

Planning Statement prepared on behalf of
RBH Hospitality Management

Planning application for:
Redevelopment of former Crowne Plaza Hotel car park and
construction of new 132-bed hotel (Use Class C1), with
associated access, car parking and landscaping

LAND ADJACENT TO CROWNE PLAZA HOTEL, RICHFIELD AVENUE, READING, RG1 8BD

July 2019

Our Ref: AKH/17-04763



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Appendix 1 Site Location Plan

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 Planning Statement is prepared on behalf of RBH Hospitality Management and is submitted in support of a full planning application relating to the development of the site comprising the existing car park to the Crowne Plaza Hotel, Richfield Avenue, Reading, RG1 8BD, also operated by the applicant.
- 1.2 The application is a resubmission of a previous application (ref: 181056) submitted in June 2018, which was subsequently withdrawn in order to address the issues raised by Reading Borough Council Officers, principally relating to car parking associated with the development and impact on the Major Landscape Feature.
- 1.3 Accordingly, the application has been amended, with all supporting studies updated. An additional report has also been prepared assessing the impact of the development on the Major Landscape Feature, which is supported with verified wire line views.
- 1.4 The location of the application site is confirmed on the site plan attached at **Appendix 1**.
- 1.5 The application seeks full planning permission for a new 132-bed hotel, with ancillary facilities, comprising a café/breakfast room, meeting facilities and a small fitness room, together with associated car parking and landscaping.
- 1.6 Details of the scheme are presented on the following plans:
- Site Location Plan - 0566_X_GA(XX)01_XX Rev J
 - Site Plan - 0566_X_GA(XX)02_XX Rev F
 - Ground Floor Plan - 0566_X_GA(00)01_XX Rev G
 - First Floor Plan - 0566_X_GA(01)01_XX Rev B
 - Second Floor Plan - 0566_X_GA(02)01_XX Rev B
 - Third Floor Plan - 0566_X_GA(03)01_XX Rev B
 - Fourth Floor Plan - 0566_X_GA(04)01_XX Rev B
 - Roof Plan - 0566_X_GA(RF)01_XX Rev E
 - North + South Elevations - 0566_X_GE(NO-SO)01_XX Rev C
 - North + South Elevations - 0566_X_SE(NO-SO)01_XX Rev E
 - East + West Elevations - 0566_X_GE(EA-WE)01_XX Rev B
 - East + West Elevations - 0566_X_SE(EA-WE)01_XX Rev B
 - Topographical Survey - 18980-200-01T
 - Topographical Elevations Sheet 1 - 18980-100-02E
 - Topographical Elevations Sheet 2 - 18980-100-02E
- 1.7 A full description of the proposal is provided at section 3.
- 1.8 Additionally, the planning application is supported by the following technical reports/assessments and other material comprising:
- i) Design and Access Statement, prepared by Studio Anyo Architects;
 - ii) Hotel Sequential Assessment, by Rapleys;

-
- iii) Transport Statement, prepared by Vectos;
 - iv) Travel Plan, by Vectos;
 - v) Car Park Management Plan, by Vectos;
 - vi) Delivery and Servicing Plan, by Vectos;
 - vii) Tree Survey Report, Tree Constraints Plan and Arboriculture Impact Assessment, prepared by Squires Young;
 - viii) Landscape Planting Strategy and Landscape Planting Plan Ref: SY19-185-LPS-19-02, by Squires Young;
 - ix) Site Specific Flood Risk Assessment (including Sequential Assessment) and Drainage Strategy, by IMA Transport Planning;
 - x) Desk Study Assessment Report Ref. TM/C3932/7633, by Brownfield Solutions;
 - xi) Sustainability Report, by Steve Moseley Limited;
 - xii) BREEAM Pre-Assessment, by MRB Energy and Sustainability; and,
 - xiii) Townscape and Visual Impact Assessment prepared by Allen Pyke Associates.
- 1.9 The Planning Statement should, therefore, be read in conjunction with the plans and above supporting documents, the scope of which has been agreed with Council Officers through the pre-application process.
- 1.10 This Statement identifies planning issues relevant to the determination of the planning application. In particular, the Statement:
- i) Describes the site and surroundings, and planning background;
 - ii) Describes the formal content of the application;
 - iii) Reviews and appraises relevant planning policy and guidance;
 - iv) Describes the pre-application discussions held and summarises the relevant issues arising from these; and
 - v) Identifies and appraises relevant planning considerations.
- 1.11 The Summary and Conclusions section presents a brief review of the content of this Statement.

2 SITE AND SURROUNDINGS

THE SITE

- 2.1 The site, the subject of this Planning Application, can be appraised as follows.

LOCATION

- 2.2 The site lies approximately 1km to the north-west of Reading Town Centre and Rail Station. It is located to the north of Richfield Avenue, with access provided via Thames Side Promenade which also provides access to the adjacent Crowne Plaza Hotel and rowing club boat house and public car park.
- 2.3 The site currently comprises the private car park for the Crowne Plaza Hotel and extends to approximately 1.4 acres (0.11 ha).
- 2.4 A Site Location Plan is attached at **Appendix 1**.

TOPOGRAPHY

- 2.5 The site is a flat open car parking area, but supports a number of trees within the site and around the site boundary.

USE

- 2.6 The site comprises a private gated car park for use by customers of Crowne Plaza Hotel. Access is controlled via a barrier controlled entrance.

ACCESS

- 2.7 Access into the site is taken via Richfield Avenue, to the south of the site, for both vehicles and pedestrians, via Thames Side Promenade. This also provides access to the Thames riverside the boat club and public car park to the north of the site.

SURROUNDINGS

- 2.8 The site lies within a mixed use area, comprising existing hotels, business and other commercial uses including cafes/restaurants, BP garage and auto trade, and offices. Residential properties are also located at the Caversham Road/Richfield Avenue roundabout junction to the east and to the south of Richfield Avenue, opposite Thames Side Promenade. To the west of the site is the Rivermead Leisure Centre and a large area of open space.
- 2.9 As such, the proposal will be consistent with the mixed use character of the area, which includes two existing hotels.
- 2.10 Overall, the area comprises a mix of uses and architectural styles, of varying ages. Buildings generally extend up to three storeys, albeit the adjacent Crowne Plaza Hotel is of considerable scale and bulk, and the residential block opposite the site extends to four storeys.
- 2.11 Richfield Avenue supports substantial mature trees providing a buffer between the road and buildings.

3 DEVELOPMENT PROPOSAL

DESCRIPTION OF DEVELOPMENT

- 3.1 The description of development proposed in the planning application form is:

“Redevelopment of former Crowne Plaza Hotel car park and construction of new 132-bed hotel (Use Class C1), with associated access, car parking and landscaping”.

PLANNING APPLICATION

- 3.2 The proposal seeks full planning permission for the hotel development.
- 3.3 The application proposes a 132 bed hotel within a five storey building, comprising a reception area, café/breakfast area, a small gym and back of house facilities provided on the ground floor with four floors of accommodation above.
- 3.4 The building will be orientated in an east-west direction, following the alignment of Richfield Avenue and the neighbouring Crowne Plaza Hotel, and will be located centrally within the car park area.
- 3.5 The hotel will be of a slim rectangular form, with a mansard type roof. It will present a modern building, of simple form, with clean lines providing both horizontal and vertical emphasis through use of materials and fenestration.
- 3.6 The hotel will be constructed using a modular system, finished in high quality hand crafted brick reflecting Reading’s heritage of brick making. The chosen brick will reflect the pallet of colour provided by the trees around the site, providing its attractive setting.
- 3.7 Access will be derived from Richfield Avenue, along the Promenade providing access to the existing Crown Plaza car park.
- 3.8 The remaining car park will be reconfigured and will provide 118 spaces that will be shared with the Crowne Plaza Hotel. 6 disabled car parking spaces will be included, in addition to secure cycle parking.
- 3.9 It is also the intention that visitors to the new hotel will benefit from access to facilities within the Crowne Plaza Hotel.

AMENDMENTS

- 3.10 A number of changes are proposed as part of this resubmission application to address the issues raised by Reading Borough Council Officers. These include the following:
- Removal of all plant and associated screening from the rooftop, effectively reducing the height of the hotel by one storey and lessening the impact on the Major Landscape Feature;
 - Changing the profile of the roof from flat to mansard, reducing the overall volume and massing of the proposed hotel and as such lessening the impact on the Major Landscape Feature;
 - An alternative access is proposed to the north of the site which enables the retention of a TPO Plane Tree and improves visibility splays;
 - The external treatment of the hotel ensures a slender elegant block that is screened by existing and proposed planting and responds to the setting of the Major Landscape.
 - The revised scheme implements iterations to the façade of the building, using warm rich materials (in particular the highly textured brick) combined with refined detailing and

use of a copper and bronze detail creates a sense of elegance to the form of the building.

- An amended scheme comprising a total of 118 car parking spaces is proposed. In addition a revised car parking management strategy is proposed to monitor car parking demand in the Thames Side Promenade car park and on Caversham Road after the new hotel has opened.

4 PLANNING HISTORY

4.1 The Council's on-line records for the site date back to 1989. The applications are principally in relation to the Crowne Plaza Hotel, adjacent to the car-park.

These are as follows:

- Ref: 181056 - Redevelopment of former Crowne Plaza Hotel car park and construction of new 132-bed hotel (Use Class C1), with associated access, car parking and landscaping. Withdrawn 01/10/18.
- Ref: 121832 - Pollard 7no. Plane trees. Consent 25/10/12.
- Ref: 100629 - Various work to six Plane trees and one Lime tree including crown lifting, selective branch reduction, formative pruning and re-pollarding. Consent granted 10/06/10.
- Ref: 100208 - Pollard Plane trees T1-T7. Split Decision - (No confirmed outcome specified).
- Ref: 091721 - Advertisement consent for banner advertisements. Refused 2/2/10.
- Ref: 090157 - Re-pollard 7 Plane trees. Refused 9/11/09.
- Ref: 091232 - Discharge of conditions 2, 3 and 6 relating to planning consent 09/00054/FUL. Consent 4/08009.
- Ref: 090329 - Erection of T shaped pontoon at the river side of the Crowne Plaza Hotel and change of use of land for the permanent mooring of the vessel, Windrush, for guest accommodation ancillary to the use of the hotel. Consent 6/5/09.
- Ref: 081532 - Discharge of condition 13 of planning consent 04/00631/FUL. Consent 30/1/09.
- Ref: 081205 - Discharge of Conditions 4, 11, 13 and 14 of planning consent 04/00631/FUL. Consent 26/9/08.
- Ref: 071315 - Installation of an illuminated Health Club sign to east elevation. Consent 26/08/08.
- Ref: 050121 - Infill existing steps and replace existing handrails and paving to external terraces. Consent 11/1/06.
- Ref: 050864 - Conversion of existing roof space/plant rooms to form 10 new guest bedrooms. Consent 11/1/06.
- Ref: 051081 - 3 no. internally illuminated wall mounted building signs, 1 no. internally illuminated wall sign (Hotel apex), 2 no. internally illuminated totem signs, non-illuminated directional signage (located throughout carpark) and internally illuminated canopy signage (port cochere canopy) Consent 14/12/05.
- Ref: 050277 - New access ramp, entrance doors and minor extensions to front of existing hotel. Consent 22/08/05.
- Ref: 050275 - Installation of air-conditioning condenser units. Consent 12/6/05.
- Ref: 050500 - Installation of perimeter fencing and security lighting to existing hotel car park. Consent 21/3/05.
- Ref: 040940 - Ground floor extensions to hotel to provide an extended office area, a new lobby entrance, a new indoor swimming pool and changing facilities, a new

restaurant and meeting rooms. Conversion of existing public house to provide additional conference and meeting room facilities and conversion of existing meeting rooms to provide seven additional bedrooms. Consent 20/12/04.

- Ref: 930782 - Various post mounted and building mounted signs. Consent 28/9/93.
- Ref: 890310 - Extension to existing banqueting suite. Consent 14/6/89.

4.2 No details are available relating to the original planning permission for the Crowne Plaza Hotel.

4.3 There have been no previous development proposals relating to the car park area.

5 PLANNING POLICY

NATIONAL PLANNING POLICY

- 5.1 Central Government policy and guidance is set out in the National Planning Policy Framework (herein referred to as the “Framework”), which was published in February 2019. The main points, in so far as they relate to this proposal, are set out below.
- 5.2 The Framework identifies three key dimensions which the planning system can contribute towards in achieving sustainable development, namely:
- An economic role - by contributing to a strong, responsive and competitive economy;
 - A social role - supporting strong, vibrant and healthy communities, by creating a high quality built environment, and
 - An environmental role - contributing to protecting/enhancing the natural and built environment, including minimising waste and pollution and mitigating climate change.
- 5.3 The Framework confirms a presumption in favour of sustainable development is at the heart of both plan making and decision-taking. In terms of decision taking, paragraph 11 advises that local planning authorities (LPAs) should seek to approve development proposals which accord with the Development Plan without delay, whilst also granting permission for proposals in instances where the Development Plan is absent, silent or where relevant policies are out of date - unless any adverse impact in doing so significantly outweigh the benefits.

Building a Strong, Competitive Economy

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

Ensuring the Vitality of Town Centres

- 5.5 The Framework seeks to promote the role of town centres, which should be recognised by LPAs, when preparing Local Plans, as representing the heart of their communities where policies should support their viability and vitality.
- 5.6 It is confirmed that LPAs should apply sequential tests to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan.
- 5.7 It advises that when considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and LPAs should demonstrate flexibility on issues such as format and scale (paragraph 87).

Promoting Sustainable Transport

- 5.8 The Framework advises that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment, which should have regard to:
- Opportunities for sustainable transport modes;
 - Safe and suitable access for all people, and
 - Improvements that can be undertaken within the transport network.

5.9 The Framework advises that development should only be prevented or refused on transport grounds where the residual cumulative impact of development is severe (paragraph 109).

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

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

5.11 A key tool to facilitate this will be a Travel Plan and all developments which generate significant amounts of movement should be required to provide a Travel Plan (paragraph 111).

Requiring Good Design

5.12 The Framework advises that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development (paragraph 124).

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

- Function well and add to the overall quality of the area;
- Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places;
- Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks;
- Are sympathetic to the local character and history, and reflect the identity of local surroundings and materials while not preventing or discouraging appropriate innovation;
- Create safe and accessible environments, and
- Are visually attractive as a result of the architecture and appropriate landscaping (paragraph 127).

Meeting the Challenge of Climate Change and Flooding

5.14 The Framework advises that planning plays a key role in helping shape places to secure reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change and supporting the delivery of renewable and low carbon energy and associated infrastructure (paragraph 148).

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

- Comply with Local Plan Policies on requirements for decentralised energy supply, and
- Take account of land form, layout, building orientation, massing and landscaping to minimise energy consumption (paragraph 153).

5.16 In terms of flood risk, the Framework advises that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but

where development is necessary, making it safe without increasing flood risk elsewhere (paragraph 167).

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

Conserving and Enhancing the Natural Environment

- 5.18 The Framework sets a number of guidelines that seek to ensure the planning system contributes to, and enhances, the natural and local environment through, inter alia:
- Protecting and enhancing valued landscapes;
 - Minimising impacts on biodiversity and providing net gains where possible, and
 - Preventing development from contributing to, or being adversely affected by, unacceptable levels of soil, water or noise pollution.
- 5.19 Paragraph 117 confirms that decisions should encourage the effective use of land by re-using land that has been previously developed.

LOCAL PLANNING POLICY

- 5.20 The Development Plan for Reading Borough Council comprises the Core Strategy (January 2008 with alterations January 2015), the Sites and Detailed Policies Document (October 2012 with Alterations 2015) and the associated Proposals Map (October 2012).
- 5.21 The Proposals Map confirms the site falls within the borough's Settlement Boundary, where development is generally permitted, but outside the Central Core where "town centre uses" (including hotels) are to be located.
- 5.22 Additionally, the following allocations/designations apply;
- i) The site falls within Flood Zone 2, and
 - ii) It is within the Thames Valley Major Landscape Feature.
- 5.23 Additionally, the site is the subject of a Tree Preservation Order No. 118/09 which relates to 3 no. London Plane trees and 2 no. tree groups comprising 11 Alder trees.
- 5.24 Policies relevant to the proposed development are summarised below:

Core Strategy

- 5.25 Policy CS1: Sustainable Construction and Design - requires new development to make the most appropriate and efficient use of water, minerals, materials and other natural sources through consideration to layout and design. Developments of more than 1,000 sqm of floor space should ensure 50% of the provision meets the most up to date Eco-homes and BREEAM "excellent" standards and incorporates on-site generation of energy from renewable sources and energy efficient design measures to off-set at least 20% of predicted carbon dioxide emissions from the estimated energy usage of the development.
- 5.26 The application is supported with a Sustainability Report and BREEAM pre-assessment addressing these requirements.
- 5.27 Policy CS7: Design and Public Realm - advocates that development should be of high design quality that maintains and enhances the character and appearance of the area.
- 5.28 This is addressed in the accompanying Design and Access Statement.

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- 5.29 Policy CS2: Waste Minimisation - requires proposals to include measures to minimise the generation of waste in the construction, use and life of the buildings and promote sustainable approaches to waste management.
- 5.30 Policy CS4: Accessibility and the Intensity of the Development - states that the scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities.
- 5.31 The accompanying Transport Statement for the application considers these issues.
- 5.32 The associated Policy CS5: Inclusive Access requires buildings to be located, sited and designed to provide suitable access for all potential users including disabled people.
- 5.33 Policy CS8: Water Spaces - advises that Reading's water spaces will be protected to ensure they continue to contribute to biodiversity and ecology, local character and visual amenity and provide leisure and recreational opportunities. As such, development should, inter alia, provide appropriate, attractive uses and buildings that enhance the relationship of buildings, spaces and routes and creates a high quality public realm.
- 5.34 It is confirmed in Policy CS9 Infrastructure, Services, Resources and Amenities that the Council will seek to ensure that development proposals will not impact - or will mitigate impact - on infrastructure, services, resources, amenities or other assets lost or impacted on to ensure development is sustainable. This may be achieved through planning obligations set out in associated Supplementary Planning Documents.
- 5.35 Policy CS22: Transport Assessment - confirms that planning permission will not be granted unless development proposals make appropriate provision via works/contributions to ensure an adequate level of accessibility and safety by all modes of transport is achieved.
- 5.36 Policy CS24: Car/Cycle Parking - advises that maximum car parking standards and cycle parking requirements will be applied in relation to the accessibility of locations to sustainable transport facilities.
- 5.37 In terms of town centre uses, Policy CS25: Scale and Location of Retail, Leisure and Cultural Development states that major retail and main town centre leisure and cultural development will take place in, or as an extension to, the centre of Reading. Where a need for additional development has been identified and not sites are available in or adjoining the centre, a sequential approach should be applied.
- 5.38 The application is supported by a Sequential Assessment addressing this policy requirement.
- 5.39 Policy CS34: Pollution and Water Resources - advises that development will be permitted where it would not be damaging to the environment through air, land, noise or light pollution; where it would preserve or ideally enhance ground and surface water quality and where sewage and waste water treatment infrastructure are adequate to support the development.
- 5.40 In terms of flood risk, Policy CS35: Flooding states that planning permission will not be permitted for development in an area identified as being at high risk of flooding where the development would reduce the capacity of the flood plain, impede the flow of flood water or in any way increase the risks to life and property arising from flooding.
- 5.41 The application is supported by a Flood Risk Assessment and Drainage Strategy (including a Flood Sequential Assessment) demonstrating that the proposal is satisfactory in terms of Policy CS35.
- 5.42 Policy CS37: Major Landscape Features and Strategic Open Space advises that planning permission will not be granted for any development that would detract from the character or

appearance of areas designated as a Major Landscape Feature (which encompasses the Thames Valley within which the application site is located).

- 5.43 Policy CS38: Trees, Hedges and Woodlands advises that individual trees, groups of trees, hedges and woodlands will be protected from damage or removal and the borough's vegetation cover will be extended.
- 5.44 The planning application includes a Tree Survey, Arboriculture Impact Assessment and a landscape proposal detailing how the development will protect existing trees, and introduce additional planting as mitigation for the loss of trees located within the site, required to facilitate the development.

Sites and Detailed Policies Document

- 5.45 In addition to the above policies, the Sites and Detailed Policies Document contains policies setting out detailed development management considerations that will be relevant to the new hotel proposal. The following are considered relevant.
- 5.46 SD1: Presumption in Favour of Sustainable Development - advises that a positive approach to considering development proposals will be taken that reflects a presumption in favour of sustainable development. The Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible to secure development that improves the economic, social and environmental conditions in the area.
- 5.47 DM1: Adaptation to Climate Change - advises that development should include measure to adapt to climate change, including:
- Careful orientation to maximise opportunities for natural heating / ventilation and reducing exposure to wind and other elements;
 - Incorporating trees and other planting as part of a landscape scheme providing shading, and
 - Minimising surface water run off through the design of the drainage system.
- 5.48 Policy DM2: Decentralised Energy - advises that development in excess of 1,000 sqm should consider inclusion of CHP plant or biomass - fuelled heating scheme, or other form of decentralised energy provision.
- 5.49 Policy DM3: Infrastructure Planning - requires development to make appropriate provision for infrastructure, which will be secured through planning obligations and / or CIL. This may include transport infrastructure and economic development services and infrastructure, including skills and training development initiatives, and flood mitigation and prevention and measures.
- 5.50 Policy DM12: Access, Traffic and Highway-related matters - advises that development that generates additional trips on the transport network should give consideration to the effect on safety, congestion and the environment. Development will only be permitted where, inter alia, it would not have a material detrimental impact on the functioning of the transport network for the safety of users, including pedestrians and cyclists.
- 5.51 Policy DM18: Tree Planting - advocates that new development makes provision for tree planting within the application site, or off-site in appropriate situations to improve the level of tree coverage within the borough and maintain and enhance the character and appearance of the area and to provide for biodiversity and contribute to measures to reduce carbon and adapt to climate change.

Supplementary Planning Guidance

- 5.52 In addition to adopted planning policies, development proposals will also be considered in the context of any relevant planning guidance prepared by the Council in support of its adopted policies. The following guidance is considered relevant and has been taken into account in the preparation of the proposals and supporting documentation for the application.
- i) Revised Parking Standards and Design SPD (October 2011)
 - ii) Planning Obligations Under Section 106 SPD (April 2015)
 - iii) Employment, Skills and Training SPD (April 2013)
 - iv) Sustainable Design and Construction SPD (April 2011)

Emerging Local Plan

- 5.53 In addition to the above, the Council is progressing a new Local Plan.
- 5.54 The draft Local Plan has progressed to the Pre-Submission Draft 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 12th June 2019 and Wednesday 24th July 2019.
- 5.55 Emerging policy includes no site-specific policies relating to the Crowne Plaza Hotel that impacts on the relevant planning policy considerations outlined above.
- 5.56 Planning policies as detailed in the emerging plan that are relevant to application are set out below:
- 5.57 Policy RL5: Impact of Main Town Centre Uses: Confirms proposals that include more than 1,000 sq m (gross) of new or additional floorspace for main town centre uses in an edge-of-centre or out-of-centre location should demonstrate that there will be no significant adverse impact on existing centres;
- 5.58 Policy TR5: Car and Cycle Parking and Electric Vehicle Charging: States that Development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport. In addition, development should make the following provision for electric vehicle charging points:
- All new houses with dedicated off-street parking should provide charging points;
 - Within communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point.
- 5.59 The emerging Local Plan represents a material consideration, albeit weight to be attached to the draft policies will be necessarily limited.

SUMMARY

- 5.60 Overall, in terms of national and local planning policies and guidance the following should be acknowledged:
- i) In land-use terms, policy seeks to focus new development for main town centre uses within Reading town centre. A sequential approach will be required for proposals that are not within the town centre. Subject to satisfying the

sequential approach, the hotel proposal is considered to be acceptable in principle. The site is in a sustainable location within walking distance of Reading town centre and train station.

- ii) The site falls within Flood Zone 2. As such a sequential approach will also be required to demonstrate there are no suitable alternative sites within Flood Zone 1.
- iii) The site lies within (albeit on the periphery of) a Major Landscape Feature. Any proposal will therefore need to demonstrate there is no significant impact on the character and appearance of the Landscape Feature. In this context, the site sits between two existing hotels (one of which also lies within the Landscape Feature designation) and comprises an existing car park. It is demonstrated within the application submission that the proposal will have no significant impact.
- iv) The proposal will need to demonstrate compliance with relevant development management and technical considerations, including design, transportation, drainage and energy.

5.61 The individual merits of the proposal are reviewed fully, in the context of the planning policy framework outlined above, in Section 7 of this Statement.

6 PRE-APPLICATION CONSULTATION

- 6.1 The Framework outlines the need for effective consultation as part of the development process in association with the preparation of planning applications.
- 6.2 In this regard, the applicant has sought to secure the involvement of Officers from the earliest stage, as part of a pre-application process prior to the submission of the previous application in June 2018. The applicant attended a preliminary meeting with the Planning Officer, Susanna Bedford, in July 2017, to seek initial feedback on a proposal for redevelopment of the Crowne Plaza Hotel car park for an additional hotel.
- 6.3 This was subsequently followed with a formal request for pre-application advice, submitted by Rapleys, in December 2017, together with a pre-application design document, prepared by Studio Anyo Architects. Additionally, a Transport Scoping Report, prepared by the applicant's transport consultant at Vectos, was submitted to Reading Borough Council Highway Officers.
- 6.4 A subsequent meeting was held in March 2018 and formal written pre-application feedback from Reading Borough Council was received, on 24 April 2018. This set out a series of key planning issues which are summarised as follows:

Principle of Use - The site lies outside the town centre and the Reading Central Area where major leisure, cultural and non-regionally significant tourism development will be focused. A sequential approach will be required to demonstrate there are no alternative sites available within the town centre suitable for hotel development.

Flood Risk - The site is within Flood Zone 2 (albeit it was formally considered to be within Flood Zone 3a). A Flood Risk Assessment will therefore be required. Additionally a Sequential Test should be applied for development outside of Flood Zone 1, which must demonstrate that there are no suitable sites within Flood Zone 1 anywhere in the borough. SUDS information may also be required.

Design - The site is located within the designated Major Landscape Feature. Existing buildings surrounding the open space and fronting the riverside are of a smaller scale. It is considered that any building should be less visually intrusive within the Landscape Feature than the existing hotels to prevent a cumulative effect that would detract from the character and appearance of the Landscape Feature. It should also be demonstrated there would be no overlooking to adjacent hotels. Materials should be good quality.

Highways - The proposal will reduce vehicle movements on the basis that overall parking is reduced, which is acceptable in principle. The Transport Statement should, however, fully address:

- Vehicle impact including taxi drop off / pick up;
- Impacts arising from visits to the other hotel facilities i.e. meetings, weddings, restaurant etc.;
- Servicing arrangements, and
- How car parking will be managed across the two hotels.

Additionally, the proposal will increase pedestrian movements and it is likely a contribution towards upgrading the Richfield Avenue pedestrian crossing will be requested.

Protected Trees - The proposal will result in the loss of TPO trees within the car park and adjacent to the highway. The site is identified in Reading's Tree Strategy as being important for tree planting and retention. The proposal will require arboriculture

justification to be provided to warrant the removal of the TPO trees and a meaningful tree planting scheme submitted to replace the lost amenity.

Ecology - It is unlikely that the site is of great significance to any protected species. Precautionary measures should be implemented (i.e. ensure that any vegetation removal is undertaken outside of the bird nesting season). Additionally, a wildlife-friendly lighting scheme and biodiversity enhancements should be provided.

Sustainability - The scheme should achieve minimum 50% BREEAM level “excellent” and the remainder at BREEAM level “very good”. Where this split is not appropriate for the development, the proposal should achieve a BREEAM score of 62.5%.

Contaminated Land - The site may lie above a former landfill site, with potential for soil contamination to have occurred and ground gases to be present. A land contamination report should be provided.

Community Infrastructure Levy - The proposal will be liable to CIL.

Section 106 - Matters that are likely to be included as part of any S106 Agreement comprise affordable housing, employment skills and training, highway works and public realm works.

- 6.5 Following the submission of the full planning application (Ref. 181056), a range of issues were raised by Statutory Consultees and the Local Planning Authority relating to:
- The loss of 1 TPO London Plane tree;
 - Car parking provision;
 - Visibility splays;
 - Flood risk; and,
 - Height, scale and massing of the proposed hotel.
- 6.6 As a consequence, the application was withdrawn to allow for ongoing negotiations with Officers. The applicant held a further pre-application meeting in February 2019 to explore the issues further and seek a way forward in order to progress a new application.
- 6.7 In tandem, direct discussions were held between the applicant’s flood risk advisor and the Environment Agency.
- 6.8 In accordance with the issues identified above the following alterations to the proposed scheme have been made:
- Access Arrangements - An amended access to the north of the site is proposed. This ensures the retention of the 1 TPO Plane Tree and increases visibility splays.
 - Changes to Landscape Planting - Incorporating alternative tree species as part of the application scheme, to increase biodiversity and to take into account global warming and climate change.
 - Design - Reducing the scale, height and massing of the proposed development (by one storey), by removing the plant and associated screening from the rooftop and changing the profile of the roof from flat to mansard.
 - Materials - The scheme incorporates a number of changes to the palette of materials being used to provide enhanced warm, rich appearance to the façade. These include highly textured brick, metal cladding in brass colour and metal cladding in copper colour.

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- Highways - The car parking management strategy has been significantly enhanced to better monitor car parking demand in the Thames Side Promenade car park and on Caversham Road after the new hotel has opened.

6.9 Overall, in the context of the above the following can be established:

- i) Subject to addressing the sequential approach for main town centre uses, and the location of development outside Flood Zone 1, a hotel use can be considered acceptable, in principle;
- ii) The application has been significantly amended to demonstrate its acceptability in design and layout terms, in the context of its setting within a Major Landscape Feature.
- iii) The application is supported with a robust approach to car parking that will ensure the development does not give rise to any significant impact on on-street car parking, and
- iv) Provided the application fully addresses the key development management matters highlighted, it is considered to be acceptable in planning policy terms and capable of securing planning permission.

6.10 The following section provides an assessment of the development proposals in the context of this pre-application advice and relevant planning policies.

7 PLANNING CONSIDERATIONS

7.1 From the proceeding review and analysis of planning policy, and pre-application discussions with Officers at Reading Borough Council, the key planning issues relevant to the determination of this application are as follows:

- i) Conformity with the Development Plan;
- ii) Principle of use;
- iii) Design quality;
- iv) Landscape impact;
- v) Trees;
- vi) Environmental considerations;
- vii) Access, transportation and car parking, and
- viii) Planning obligations.

DEVELOPMENT PLAN

7.2 Section 70(2) of the Town and County Planning Act requires that local planning authorities should have regard to the provisions of the Development Plan in determining applications. The emphasis on “plan-led” decision making was given further weight in Section 37(6) of the Planning and Compulsory Purchase Act 2004, which requires that the determination must be made in accordance with the plan unless material considerations indicate otherwise.

7.3 In these terms, the following analysis and commentary demonstrates that the proposal does not offend the terms of the Development Plan but rather conforms to its provisions. Thus, it must be acknowledged that the proposal is acceptable and supportable in planning policy terms.

PRINCIPLE OF USE

7.4 The site is located adjacent to the Central Area boundary and 550m from the central core (the town centre boundary) measured along Caversham Road. Although the site is therefore located close to Reading’s Central Area, it is over 300m from the town centre boundary and therefore occupies an ‘out of centre’ location in planning policy terms.

7.5 Adopted policies seek to direct major retail and main town centre leisure and culture development within the centre of Reading, or as an extension to it. A sequential approach should be adopted for any development that proposes a main town centre use that is not within the town centre, to identify any potential alternative sites that are sequentially preferable.

7.6 Accordingly, the planning application is supported by a Hotel Sequential Assessment, the scope of which was initially agreed with the Planning Officer during the initial pre-application discussion on 14th March 2018, including the appropriate parameters for the site search exercise having regard to the requirement to adopt a flexible approach, and the identification of relevant sites for consideration.

7.7 Notwithstanding, following pre-application discussions in February 2019 at the Reading Borough Council offices, Case Officers provided comment on two further sites that should be considered as part of a further sequential assessment to support a secondary submission. Following a review of these, only one site, No 1 Reading, 29 Station Road, fits the parameters of the sequential assessment. As such, this has been included within the assessment.

- 7.8 The following 6 sites have been reviewed for the purposes of the Sequential Assessment;
- Abattoirs Road;
 - Hills Meadow Car Park, George Street; 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.
- 7.9 Each site was assessed in terms of:
- 7.10 Availability - whether the sites are available now or likely to become available for development within a reasonable time;
- 7.11 Suitability - whether due regard has been given to the requirements to demonstrate flexibility, and
- 7.12 Viability - whether development would be viable on the sites.
- 7.13 The detailed assessment is presented in the accompanying Hotel Sequential Assessment. This finds that none of the sites assessed were found to be sequentially preferable when compared to the application site, for reasons relating to their availability, their size, configuration and/or location (suitability), 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.
- 7.14 In these terms, the proposal satisfies the relevant town centre policies relating to main town centre uses and the principle of hotel development at the site is therefore considered to be acceptable, in land use terms.

DESIGN QUALITY

- 7.15 The proposal will deliver a new 132-bed hotel. The accompanying Design and Access Statement (DAS) outlines the general brief, which seeks to provide accommodation that meets the needs for an economy hotel that provides a consistent quality of service and strong value.
- 7.16 The DAS sets out the design approach adopted for the hotel, in terms of the requirement set by the brief, a site analysis (including identification of constraints), options for the layout and orientation (and why the approach adopted is preferred), and how materials selected for the building have been chosen.
- 7.17 The brief confirms that the new hotel must support a minimum of 132 bedrooms in order to deliver a viable scheme. Options for accommodating this within the existing site have been explored by Anyo, in a way that offers the most efficient use of the site, whilst seeking to respect its setting.
- 7.18 As part of the revised application the scale, height and massing of the proposed development has been reduced by one storey. This has been achieved by removing the plant and associated screening from the rooftop and changing the profile of the roof from a flat roof to mansard style.
- 7.19 Verified Wire Line drawings showing the height of the original proposal and the revised scheme have been submitted as part of the application, which clearly show that the proposed hotel will be heavily screened by existing trees from surrounding viewpoints. Furthermore, its footprint and massing is entirely consistent with surrounding built form.

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- 7.20 The new hotel is now below the ridgeline of the adjacent Crowne Plaza hotel, further enhancing the relationship of the massing between both buildings.
- 7.21 In addition, the revised scheme avoids replicating the design vernacular of the nearby Crowne Plaza / Boat House / Premier Inn which is generally recognised as dated and unsympathetic.
- 7.22 Whilst the building is horizontal in form, the fenestration provides vertical emphasis and interest, and provides a reference to the vertical nature of the trees that characterise the site's setting.
- 7.23 It is confirmed that a high quality hand crafted long brick material has been selected, both for its reference to Reading's heritage of brick making, and for the quality of the material and the range of colour and tone that it offers, reflecting the range and warmth of colour provided by surrounding trees. The revised scheme implements iterations to the façade of the building, using warm rich materials (in particular the highly textured brick) combined with refined detailing and use of a copper and bronze detail creates a sense of elegance to the form of the building.
- 7.24 Overall, the hotel will comprise a modern building with clean lines and will use high quality materials to create a sense of elegance and simplicity.
- 7.25 The new hotel is 'double fronted' in that both the north elevation, facing the River Thames, and the south elevation, facing Richfield Avenue, include a main entrance to the reception area and public areas of the hotel, with the back of house functions confined to each end of the hotel. This achieves good connectivity through the site, allowing guests direct access to either car parking areas and River Thames / Richfield Avenue, whilst also providing active frontages on the two key elevations.
- 7.26 The proposal complies with relevant requirements to ensure the new hotel is accessible to all.
- 7.27 It will have no detrimental impact, in terms of amenity of the neighbouring hotels, which are located some distance away and with no direct overlooking possible.
- 7.28 Overall, it is considered that the revised development provides a high quality design that maintains and enhances the character and appearance of the area. It represents sustainable development by seeking to make efficient use of previously developed land, whilst ensuring that it meets relevant standards and design considerations, discussed further below.

LANDSCAPE IMPACT

- 7.29 As confirmed previously, the site sits within, albeit on the periphery of, a Major Landscape Feature (MLF) (Thames Valley), where Policy CS37 advises that planning permission will not be granted for any development that would detract from the character or appearance of a designated Major Landscape Feature.
- 7.30 Supporting text provides further clarification. This states that
- "New development should seek to maintain and enhance the natural beauty and visual amenity of the Borough's open space and landscape areas. Development resulting in the loss of existing landscape features or detracting from the character or appearance of the Borough's major landscape areas will be resisted. The extent to which new development prevents or lessens the visual impact on major landscape features and other landscape values is largely dependent on the location, design and scale of proposals".*
- 7.31 The Thames Valley MLF effectively follows the River Thames corridor and open space contiguous with the River. The obvious anomaly with this designation is the inclusion of the

Boat House, public car park, Crowne Plaza hotel and its car park (the application site) and the Rivermead Leisure Centre, which clearly do not comprise open space or represent a landscape feature. In this context, it is noteworthy that the adjacent Premier Inn, Toby Carvery and associated car parking are, however, excluded.

- 7.32 To this extent, it must be acknowledged that the application site makes little positive contribution to the Thames Valley MLF. Rather, it clearly comprises part of the urban environment, together with the Boat House, adjacent public car park, Crowne Plaza, Premier Inn, Toby Carvery and Rivermead Leisure Centre, which effectively form the extent of the urban boundary with the MLF and its associated open space.
- 7.33 In support of this application, a Townscape and Visual Impact Assessment (TVIA) has been submitted. The TVIA has been prepared following pre-application discussions with Reading Borough Council with the aim of assessing the predicted impacts on visual receptors currently enjoying views from the designated landscape and historic areas.
- 7.34 The TVIA demonstrates that the scheme proposals will have no residual significant adverse effects on visual receptors within the designated areas and that the new built form will be appropriate in the context of the existing settlement pattern along the Thames Promenade. Further, the scheme proposals will not detract from the character or appearance of areas designated as a Major Landscape Feature and will maintain the natural beauty and visual amenity of the Borough's open space and landscape areas. The scheme proposals present an opportunity to improve near distance views by enhancing boundary treatments where they currently detract from the scenic quality. Additionally, there will be limited effects on any significant views with historic interest which are identified in planning policy.
- 7.35 Included within the DAS are a number of visualisations showing the new hotel within the context of surrounding development. Additionally, verified wire line views are submitted to support the scheme. These demonstrate a magnitude of change compared to the previously submitted scheme and demonstrate that the majority of the visual effects from revised proposal will be minor due to the nature of the intervening townscape and the mature landscape elements which form the setting to the Thames Promenade and the St Peters Conservation Area.
- 7.36 The TVIA concludes confirming the location, design and scale of the proposals will be appropriate to the existing townscape setting and will result in a well-designed scheme sympathetic to the surrounding built environment and townscape setting. It will provide an innovative enhancement to the existing townscape. As such the scheme proposals respond to planning policy guidance and objectives at a national and local scale.

TREES

- 7.37 It is acknowledged that the application site supports a significant number of trees - some of which are subject to a Tree Preservation Order (No. 118/09) - and thereby contribute to the general amenity of the area.
- 7.38 The Tree Survey provided in support of the application outlines the quantum and condition of existing trees at the site. This confirms that a total of 29 trees, together with 3 groups, were surveyed of which:
- i) None were classified as BS5837 Category A, representing trees of high quality and value;
 - ii) 6 were classified as Category B (of moderate quality), which represent trees which should be retained wherever possible. These trees mainly provide screening and make up part of the wider street scene;

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- iii) 22 trees were identified as Category C (of low quality), which represent trees of very limited merit or impaired condition, due to past management or structural defects, and
 - iv) 1 was graded U (in such condition that it cannot be realistically retained).
- 7.39 In this context, wherever feasible, the scheme has been designed to enable the retention of as many trees as possible. Importantly, the revised scheme now ensures the retention of 3 TPO Planes trees, located just outside the site boundary. However, due to the quantum and distribution of trees throughout the site, it has not been possible to retain all trees.
- 7.40 The Arboricultural Impact Statement assesses the impact of the final scheme proposal on existing trees within the site. This confirms that a total of 15 trees would require removal, including 11 'C' rated Alder Trees which are of poor quality, with poorly shaped canopies, some dead wood and poor forks (including a dead specimen T22) and 1 'C' rated Crack Willow, which is a large tree with dead wood and in need of hard pruning due to overhanging in the car park. Only 1 Category 'B' tree would be lost.
- 7.41 In this context, a Landscape Planting Strategy, together with a Landscape Planting Plan has been prepared. This acknowledges that it is important to demonstrate that any proposed 'mitigation planting' will provide a net gain in the tree stock on the site, whilst also allowing enough room for the trees specified to grow well and achieve their full potential. In accordance with the revised landscaping scheme planting distances for indigenous screening has changed from 800mm to 500mm.
- 7.42 The Reading Tree Strategy (June 2010) document has also been taken into account in selecting the trees to plant and in terms of its recommendations to increase biodiversity and in relation to global warming and climate change.
- 7.43 In total, 31 new trees, together with almost 200 sq.m of semi indigenous hedging is proposed, representing a net gain of 16 new trees (and hedging). The use of the selected Salix alba form 'Britzensis' will add interesting colour with its orange-red stems.
- 7.44 In summary, therefore, proposals will only result in the loss of 1 Category 'B' trees (a small tree of low landscape quality), all other trees to be removed are Category 'C' (trees of low quality). Furthermore, the extent of mitigation proposed is considered to more than off-set the trees to be lost.
- 7.45 New planting will include additional boundary trees and hedging to supplement the screening afforded by existing trees, particularly along those boundaries where none currently exists. Planting is also proposed within the site, which will break-up the hard standing areas and provide a soft interface with the new hotel. The rationale for the species chosen in presented in the Landscape Planting Strategy.
- 7.46 Overall, the proposal is considered to be consistent with both Policy CS37 and Policy CS38 (Trees, Hedges and Woodlands). It will provide a high quality development with a comprehensive landscape strategy to further enhance the development and its setting, to the benefit of the wider MLF.

ENVIRONMENTAL CONSIDERATIONS

- 7.47 The application is supported by a Phase 1 Contamination Report, Sustainability Report and a Flood Risk Assessment (FRA) and Drainage Report that consider any likely environmental impacts arising from the proposal. These are summarised below.

Contamination

- 7.48 The Phase 1 contamination report identifies that, according to Environment Agency records, the site is located on the site of a former landfill active between 1970 and 1979. However, historical mapping appears to contradict this, therefore, a request has been made to the Environment Agency for further details on the landfill site.
- 7.49 Other historical site uses include a former cart track, which has been infilled.
- 7.50 In terms of on-site human health risks, historic landfill sites could be the source of a range of contaminants, including heavy metals, solvents, leachates, hydrocarbons, etc. which pose a moderate risk to human health through ingestion of contaminated soils. There is an additional potential for ground gas beneath the site which poses a high level of risk to property and end-users. However, this is subject to further details about the landfill site from the Environment Agency.
- 7.51 The made ground associated with the cart track and car park also poses a moderate risk to human health, through contamination by metals and polycyclic aromatic hydrocarbons (PAHs) associated with the made ground and ground gases associated with the infilled ground.
- 7.52 There is a lower risk of contamination from fuels and oils from the current car park, nearby car parks and boat houses. There is also a low risk from off-site industrial activities and nearby electricity substations.
- 7.53 The site is underlain by a Principal Aquifer and located adjacent to the River Thames and a Secondary A Aquifer. There is a moderate risk to controlled waters by migration of contaminants through groundwater or granular soils from the on-site sources mentioned above.
- 7.54 Due to the underlying flint-bearing chalk bedrock, the British Geological Survey have indicated there is a moderate maximum compressible ground stability hazard.
- 7.55 Therefore, intrusive site investigations are recommended to confirm and investigate the preliminary findings set out in the Phase 1 study.

Sustainability Report

- 7.56 The Sustainability Report seeks to address the planning policy requirements of Reading Borough Council relating to sustainable construction and technologies that reduce overall impact on energy consumption.
- 7.57 Policy confirms that the target is for new development to achieve a BREEAM score of 62.5 (i.e. between 'very good' and 'excellent').
- 7.58 The Report provides an assessment of the energy consumption and associated carbon dioxide emission reductions for the proposed development using predicted consumption data. It identifies the target amount of energy generation and carbon savings to be provided from decentralised energy and on-site renewable generation technology.
- 7.59 The assessment follows the energy hierarchy to firstly reduce the energy demand followed by incorporation of low energy lighting and efficient systems before incorporation of decentralised and renewable technologies.
- 7.60 The Report confirms that a range of energy efficient and demand reduction measures will be adopted, including:
- i) Improved U values of the external envelope and glazing.

- ii) Improved air permeability of the building envelope.
 - iii) Improved efficiency of space heating and cooling.
 - iv) Use of energy efficient lighting and intelligent lighting controls.
 - v) Use of variable speed pumps, fans and drives to match supply and demand.
 - vi) Improved efficiency of heat recovery to mechanical ventilation systems.
- 7.61 The scheme will also incorporate facilities for decentralised energy with Combined Heat and Power (CHP) to meet the hot water requirement for the hotel. Air source heat pumps are also incorporated as a source of renewable energy through meeting a proportion of the heating and cooling demand.
- 7.62 To meet the Councils' policy of 20% improvement over Building Regulations, the building should target 243,474 kgCO₂/annum. The CO₂ emissions of 201,493 kg associated with the proposed hotel are 41,981 kg below the Core Policy CS1 target, thereby demonstrating full compliance with the Council's policy requirement.
- 7.63 The application is also supported with a BREEAM Statement and BREEAM Pre-assessment. This concludes that the scheme can achieve 59.52% of the credits to exceed the 55% threshold BREEAM 'Very Good' rating, but falls slightly below the Council's target of 62.5%. However, due to commercial and site constraints the higher target cannot be achieved and as such, it is requested that a minimum target rate of 55% is accepted.

Flood Risk and Drainage

- 7.64 Following extensive engagement with the Environmental Agency, a revised Site Specific FRA and Drainage Strategy has been submitted in support of the application which takes into account new data in relation to the risks associated with flooding at the site, relative to the River Thames and other sources including groundwater, surface water and sewers. It confirms the site lies within Flood Zone 2 (as does all land to south of the site including the adjacent Premier Inn hotel and nearby residential properties), with all other sources representing low risk - or no risk - to provide an overall 'flood vulnerability' of low risk. The development type is deemed to be an appropriate form of development within Flood Zone 2. Significantly, the updated data confirmed that the risk of flooding was reduced compared to the time of the EA's original objection and as such the scheme can be supported from the EA.
- 7.65 In accordance with the requirements set out in the Framework, the FRA includes an assessment of potential alternative sites within the borough that occupy areas of lower flood risk (i.e. Flood Zone 1). This assessment finds no sites that are considered suitable, either because these do not attract a lower flood risk than the application site, or because the sites do not offer a comparable or appropriate development area. Consequently, the assessment considers the 'Sequential Test' is passed.
- 7.66 The assessment calculates the greenfield runoff for the development site and the estimated run-off rate from the current car park and provides a proposed drainage strategy that seeks to provide a significant improvement upon the current site performance, such that the development site more closely mimics the greenfield performance.
- 7.67 The strategy recommends the following:
- Ground investigation works be carried out to establish the suitability of the site to support SuDS drainage techniques, in particular infiltration drainage;
 - The topographical survey be updated, to establish levels for discharge to the land drainage ditch beyond the southern boundary;

- Undertake further investigation to confirm the location of any existing statutory services, or land drainage within the site and requirement for diversions;
- Where feasible, utilise SuDS to manage surface water run-off, and maintain the current contribution to the greater catchment area to greenfield run-off rates and improving this where possible;
- Management to subscribe to the local flood warning alerts, thus allowing safe egress, which, due to the associated minimal flood water depths, would be possible during “the most” extreme flood events;
- Discharge into a local land drainage feature as the proposed drainage solution for surface water (or if not feasible, utilise a connection to the existing public surface water sewer below Thames Side Promenade), and
- Provide a dry access and evacuation route within the site for the 1 in 100 year event.

7.68 Overall, the assessment concludes that the proposed development can be achieved in a sustainable manner, without increasing flood risk at the site or within the greater catchment area. It would therefore be in accordance with national guidance within the Framework and the Council’s planning policies, in particular, policies CS35 and DM1.

ACCESS AND TRANSPORTATION

7.69 The accompanying Transport Assessment for the application fully appraises the existing transportation conditions and the likely impact of the proposed development, the scope of which was previously agreed with Reading Borough Council (Highways) as part of the previous application.

7.70 Following the submission of the previous application Reading Borough Council (Highways) nonetheless identified various reasons as to why it was deemed to be unacceptable, in highway terms. These are summarised below:

- The proposed development fails to demonstrate that it complies with the Local Planning Authority’s standards in respect of visibility splays and, as a result, is in conflict with Sites and Detailed Policies document Policy DM12;
- The proposed southern access is unsuitable, due to its substandard width, to accommodate the traffic which would be generated by the proposed development. This would have an adverse effect on road safety and the flow of traffic, in conflict with Core Strategy Policy CS20 and Sites and Detailed Policies document Policy DM12;
- The layout does not comply with the Local Planning Authority’s standards in respect of vehicle parking. This could result in on-street parking/reversing movements on Caversham Road, adversely affecting road safety and the flow of traffic, and in conflict with Core Strategy Policy CS24 and Sites and Detailed Policies document Policy DM12; and,
- Insufficient information has been submitted with the planning application to enable the highways, traffic and transportation implications of the proposed development to be fully assessed. From the information submitted, it is considered that the additional traffic likely to be generated by the proposal would adversely affect the safety and flow of users of the existing road network within Reading, contrary to Policies CS4, CS20 and CS22 of the Adopted Reading Core Strategy and Sites and Detailed Policies document Policy DM12.

- 7.71 The Transport Assessment submitted in support of this application confirms that the site is in a highly accessible location, with good pedestrian access and cycle paths and being in close proximity to public transport, including bus stops located within 250m and 365m of the site and Reading Rail Station located 1.1km to the south east. The station provides regular connections to London, Oxford, Bristol (Temple Meads), Cardiff and Gatwick Airport.
- 7.72 The site is also within easy reach, by foot, to Reading Town Centre providing an excellent range of facilities and services including the Oracle Shopping Centre, Broad Street Mall, Christchurch Meadow Park and King's Meadow Park.
- 7.73 Access will be maintained via Thames Side Promenade with a second vehicle/pedestrian access to replace the current southern pedestrian-only access point (which will provide access to the southern car park). A second vehicle/access point will be provided into the northern car park. This access has been amended to address the concerns regarding visibility splays (see Appendix E of the Transport Assessment).
- 7.74 The existing car park currently provides 200 spaces. Following redevelopment it would provide 118 spaces (50 spaces within the northern car park, 68 within the southern car park). 6 disabled car parking spaces located within close proximity of the hotel entrance are provided. Taxi drop off/collection will take place within the southern car park, immediately adjacent the hotel entrance.
- 7.75 It is the intention of the developer to share the use of these car parking spaces between both the proposed hotel and the Crowne Plaza hotel. Both hotel occupiers will encourage sustainable travel choices through their companies' website, over-the-phone bookings and the Travel Plan which has been prepared for staff and guests at both hotels.
- 7.76 The northern and southern car park within the development site and the car park immediately outside the Crowne Plaza hotel will be managed as a whole by the hotels management. This is outlined in greater detail within the Car Park Management Plan within the Transport Assessment.
- 7.77 In accordance with standards, the new hotel will accommodate 6 secure and sheltered cycle parking spaces, as illustrated on the accompanying layout plan ref: 0566_X_GA(XX)02_XX Rev F.
- 7.78 It is proposed that the remaining car park will be shared with the Crowne Plaza hotel. The Transport Assessment sets out how this will be apportioned between the two hotels, noting that the Council's maximum parking standard for hotels is 0.5 spaces per room (equating to a maximum provision of 127 spaces for the existing Crowne Plaza and new hotel), as follows:
- i) The Restaurant and Health Club guests (within Crowne Plaza) - 20 spaces;
 - ii) Crowne Plaza Hotel guests - 58 spaces (to include the existing 22 spaces outside the Crowne Plaza) calculated based on 48% of total bedrooms across both hotels, and
 - iii) New hotel guests- 62 spaces calculated based on 52% of total bedrooms across both hotels.
- 7.79 A car parking occupancy survey was undertaken for the Thameside Promenade Public Pay and Display Car Park and / or the Rivermead Leisure Centre Public Pay and Display Car Park in April 2019 and took place over 48 hours. The survey demonstrated that both car parks had capacity available to accommodate any potential overspill resulting from the creation of a new hotel.
- 7.80 The car parks both have reasonable charging structures that would enable guests to utilise the car parks on a 24hr basis if there are no car parking spaces available on-site. It is considered reasonable to state that hotel guests would not attempt to park on-street in the

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- vicinity of the two hotels when public car parking is available at Thameside Promenade and Rivermead Leisure Centre at reasonable prices within walking distance of the hotels.
- 7.81 Notwithstanding this, the proposals to not permit staff parking on-site and the management of parking on-site through pre-booking car parking spaces will further reduce the potential for any car parking overspill locally.
- 7.82 For this reason, it is considered that there will be no impact on on-street parking as a result of the new hotel.
- 7.83 A Car Parking Management Plan (CPMP) is submitted in support of the application confirming how car parking will be controlled and managed between the two hotel operators. This will be subject to frequent monitoring to ensure parking demand is being met in balance with the desire to encourage sustainable travel. It includes the following car park management measures:
- Guests will now be required to pre-book a parking space when booking their hotel room if alternative travel is not feasible;
 - Notification will be given to guests through the companies' website and over-the-phone at point of booking, of options for sustainable travel to the hotel, and location of public car parks;
 - Guests who have not pre-booked a car parking space, will be redirected towards a public car park in Reading upon arrival, including the Thameside Promenade Public Pay and Display Car Park and / or the Rivermead Leisure Centre Public Pay and Display Car Park;
 - Signage will be provided within the car park stating that the car park is solely for the use of guests who have reserved a car parking space;
 - The co-ordination and management of car parking allocation by each hotel management team;
 - Car parking enforcement measures will be implemented, and
 - Ongoing monitoring of the measures set out in the car parking management plan.
- 7.84 Refuse collection will take place within the site. With regards to deliveries and servicing, it has been agreed with the management of Crowne Plaza hotel to permit the shared use of the loading area within their land ownership. This reduces the requirement for additional vehicle trips on the highway network. A Delivery and Servicing Plan (DSP) is also provided. This sets out the anticipated type, number and duration of delivery / service vehicles attending the site, which is expected to comprise linen, consumables (food/drink), housekeeping supplies and refuse collection.
- 7.85 It confirms that the maximum vehicle length will be 10.0 m and no more than 4 deliveries will occur in any day. A vehicle swept path is provided to confirm this can be achieved from within the site.
- 7.86 The DSP sets out the measures that will be undertaken to keep any noise and disturbance to a minimum and ensure manoeuvring is undertaken safely. The DSP will be monitored, reviewed and modified as necessary.
- 7.87 For the purposes of the trip assessment, no trips associated with the existing car park use have been included, thereby representing a robust approach. Based on the TRICS trip rates obtained using comparable sites, it is anticipated the site will generate 36 2-way vehicle movements in the AM peak and 25 2-way vehicle movements in the PM peak (including taxis),

equating to approximately 1 additional vehicles using the local highway network every 2 minutes.

- 7.88 In regards to the impact of the proposal on the local highway network the Transport Assessment confirms that development will result in a negligible increase in total person trips undertaken during the local transport network peak hours and the vast majority of these would be undertaken by sustainable modes, based on the site's proximity to public transport facilities and the town centre. Accordingly, the proposed development is not considered to result in a significant impact on the operation of the local highway network nor impact severely on the capacity of the public transport networks.
- 7.89 In support of the application a draft Travel Plan has been submitted which outlines the measures and initiatives that will be implemented to encourage future staff and guests to travel to and from site by non-car modes of transport.
- 7.90 Overall, the Transport Assessment concludes that as a result of additional detailed surveys, it can be demonstrated that development will result in a negligible increase in total person trips undertaken during the local transport network peak hours and the vast majority would be undertaken by sustainable modes. Furthermore, travel to and from the hotel will be managed so as to encourage both guests and staff to take advantage of sustainable modes of transport, through a revised CPMP and Travel Plan. Deliveries and servicing will similarly be managed to reduce overall impact. The proposal is therefore considered to be acceptable in traffic capacity terms and there is no highway, traffic or transport reason why the development should not be permitted.

PLANNING OBLIGATIONS

- 7.91 In accordance with pre-application advice, the following addresses the potential, or otherwise, for the development to generate a requirement for a planning obligation, or financial contribution, to address any likely impact arising from the proposal with reference to three areas identified in the pre-application advice.

Affordable Housing and Employment Development

- 7.92 Pre-application advice suggests that Policy CS13 is relevant, which states that employment development should provide mitigation measures in line with its impacts on the demand for housing (including affordable housing), labour and skills and on the transport network.
- 7.93 It is clear that the policy is specifically in relation to 'employment development' and therefore relates to Class B development and that the associated formulaic approach for calculating an affordable contribution cannot be applied to a hotel proposal. It is not therefore considered that Policy CS13 and the associated Affordable Housing SPD can reasonably be applied in this case.
- 7.94 Furthermore, whilst it is acknowledged that the hotel will generate additional employment, this is expected to relate to approximately 35 new employees only and would therefore be unlikely to have any material impact on demand for housing in the borough. It should also be acknowledged that it is Redefine BDL Hotel procedure to recruit staff from the local area, with the hotel manager representing the only likely employee to be introduced from outside the region.
- 7.95 Evidently, the proposals will have no impact on the demand for housing and will generate no requirement for an affordable housing contribution.

Employment Skills and Training

- 7.96 It is acknowledged that the proposal will represent a qualifying development in relation to the Council's range of policies that seek to improve skills and access to employment within the borough.
- 7.97 The Council seeks either a site specific Employment and Skills Plan (ESP) to be progressed between the developer and the Council, or a financial contribution, to deliver a package of training and skills outcomes for local people, in relation to both the construction phase and end user phase of the development.
- 7.98 The route to be adopted by Redefine BDL Hotels will be agreed with Officers following the application's submission.

Highways

- 7.99 Pre-application advice indicates that the development is likely to attract a contribution towards upgrading the pedestrian crossing on Richfield Avenue, located adjacent to the Crowne Plaza Hotel.
- 7.100 Further, as a result of amendments to the application and the Car Parking Management Plan., it is anticipated a S106 contribution may be required to install Automatic Number Plate Recognition (ANPR) monitoring at the Thames Side Promenade Car Park to better enforce the maximum duration of stay, and if needed, a contribution to cover RBC's costs to consult on changing the parking restrictions on Caversham Road, such that only residents can park overnight if needed.
- 7.101 The level of contribution to be agreed with the Council will form part of the application negotiations.

Public Realm

- 7.102 Whilst the pre-application advice suggests that the development may be required to make a S106 contribution towards public realm improvements, no detail is provided, nor does there appear to be any planning policy basis for this.
- 7.103 The proposal is for the redevelopment of an existing car park. As part of the proposal, a substantial tree and landscaping scheme is proposed that will maintain and enhance the existing setting of the site.
- 7.104 At this stage, it is not considered that any additional planning obligation towards the public realm is necessary or required.

SUMMARY

- 7.105 From the above consideration of the relevant planning issues, it is clearly demonstrated that the proposal will offer a range of benefits (social, economic and environmental). It represents sustainable development and is considered to be in full accordance with all relevant planning policies and will fulfil the core planning principles of the Framework.
- 7.106 In these terms, the development should be approved without delay, as provided by the Framework.

CONCLUSION

- 7.107 This application seeks planning permission for a new 132 bed hotel, within the existing car park of the Crowne Plaza Hotel, Richfield Avenue, Reading, RG1 8BD.

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- 7.108 This application follows the submission of a previous application for the proposed hotel development at the site (Ref: 181056) to take account of objections raised by statutory consultees.
- 7.109 The proposals have been the subject of further pre-application consultation with Officers at Reading Borough Council.
- 7.110 This Planning Statement is part of a suite of documents that have been prepared in support of the application, which together outline and address the key considerations arising from the proposals.
- 7.111 The technical assessments, together with this Statement, set out the planning justification and demonstrate that the proposal is acceptable in terms of land use, design and townscape, environmental considerations and transportation impacts.
- 7.112 It will substantially increase the provision of hotel spaces. It will help meet the requirements of the applicant's customer base and support the demands of the business and visitor economy within the borough.
- 7.113 The proposal will optimise the use of existing land. It will represent a substantial investment within the borough and create additional jobs, both as part of the construction phase and when operational.
- 7.114 The hotel will be of a high quality design that seeks to maintain and enhance its setting on the boundary between the urban environment and the Major Landscape Feature of the Thames Valley.
- 7.115 In conclusion, the proposal is considered to be fully in accordance with the Development Plan and Government guidance contained within the Framework. For the reasons and justifications presented in this Statement, and associated reports submitted in support, there are no material considerations to suggest that planning permission should not be forthcoming.