

Mike Gilbert Planning

**Change of use of former hotel to create 8 apartments,
The Roebuck, Oxford Road, Tilehurst,
Reading, RG31 6TG**

Planning Statement



May 2025

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Instruction

Roetel Ltd requested that we prepare a Planning Statement to accompany planning and listed building consent applications to change the use of a former hotel, The Roebuck, Oxford Road, Tilehurst, Reading, to create 8 apartments. This Statement has been prepared by Mike Gilbert who is a professional member of the Royal Town Planning Institute with over 30 years of experience working in Berkshire, Oxfordshire, Buckinghamshire and Gloucestershire.

Introduction

1. The Roebuck is a former hotel which lies at the western end of Oxford Road, Tilehurst. The building fronts onto Oxford Road and has accommodation on three floors. The London to Bristol main railway line and River Thames lie at a much lower level to the rear. There are 16 car parking spaces on both sides and immediately in front of the building. The whole building has been used as a large HMO (house in multiple occupation) with 21 letting rooms for over 10 years – an HMO licence was granted by the Council in May 2017 and renewed in September 2022.
2. The smaller “west wing” of The Roebuck dates from the 17th century and is Grade II listed. It originally had a thatched roof and was used as a public house. The attached much larger red brick building was added in the late 19th century when the whole building became a hotel with a restaurant and bar catering for boaters and anglers using the River Thames. Given the historical and physical connections between the two parts

of The Roebuck, it is clear that the whole building is covered by the listed building designation.

3. The applicants acquired The Roebuck in July 2011. At that time, neither the hotel or the restaurant and bar were in use. Six residents lived in the building on Assured Shorthold Tenancies, and the rest of the building was vacant and in a deteriorating condition. The building was subsequently closed for a while to enable repair works to be carried out, and it re-opened in 2013 as a large HMO with residents' rooms and a communal kitchen and lounge on the ground floor and further residents' rooms with shared kitchen facilities on the two upper floors.
4. Two planning applications were submitted in September 2011 to use the whole building as 24 HMO flats (application nos. PL/11/0817 and PL/11/0818). However, neither application was determined and both of the case files were closed in July 2012.
5. A development of 6 x two bedroom townhouses was permitted in March 2012 on part of the former car park of The Roebuck, on the south-east side of the building (application no. 11/01959/FUL). Those houses have been built.
6. In addition to this Planning Statement, a full set of drawings, a Heritage Impact Assessment prepared by HCUK Group, a Noise Report prepared by WBM Acoustic Consultants, and an Affordable Housing Viability Assessment prepared by BNP Paribas Real Estate have been submitted with these applications. As the planning application is simply for the change of use of the building with no external works and no internal works affecting the roof space, an ecological appraisal is not considered necessary.

The proposal

7. The proposal is to cease the existing use of The Roebuck as a 21 room HMO and use the building as eight apartments – two with one bedroom, five with two bedrooms, and one with three bedrooms. All of the proposed apartments meet the spatial requirements of the Technical Housing Standards – Nationally Described Space Standard. The gross internal floor area of the building is 850 sq metres. The site area is 0.14 hectare.
8. Apartment 1 occupies the ground floor of the Grade II listed west wing, and apartments 2 and 3 occupy the remainder of the ground floor. Apartment 4 occupies the two upper floors of the west wing, and apartments 5, 6, 7 and 8 occupy the remainder of the first and second floors (two on each floor).
9. No external alterations are proposed to the building and only minimal internal alterations are required to enable the building's conversion to create the eight proposed apartments.
10. Externally, the existing car parking areas will be retained so there will be two parking spaces for each apartment. In addition, a secure store for 16 bicycles (also two per apartment) will be provided on the north-west side of the building, and the existing bin storage area on the south-east side of the building will be retained.
11. For the reasons set out in the Affordable Housing Viability Assessment, the proposal does not include the provision of any affordable housing.
12. The Roebuck and the adjacent row of six townhouses were placed on the market in 2024. The agent was Allsop Auctions and it went to auction on 20th June 2024 with a combined guide price of £2.85m. However, there were no bidders so they did not sell.

Policies and guidance

National Planning Policy Framework

13. Paragraph 11 sets out the presumption in favour of sustainable development, with sub-paragraph c) saying that proposals which accord with an up-to-date development plan should be approved without delay.
14. Under the heading *Delivering a sufficient supply of homes*, paragraph 73 says that in order to promote a good mix of sites local planning authorities should support the development of windfall sites by giving "*great weight*" to the benefits of using suitable sites within existing settlements for new homes. Paragraph 65 says that affordable housing should not be sought on schemes that are not "*major developments*", other than in designated rural areas.
15. Under the heading *Making effective use of land*, paragraph 125 says that planning policies and decisions should support and promote the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing.
16. Under the heading *Conserving and enhancing the historic environment*, paragraphs 212 and 213 say that when considering the impact of new development on the significance of designated heritage assets, "*great weight*" should be given to their conservation and any harm to their significance requires clear and convincing justification. Paragraph 215 says that when development proposals would lead to less than substantial harm to the significance of a designated heritage asset, that harm should be weighed against the public benefits of the proposal including securing its optimum viable use.

Reading Borough Local Plan (adopted November 2019)

17. Policy EN1 relates to the protection and enhancement of the historic environment and says that all proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings and the historic character and local distinctiveness of the area in which they are located.

- The Heritage Impact Assessment addresses this issue.

18. Policy H8 relates to residential conversions and says that such schemes will be assessed against their impact on the amenity and character of the surrounding area, any loss of privacy or external amenity space, the provision and location of adequate on-site car parking, and the treatment of bin storage areas and other related servicing. In addition, the property to be converted must measure more than 120 sq metres gross floorspace and at least 25% of the new units should be suitable for family occupation with a minimum of two bedrooms.

- The proposal complies with these policy requirements.

19. Policy H3 relates to affordable housing and, despite paragraph 65 of the National Planning Policy Framework, requires a contribution towards affordable housing provision from all new residential developments. The policy says that on developments of 5 to 9 dwellings, a financial contribution needs to be made to enable the equivalent of 20% of the new housing to be provided as affordable housing elsewhere in the Borough. Where proposals fall short of this policy target due to viability considerations, an open-book approach will be taken and the onus will be on the developer / landowner to demonstrate the circumstances justifying a lower affordable housing contribution. Proposals for the conversion of a dwelling to self-contained flats where no new floorspace is proposed are exempt from the need to provide affordable housing.

- The Affordable Housing Viability Assessment (AHVA) has been prepared in accordance with the Council's Affordable Housing SPD and demonstrates that the proposal cannot afford any affordable housing provision. The proposal is simply for the conversion of the existing building and no new floorspace is proposed. The AHVA also shows the applicant's willingness to take an "*open-book approach*" in accordance with Policy H3.

20. Policy CC8 relates to safeguarding amenity and says that new development must not harm the living environment of existing dwellings or result in unacceptable living conditions for new dwellings in terms of, amongst other things, privacy and overlooking, access to sunlight and daylight, harm to outlook, noise, disturbance or vibration.

- The Noise Report addresses the issue of potential noise disturbance from the main road at the front of the site and the railway line at the rear.

21. Policy EN15 relates to air quality and is relevant as the application site and much of Reading and the main radial roads lie within a single Air Quality Management Area. The policy aims to ensure that new development does not lead to a net increase in vehicle emissions, and any increased exposure within the poorest areas of air quality is accompanied by appropriate mitigation.

- The proposal will not lead to a net increase in vehicle emissions given the existing use of the building is a large HMO with 21 letting rooms. An Air Quality Assessment is not required in this case as the application is not for "*major development*".

Residential Conversions SPD (adopted March 2023)

22. The SPD provides a checklist of 27 issues to consider when assessing a planning application for residential conversions. Some of the issues relate to HMO conversions

or external alterations to buildings. The 16 issues relevant to this case are listed below together with a comment on how each one has been addressed:

- Checklist 3: Any residential conversion must contribute to achieving an appropriately mixed and sustainable community by providing an acceptable housing mix, ensuring that single family housing remains the dominant form of dwelling in the vicinity of the application site and there will not be a detrimental impact on the physical character of the area.

Comment: The proposal does not result in the loss of any family housing and provides a good mix of 1, 2 and 3 bedroom apartments.

- Checklist 5: An appropriate level of private outdoor space needs to be expected.

Comment: Whilst the terrace and large veranda at the rear of The Roebuck provide some outdoor space, there is no scope to provide any additional outdoor space on the site. Nevertheless, the amenities of the River Thames and the Thames Path lie close by at the rear of the site.

- Checklist 6: The issues below need to be taken into account in any residential conversion application:

- Privacy and overlooking
- Access to sunlight and daylight
- Visual dominance and overbearing effects of a development
- Noise and disturbance
- Crime and safety

Comment: All of these issues have been taken into account and the Noise Report addresses the issue of noise and disturbance.

- Checklist 7: The property to be converted to flats should have four or more bedrooms or measure more than 120 sq metres gross floorspace.

Comment: The proposal complies with this requirement.

- Checklist 8: Internal floorspace and headroom should be provided in all forms of residential conversions to allow for a high quality of life. The nationally described space standards provide a good basis for assessment.

Comment: The proposal complies with this requirement.

- Checklist 9: Appropriate sound insulation needs to be provided between proposed and neighbouring units before a converted property is occupied.

Comment: The Roebuck is a detached building so there are no neighbouring units.

Internally, appropriate sound insulation will be provided where needed within the walls and floors sub-dividing the apartments.

- Checklist 10: Acceptable layouts need to avoid locating living rooms, bathrooms and kitchens next to, above or below proposed and neighbouring bedrooms.

Instead, the “stacking” of rooms of a similar type is preferable.

Comment: This has been achieved as far as possible and will be supplemented by appropriate sound insulation within the walls and floors sub-dividing the apartments.

- Checklist 11: Habitable rooms, such as living rooms and bedrooms, need to include an external window.

Comment: The proposal complies with this requirement.

- Checklist 14: Parking standards for all residential conversions should be in accordance with the Council’s adopted Parking Standards and Design SPD.

Comment: The proposal complies with this requirement.

- Checklist 16: Boundary treatment which contributes to the character of the area should not be removed to accommodate parking or access to parking.

Comment: No boundary treatment will be removed.

- Checklist 17: The provision of outdoor cycle storage should have a secure, covered and convenient location. The storage area should be lockable with provision to secure bicycles within it.

Comment: Secure cycle storage is proposed for 16 bicycles (two per apartment).

- Checklist 18: Sufficient and suitable refuse containers should be provided within the curtilage of the application building which are easily accessible for all occupants and the refuse collectors and they should be sympathetically located with regard to their visual impact.

Comment: The proposal includes the retention of the existing ample bin storage area on the south-east side of the building, which is set well back from the road but in an accessible location.

- Checklist 19: Where possible, a level pedestrian access from the public highway to the principal entrance should be provided or retained.

Comment: The proposal complies with this requirement in relation to the three pedestrian accesses into the building.

- Checklist 20: Proposals that would alter a listed building in a way that affects its character or appearance as a building of special architectural or historic interest will require listed building consent and will need to protect and where possible enhance the significance of the listed building.

Comment: The Heritage Impact Assessment addresses this issue.

- Checklist 23: Early discussions with a Building Control Officer will improve the internal layout of the scheme and may avoid the need for external fire escapes.

Comment: The building is already used as a large HMO and includes an external fire escape on the rear elevation.

- Checklist 25: At least one unit of accommodation created should be suitable for family occupation with a minimum of two bedrooms.

Comment: The proposal complies with this requirement.

Planning assessment

Principle of the proposal

23. The application site lies on one of the main radial roads into Reading, so the principle of providing additional dwellings in such a sustainable location is to be welcomed. In addition, the proposal makes effective use of an existing building and heritage asset so will not result in the loss of any open space and will secure the long-term future of the listed building. It should be noted that the use of the west wing as a public house ceased a long time ago when it was absorbed into the hotel use of the whole building with a restaurant and bar on the ground floor.
24. Local Plan paragraph 4.4.57 says that residential conversions have an important role to play in providing a sufficient housing supply in Reading and adding a valuable supply of reasonably low-cost private rented accommodation, thereby meeting an identified need in the market. Such conversions generally provide for a need for small and flexibly let accommodation which reflects current household formation trends and the transient nature of parts of the labour market. The proposed residential conversion of The Roebuck contributes towards meeting this market need, either as reasonably low-cost private rented accommodation or as small, lower-cost market housing.
25. The Affordable Housing Viability Assessment prepared by BNP Paribas Real Estate confirms that the proposed scheme generates a negative residual land value of about £0.29m and when benchmarked against the site's value of about £1.99m the scheme generates a deficit of about £2.28m. Accordingly, the scheme cannot support any affordable housing provision. In these circumstances, the applicant's willingness to risk investing in the development in the expectation that market conditions will improve in the

future needs to be encouraged.

Heritage impact

26. The Heritage Impact Assessment prepared by HCUK Group assesses the significance of The Roebuck as a heritage asset and the impact of the proposed development on that significance. The report concludes that the proposed change of use will result in some degree of harm to the significance of the heritage asset due the loss of the building's historic (original) use as a public house. However, it is acknowledged that the building as a whole has been used as an HMO for many years and that a residential use is consistent with the conservation of the Grade II listed building as it can be introduced without significant alterations and will secure the building's long-term conservation and maintenance. The proposed physical alterations have been kept to a minimum to avoid harming the historic fabric of the listed building. The report says that these works "*are sensitive to the significance of the listed building and would not cause harm*". As such, the Heritage Impact Assessment identifies "*a wholly limited and low level of less than substantial harm*" to the significance of the heritage asset due solely to the cessation of the building's historic use as a public house.

27. In accordance with paragraph 215 of the NPPF and policy EN1 of the Reading Borough Local Plan, a balanced judgement needs to be made having regard to any harm the proposal would have on the significance of The Roebuck as a designated heritage asset and the public benefits arising from the proposal, including securing the building's optimum viable use.

28. The historic use of The Roebuck as a public house ceased many years ago, likely due to lack of viability. The unsuccessful marketing of The Roebuck as a hotel with restaurant and bar in 2024 is also an important consideration in this respect. The

optimum viable use of The Roebuck is considered to be residential. A significant heritage benefit of the proposal, therefore, to weigh against the identified “*wholly limited and low level of less than substantial harm*” is bringing the building into a viable, long-term residential use. Substantial weight needs to be given this heritage benefit. In addition, substantial weight needs to be given to the proposal’s contribution of eight high quality apartments to Reading’s housing supply, particularly given the Local Plan’s confirmation that residential conversions make a valuable contribution of reasonably low-cost dwellings to the overall housing supply and so help to meet an identified market need.

29. Taken together, these are considered to be substantial public benefits arising from the proposed development which clearly outweigh the limited and low level harm identified to the heritage asset due to the cessation of its historic (and long-lost) public house use.

Noise

30. The Noise Report prepared by WBM Acoustic Consultants confirms that road traffic noise at the front of The Roebuck and noise from trains on the railway line at the rear are issues which need to be addressed. The Report recommends the installation of noise mitigation measures in the form of secondary double glazing to habitable rooms and increased roof insulation. It needs to be remembered, of course, that The Roebuck has been used for many years in the past as a hotel and is currently used as an HMO, both of which are similarly noise-sensitive uses as the proposed apartments. The Council, therefore, will need to consider whether it is reasonable and necessary, given the building’s historic uses, to impose conditions on the planning permission to address the issues raised in the Noise Report.

Conclusion

31. The principle of the proposal complies with Policies H3 and H8. In addition, the scheme has been sensitively designed to ensure compliance with Policies EN1 and CC8 and the relevant issues in the Residential Conversions SPD. Whilst the scheme has been shown to be non-viable, the applicants nonetheless are willing to risk the investment in the expectation that market conditions will improve in the future and also to secure the long-term future of the listed building. In terms of heritage impact, the limited and low level of less than substantial harm which has been identified to the heritage asset is clearly outweighed by the substantial public benefits of the proposal in terms of bringing The Roebuck into a viable, long-term residential use and adding eight reasonably low-cost and high quality apartments to Reading's housing supply.
32. In accordance with paragraph 11c) of the NPPF, therefore, planning permission and listed building consent should be granted.
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9th May 2025