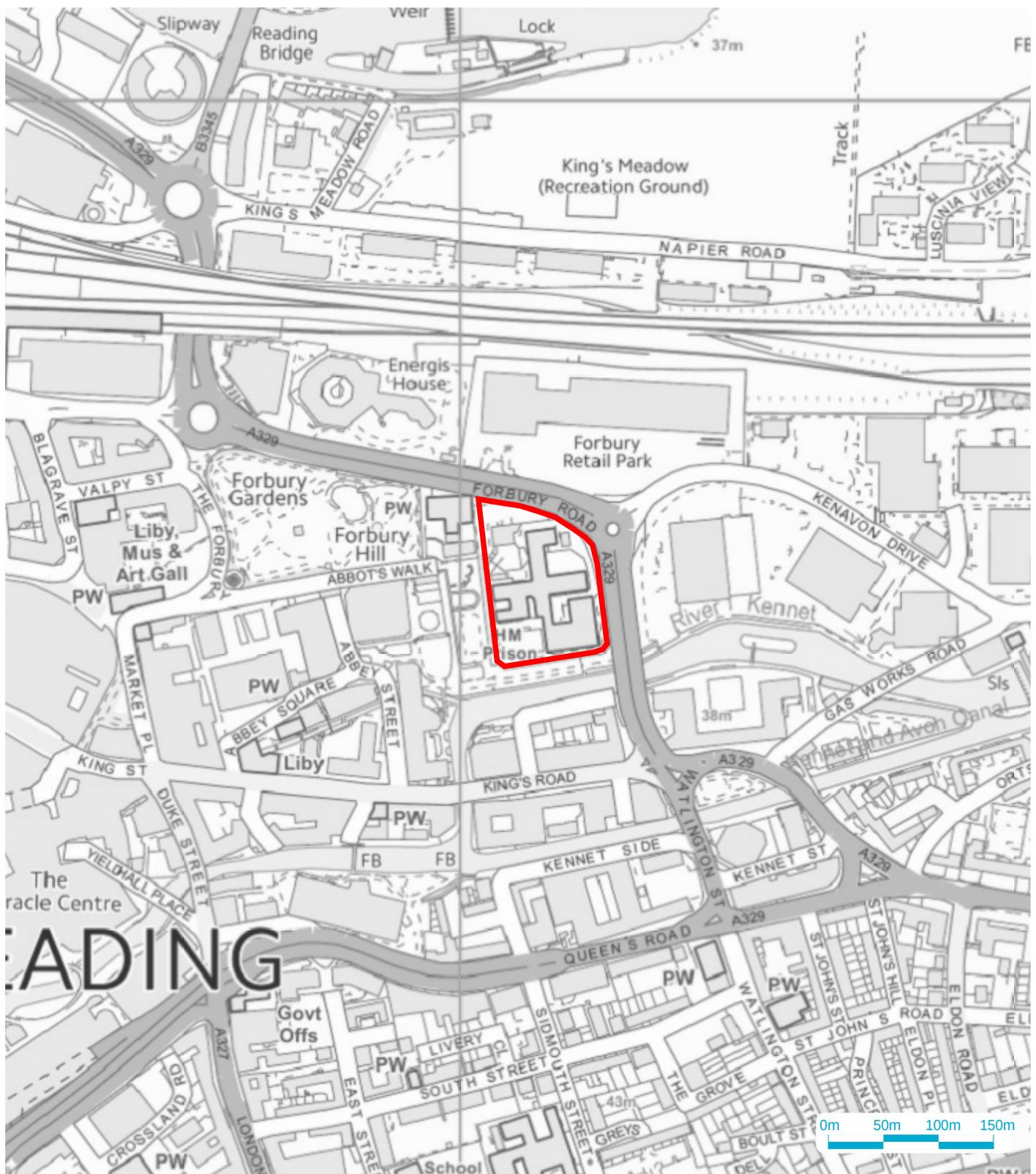
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SEQUENTIAL SITE LOCATION PLAN

Adopted Site Allocation RC3b

Reading Prison

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Scale @ A4 : 1:5000

Plan No. : 17-04763_SEQ03



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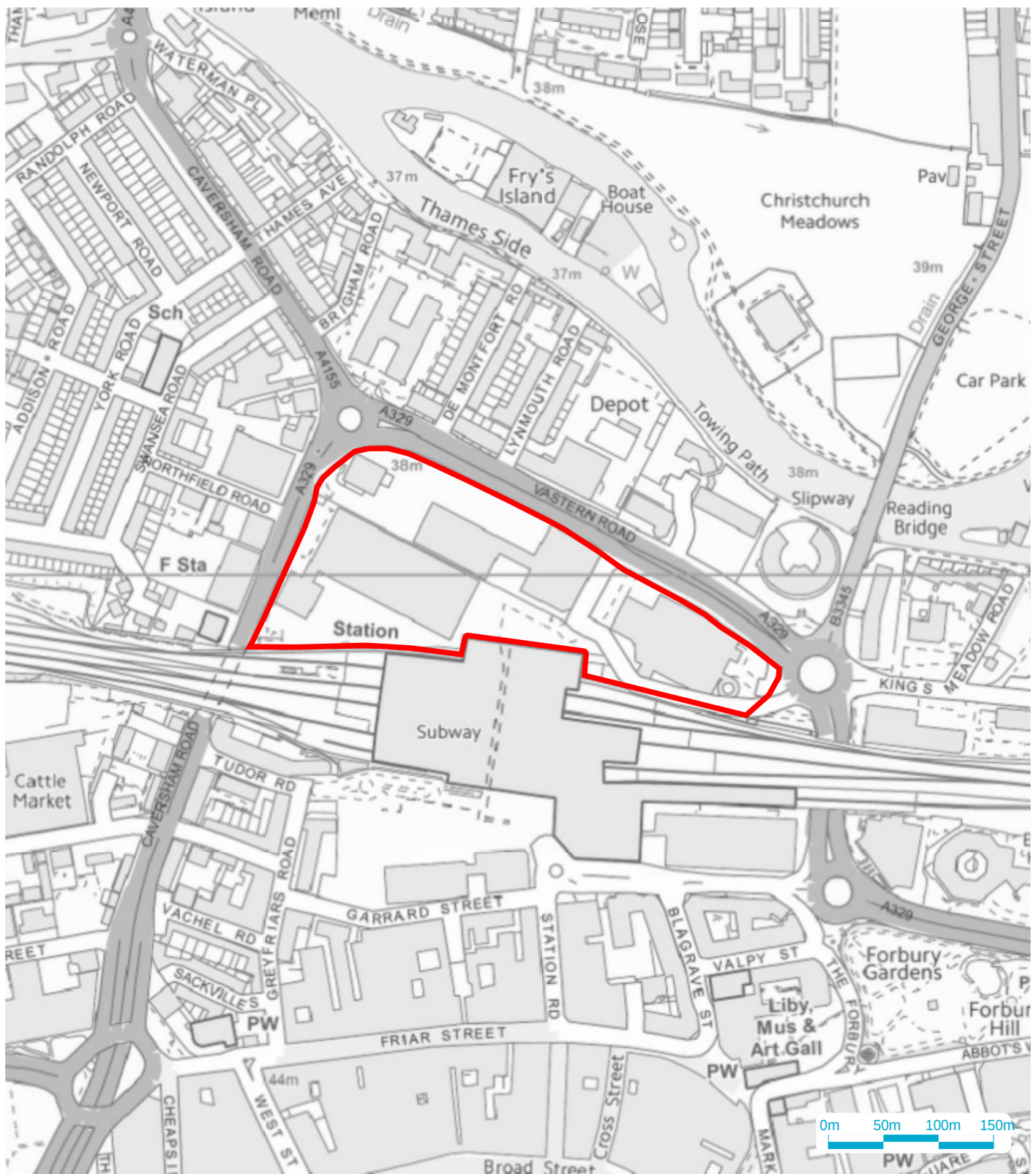
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SEQUENTIAL SITE LOCATION PLAN

Emerging Site Allocation CR11e
North of Station
READING



Scale @ A4 : 1:5000

Plan No. : 17-04763_SEQ04



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SEQUENTIAL SITE LOCATION PLAN

Emerging Site Allocation C12e

Hosier Street

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Scale @ A4 : 1:5000

Plan No. : 17-04763_SEQ05



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SEQUENTIAL SITE LOCATION PLAN

29-35 Station Road

READING

RG1 1LG



Scale @ A4 : 1:5000

Plan No. :



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