



GERALDEVE

## Planning Statement

Hanover House, 202 Kings Road, Reading, RG1 4NN

On behalf of: Adelais Properties Limited

17 October 2018

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## 1 Introduction

- 1.1 This Planning Statement is submitted in support of an application for full planning permission, made on behalf of our client, Adelais Properties Limited (“the applicant”), for the removal of external cladding of Hanover House, 202 Kings Road, Reading, RG1 4NN (“the site”).
- 1.2 This Statement sets out the planning case in support of the application. It summaries the planning history of the site and assesses the development in the context of relevant planning policies and guidance.
- 1.3 The proposals are described in greater detail in Section 4 of this Statement. In summary, full planning permission is sought for:

### **“Removal of external cladding and associated works.”**

- 1.4 The building is currently in use as residential flats, following the conversion of the building from office use, partly under permitted development rights and partly under a planning permission. The building was originally built as offices in the 1960s and comprises ground plus part five, part seven storeys. 104 residential units are provided within the building.
- 1.5 Following the tragic fire that broke out on the 14 June 2017 at Grenfell Tower in the Royal Borough of Kensington and Chelsea, all tall residential buildings were subject to checks on their cladding. Royal Berkshire Fire and Rescue Service directed that the Building Research Establishment should test a cladding panel; it has reported that the panel does not meet the requirements for limited combustibility and following the test result, RBFRS has recommended that the cladding is removed from the building. As an interim measure to protect residents from possible risk, RBFRS has required that vehicles cannot be parked directly beneath the building until the cladding is removed in accordance with recent DCLG guidance.
- 1.6 This application proposes to remove the cladding in order to improve the fire safety of the building. Reading Borough Council planning officers have confirmed that a planning application is required to carry out these works, and therefore this application seeks the relevant permission to remove the cladding located on the

building.

1.7 This Statement should be read in conjunction with the plans and drawings submitted, as well as the following documents which are submitted in support of this application. These documents comprise:

- Existing and proposed plans prepared by Hamiltons Architects; and
- Design and Access Statement and Heritage Statement, prepared by Hamiltons Architects.

1.8 For the reasons set out in this Planning Statement, we consider that the development proposals are in accordance with applicable planning policy and guidance, and should be granted planning permission accordingly.

## 2 Site and Surroundings

- 2.1 The application site comprises Hanover House, 202 King's Road, Reading, RG1 4NN.
- 2.2 Hanover House is a part five, part seven storey (above ground) 1960s L-shaped building located on the junction of Kings Road and Eldon Road. The building faces onto Kings Road, however the ground level car park and the building itself are accessed from Eldon Road.
- 2.3 The Site of Hanover House includes a surface car park with egress to Eldon Terrace to the south.
- 2.4 Hanover House is located within the Central Reading Area Action Plan ("AAP"), which was adopted in January 2009. The action plan is part of the Local Development Framework for the Borough and provides a planning framework for the area. The land south of Hanover House, including the car park, is not within the AAP.
- 2.5 The site falls within the Eldon Square Conservation Area. The building is unlisted, but lies in close proximity to a number of buildings of architectural merit including:
  - 173-183 Kings Road (Grade II\* listed);
  - 163 King's Road (Grade II listed);
  - 185 Kings Road (Grade II listed);
  - 187-189 Kings Road (Grade II listed);
  - 196-200 Kings Road (Grade II listed);
  - 220-222 Kings Road (Grade II listed);
  - 2 Eldon Road (Grade II listed);
  - 4 and 6 Eldon Road (Grade II listed);
  - 4 and 6 Eldon Road (Grade II listed); and
  - 8 and 10 Eldon Road (Grade II listed).
- 2.6 The site is also located in close proximity to a number of unlisted buildings of merit including:
  - 169 Kings Road;

- 165-167 Kings Road; and
- 1 and 3 Eldon Road.

2.7 There are four trees in front of Hanover House with extant Tree Protection Orders.

2.8 The Site is well connected to major transport links lying approximately 700m from Reading Station, which connects to major destinations in the north, south, east and west including London Paddington, Manchester, Birmingham, Bristol and Southampton. In addition, the Elizabeth Line is expected to open from Reading Station in December 2019, which will improve accessibility to central London.

### 3 Planning History

- 3.1 Hanover House was built in the 1960s and originally provided office floorspace arranged over ground and part five/part seven upper floors.
- 3.2 On the 2 August 1985, planning permission was granted (ref: 85/TP/478) for the following works:  
  
**“Office block refurbishment including recladding of external elevations enclosed roof mounted air conditioning plant.”**
- 3.3 A condition (number 3) was attached to the decision notice (ref: 85/TP/478) and required **“details, including samples, of the external materials and finishes to be used on the walls and roofs of the buildings shall be submitted to and approved by the Local Planning Authority before any development is commenced.”** Following this, details were submitted and the aluminium composite cladding was approved on the 11 March 1986. It is this cladding that the current application seeks to remove.
- 3.4 On 25 January 2007 (ref: 061133) planning permission was granted for the change of use of the 4<sup>th</sup> floor from offices (Use Class B1(a)) to offices and/or educational use (Use Class B1 and/or D1). A condition attached to this permission limited the D1 use to educational use.
- 3.5 Prior approval was granted on 16 October 2014 for the change of use of all floors, except the fourth floor, from office use (Class B1) to residential use (Class C3) under permitted development rights to create up to 90 new residential units.
- 3.6 Following this, a change of use was granted on the 23 June 2015 for the fourth floor to residential use (Class C3), providing 14 residential units. An associated non-material amendment was granted on 4 August 2015 to change the layout and location of six units (ref. 151196).
- 3.7 The building has been converted and is now occupied as residential dwellings. The lawful use of the site is therefore residential (Class C3).

## 4 Development Proposals

- 4.1 Following the tragic fire that broke out on the 14 June 2017 at Grenfell Tower in the Royal Borough of Kensington and Chelsea, all tall residential buildings were subject to checks on their cladding. The Royal Berkshire Fire and Rescue Service reviewed Hanover House as part of this process.
- 4.2 Royal Berkshire Fire and Rescue Service directed that the Building Research Establishment should test a cladding panel; it has reported that the panel does not meet the requirements for limited combustibility and following the test result, RBFRS has recommended that the cladding is removed from the building. As an interim measure to protect residents from possible risk, RBFRS has required that vehicles cannot be parked directly beneath the building until the cladding is removed in accordance with recent DCLG guidance.
- 4.3 The proposals seek to remove the metal composite cladding which was approved in the 1980s and expose the pre-cast concrete panels underneath the existing cladding. Concrete is a non-combustible material and has a slow rate of heat transfer. Therefore, this will improve the fire safety of the residential building and reduce the risk of fire being transferred externally via the cladding material.
- 4.4 The proposed conversion works are entirely external, with no change of use proposed.
- 4.5 This application seeks to prioritise the safety of the residents within the building and to ensure that the necessary remedial action is taken.
- 4.6 Pre-application discussions were held with Reading Borough Council planning officers who stated that the proposals to remove the existing cladding would require planning permission. This application is therefore being submitted to secure the relevant permission for these works to take place.
- 4.7 A meeting was held with Reading Civic Society and Reading Conservation Area Advisory on the 10th September in order to gain their views on the proposals. The Chair of the Reading Civic Society reflected that it was interesting that the building will be taken back to its 1960s appearance and concluded that the proposed

alterations were sound.

## 5 Planning Policy

- 5.1 Reading Borough Council's Development Plan currently comprises the Core Strategy (2008), the Sites and Detailed Policies Document ('SDPD') (2012), the Proposals Map (2012), the Reading Central Area Action Plan (2009), saved policies from the Replacement Minerals Local Plan and the Waste Local Plan and one remaining policy from the now-revoked South East Plan. The Council has also produced Supplementary Planning Documents (SPDs) which provide guidance on the implementation of planning policy.
- 5.2 The Council is in the process of preparing a new Local Plan for the Borough, which, once adopted, will replace all of the current development plan documents including the Core Strategy, Reading Central Area Action Plan and SDPD. The Local Plan was submitted to the Secretary of State on Thursday 29th March 2018 for public examination.
- 5.3 The Community Infrastructure Levy ('CIL') charging schedule came into force on 1 April 2015, and is applicable to all development permitted on or after this date.

### *National Planning Policy Framework (NPPF)*

- 5.4 The revised NPPF was published in July 2018 and is a material consideration for all planning applications in the Borough. For the purposes of decision-taking in the Borough, the policies in the Core Strategy, SDPD and Reading Central AAP are not considered out-of-date simply because they were adopted before the publication of the NPPF. However, policies in the NPPF are material considerations which the Council should take into account. Since 27 March 2013, the Council should give due weight to relevant policies in the Core Strategy according to their degree of consistency with the NPPF.
- 5.5 Paragraph 7 of the NPPF emphasizes that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 11 of the NPPF requires that all plans should apply a presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.

### *Local Planning Policy*

5.6 It is considered that the relevant policies in the Core Strategy are:

- Policy CS1 (Sustainable Construction and Design)
- Policy CS7 (Design and the Public Realm)
- Policy CS33 (Protection and Enhancement of the Historic Environment)

5.7 It is considered that the relevant policies in the emerging Local Plan are:

- CC1 (Presumption in favour of Sustainable Development)
- CC2 (Sustainable Design and Construction)
- CC7 (Design and the Public Realm)
- CC8 (Safeguarding Amenity)
- EN1 (Protection and Enhancement of the Historic Environment)

5.8 Also of relevance is the Sustainable Design and Construction SPD (adopted July 2011).

### *Sustainable Development*

5.9 Policy CS1 (Sustainable Construction and Design) of the Core Strategy states that proposals for new development including the refurbishment of existing building stock will be acceptable where the design of buildings and site energy uses energy, water, materials and other natural resources efficiently.

5.10 Emerging policy CC1 (Presumption in favour of Sustainable Development) of the Draft Local Plan emphasises that a positive approach will be taken for proposals which reflect a presumption in favour of sustainable development.

### *Public Safety and Design*

5.11 As set out above, achieving sustainable development is at the heart of the NPPF. One of the three strands of sustainable development is “a social objective”, which, as set out in para 8 of the NPPF, involves “**fostering a well-designed and safe built environment**”. Section 8 of the NPPF provides further guidance on the social objectives of sustainable development. Particularly in respect of public

safety, para 95 of the NPPF states that planning policies and decisions should promote public safety.

- 5.12 Policy CS1 (Sustainable Construction and Design) of the Core Strategy states that proposals for the redevelopment and refurbishment of existing building stock will be acceptable where the design of buildings and site layouts use energy, water, minerals and other natural resources appropriately.
- 5.13 Policy CS7 (Design and the Public Realm) of the Core Strategy requires that all development is of high design quality and maintains and enhanced the character and appearance of Reading. The various components of development will be considered including architectural detail and materials.
- 5.14 Parts (d) and (e) of emerging policy CC2 (Sustainable Design and Construction) of the Draft Local Plan state that:
- d. “The architectural details and materials in the central area should be of high quality and respect the form and quality of the detailing and materials in areas local to the development site**
  - e. Development and any associated public realm should contribute to the diversity of the central area, be capable of easy adaption over time to meet changing circumstances and be designed to enhance community safety”**
- 5.15 Emerging policy CC7 (Design and the Public Realm) of the Draft Local Plan states that the development must be of high quality design that maintains and enhances the character and appearance of the area of Reading.

### *Heritage*

- 5.16 With regard to the historic environment, policy CS3 (Protection and Enhancement of the Historic Environment) of the Core Strategy explains that the Council will seek to protect and enhance the historic environment including listed buildings and conservation areas. Planning permission will only be granted where there is no harm to the historic assets and their settings.

- 5.17 Emerging policy EN1 (Protection and Enhancement of the Historic Environment) of the Draft Local Plan states that the historic environment including their settings will be protected and where possible enhanced. It requires that applications which affect or have the potential to affect the significant features of heritage assets should be justified by a Heritage Statement.

*Amenity*

- 5.18 Policy DM4 of the Sites and Detailed Policies Document seeks to protect the amenity of existing and proposed residential occupants in the Borough. Development must not cause a significant detrimental impact through privacy and overlooking, daylight/sunlight, visual dominance, noise, artificial lighting, vibration, dust/fumes/smell, crime and safety or traffic.
- 5.19 Emerging Policy CC8 (Safeguarding Amenity) of the Draft Local Plan states that development should not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, including: privacy and overlooking, access to sunlight, visual dominance and overbearing effects of a development, harm to outlook, noise and disturbance, artificial lighting, vibration, dust and fumes, smell, crime and safety, or wind.

## 6 Planning Assessment

6.1 The only works proposed under this application is the removal of the external cladding. Therefore, the only relevant planning policy considerations are considered to be:

- Public safety, design and heritage; and
- Amenity

6.2 These considerations are assessed in this section of the Statement. It is demonstrated that the proposed amendments are supported at all levels of planning policy and guidance and therefore should be approved without delay.

### *Public Safety, Design and Heritage*

6.3 The existing cladding has been confirmed by the Berkshire Fire Service as potentially proposing a fire safety risk to the residents at Hanover House. The current building is therefore not providing a safe environment for its residents, which is contrary to planning policy and the objectives of achieving the social objectives of sustainable development.

6.4 The proposals would result in the removal of the existing cladding, which is poor quality in design, both in fire safety terms and aesthetically. The concrete, which will be exposed underneath the cladding, will offer a better alternative to the existing exterior, as it is a non-combustible material and has a slow rate of heat transfer. Therefore, the proposals will improve public safety and should therefore be approved without delay in line with para 95 of the NPPF.

6.5 The proposals are in accordance with policy CS1 of the Core Strategy, as the removal of the cladding provides a sustainable design solution, which uses materials appropriately in order to safeguard both the current residents and future occupiers of the building.

6.6 The proposals are in accordance with policy CS7 of the Core Strategy, which seeks to ensure that materials are of high quality design and maintains and enhanced the character and appearance of Reading. Likewise, the proposals are in accordance with Parts (d) and (e) of emerging policy CC2 (Sustainable Design

and Construction) of the Draft Local Plan, which requires that development should be capable of easy adaption over time to meet changing circumstances and be designed to enhance community safety.

- 6.7 It is also considered that the proposals in accordance with policy CS3 of the Core Strategy, as the original pre-cast concrete is sensitive to the character and appearance of the existing building, the surrounding listed buildings, unlisted buildings of merit and the Eldon Square Conservation Area. The building will be returning to its original form, which is considered to be an improvement in visual terms.

#### *Amenity*

- 6.8 The development will not cause a significant detrimental impact through privacy and overlooking, daylight/sunlight, visual dominance, noise, artificial lighting, vibration, dust/fumes/smell, crime and safety or traffic. Therefore the proposals are in accordance with policy DM4 of the Sites and Detailed Policies Document.

## 7 Conclusion

- 6.9 Royal Berkshire Fire and Rescue Service directed that the Building Research Establishment should test a cladding panel; it has reported that the panel does not meet the requirements for limited combustibility and following the test result, RBFRS has recommended that the cladding is removed from the building. As an interim measure to protect residents from possible risk, RBFRS has required that vehicles cannot be parked directly beneath the building until the cladding is removed in accordance with recent DCLG guidance.
- 6.10 The proposed works are necessary to ensure that the building is safe and fit for purpose for the current and future occupiers of the building. The works should be approved by the Council without delay to ensure public safety for the residents at Hanover House.
- 6.11 It is considered that the proposals are sensitive to the character and appearance of the existing building, the surrounding listed buildings, unlisted buildings of merit and the Eldon Square Conservation Area.
- 6.12 It is therefore considered that the scheme is in accordance with relevant planning policy and planning permission should be granted without delay, in accordance with the NPPF which encourages the creation of safe environments for local communities.