



TOWN & COUNTRY PLANNING CONSULTANTS

Planning Department
Reading Borough Council
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RG1 2LU

BS/JLA_472

BY E-MAIL

6 June 2025

Dear Sir or Madam,

RE: 60 BATH ROAD, READING, RG30 2AY
FULL PLANNING APPLICATION: CHANGE OF USE FROM HOTEL TO DAY
NURSERY
COVERING LETTER: SUPPORTING PLANNING ASSESSMENT

This letter is submitted to the London Borough of Richmond upon Thames ("Council"), on behalf of Gavil Group ("Applicant"), in relation to Full Planning Application ("Application") for the: "change of use from a hotel to day nursery with associated works" ("Proposal") at 60 Bath Road, Reading, RG30 2AY ("Site").

This letter should be read in conjunction with the following documents:

- Completed Application Forms and CIL Forms prepared by JLA
- Existing and Proposed Drawings prepared by Gavil Group
- Transport Note prepared by Evoke Transport

The purpose of this document is to draw out the key planning issues arising from the development proposal and to assess the proposal in light of the national and local planning policy. This document will demonstrate that the Proposal accords with these policies.

The contents of this letter are as follows:

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1. BACKGROUND & OBJECTIVES

The Applicant has an option on the Site and seeks to make efficient use of an underutilised hotel and change of use to create much needed nursery spaces in the area. It is noted in Reading's Childcare Sufficiency Assessment 2022-23, that the Council needs new nurseries to facilitate the demand in the borough, noting the national shortage and parents often signing up to waiting lists well before their children are even born, to avoid disappointment.

The proposed development is intended to achieve the important planning aims of regeneration and sustainable development, arising out of the Site's particular characteristics and Applicant's unique circumstance, together with the existing planning policy context.

The key objectives of the proposals are:

- The preservation of the character of the area
- Preservation of neighbour amenity
- Preservation of local highway conditions

2. SITE DETAILS

i. Site Description

The Site relates to a two-storey detached building, set over three floors with a large single storey extension to the rear, which accommodates the Beech House Hotel, sited to the north side of Bath Road. The hotel has 15 rooms with ancillary accommodation, lounges and dining hall, laundry and plant room.

The Site benefits from off street parking which can accommodate 20 vehicles with dual access onto Bath Road clearly marked as entrance and exit. A garden to the rear is evident and this is lined with mature vegetation.

To the east of the Site, a single track leads to a dwelling to the north of the Site (58 Bath Road) and accessed via the same vehicle access to the hotel.

The Site has no designations

ii. Context

The Site is bordered by a bungalow to the north of the Site (occupied by the owner of the hotel), and flatted development to the east and west.

The Site is located in a predominately residential area, however, there are a mix of uses to the south side of Bath Road, notably a restaurant, flatted development, NHS facility and secondary school.

To the west of the Site and in relatively close proximity, lies the Lawn and Parkside International Hotels.

The Site does not lie within a district or local centre and is sited 1.3km to the western boundary of Reading Town Centre.

Heritage Assets

The Site is not listed and does not lie within a conservation area.

Google Street View: Existing Front Elevation



Google Maps: Aerial Photograph of the Site & Surrounding Area



Transport & Accessibility

The Site benefits from vehicular access and off street parking.

There are parking restrictions along this section of Bath Road. And Bath Road forms part of the cycle network route 422.

Flood Risk

The Site is located within Flood Zone 1, and not affected by surface water flooding

iii. Planning History

A planning history search for the Site has been undertaken by making use of the online property search engine on the Council's website. Of relevance:

PL/01/1367

Change of use from nursing home (C2 use) to 15-bedroom hotel (C1 use) incorporating manager's flat/office

Approved 20 June 2001

PL/09/0029

Change of use from hotel to non-secure convalescent centre.

Refused 2 February 2009

PL/89/0637

Single storey front and rear extensions and minor alterations to existing retirement home

Approved 1989

3. PROPOSED DEVELOPMENT

Please refer to the drawings prepared by Gavil Group.

The Proposal comprises the change of use of the hotel to a day nursery. The nursery would comprise 6 class rooms alongside offices, training room, plant and store rooms.

Provision for refuse and cycle/scooter storage is proposed.

4. PLANNING POLICY POSITION

i. National Planning Policy Framework ("NPPF") (2024)

The key chapters applying to the site are (but not limited to):

- 4. Decision-making
- 8. Promoting healthy and safe communities
- 9 Promoting Sustainable Transport
- 11. Making effective use of land

ii. Reading

The Council's Development Plan, given its statutory status, is the starting point when considering planning applications. Section 70 (2) of the Town and Country Planning Act 1990, states that the local planning authority shall have regard to the provisions of the Development Plan, so far as material to the application, and to any other material considerations. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that where regard is to be had to the Development Plan in the Planning Acts and confirms that applications for planning permission must be determined in accordance with the Plan unless material considerations indicate otherwise.

The Development Plan relevant to this application comprises the Reading Borough Local Plan ('RBLP'), adopted in November 2019.

Reading Borough Local Plan, November 2019

The Local Plan was adopted in November 2019 and sets the policies for development in Reading up to 2036. It pre-dates the most recent revision of the National Planning Policy Framework ('NPPF'), updated in 2024. Whilst not replacing the Development Plan as the starting point for decision-taking, this provides the most up-to-date planning policy guidance, therefore an important material consideration.

The relevant policies include (but are not limited to):

- CC1 - Presumption in favour of sustainable development
- CC5 - Waste Minimisation and Storage
- CC6 - Accessibility and the Intensity of Development
- CC7 - Design and the Public Realm
- CC8 - Safeguarding Amenity
- CC9 - Securing Infrastructure
- EN12 - Biodiversity and the Green Network
- EN14 - Trees, Hedges and Woodland
- EN15 - Air Quality
- EN18 - Flooding and Sustainable Drainage Systems
- OU1 - New and Existing Community Facilities
- TR1 - Achieving the Transport Strategy
- TR3 - Access, Traffic and Highway-Related Matters
- TR4 - Cycle Routes and Facilities
- TR5 - Car and Cycle Parking and Electric Vehicle Charging

iii. Supplementary Planning Guidance/Documents:

- Revised Parking Standards and Design SPD (2011)

The main material planning considerations to be considered as part of this assessment are as follows:

- Principle of Development
- Neighbour Amenity
- Transport & Parking
- Biodiversity
- Other Material Considerations

i. Principle of Development

[Policy Position]

Paragraph 100 of the NPPF states that 'It is important that a sufficient choice of early years, school are available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: a) give great weight to the need to create, expand or alter early years facilities through the preparation of plans and decisions on applications; and b) work with early years, promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

Policy OU1 of the Local Plan suggests that proposals for new, extended or improved community facilities will be acceptable and should be located where there is a choice of means of travel (including walking and cycling), and in existing centres where possible.

Policy CC6 of the Local Plan 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, with the densest and largest scale development taking place in the most accessible locations.

[Policy Justification]

Hotels are defined as 'Centre Uses' in the Local Plan and Policy RL3 (Vitality and Viability of Smaller Centres) states that within district, major local and local centres, development will not be permitted where there is net loss of 'centre uses' for 'non-centre uses' at the ground floor. In this instance, the site is outside the town centre and other district centres. There is no other specific policy which would protect the loss of the hotel and, therefore, there should be no in-principle conflict with the Local Plan regarding the loss of the hotel.

While the hotel use has not ceased, it is understood that it has failed to run at an optimal capacity and thus no longer viable. Given its out of centre location, it fails to compete with town centre hotels better suited to visitors with access to transport links and amenities.

As set out above, a larger hotel to the west of the Site exists and provides function space and other facilities, something the subject hotel cannot offer.

In accordance with Local Plan Policy OU1, the provision of early years education should be welcomed. There is a need for additional childcare in Reading as shown in the Reading Childcare Sufficiency Assessment 2022-2023 as the site is located within one of the most populated areas in Reading. It is understood that such provision and increase in the supply of childcare in Reading is a key priority for the local authority to ensure that the market can respond to the growth in demand. The Childcare Sufficiency Assessment notes that in the ward of Minster, there is only one day nursery and is states that '*Particular focus needs to be given to Minster, Norcot and Whitley wards which all have high numbers of two-year-olds but few sessional childcare providers*'.

The Site is also situated within a predominately residential area, whereby its location and accessibility (noting the bus routes along Bath Road) are considered to accord with Policy CC6 (Accessibility and the Intensity of Development).

The need set out in the Childcare Sufficiency Assessment is evident from the Applicant's analysis of other nursery space in the locality and of particular note, Little Dragons Nursery at 57-59 Bath Road has an extensive waiting list of 12-18 months and at the Berkley Gardens Day Nursery (72 Berkley Avenue), the pre school room is full and there is limited space for babies and toddlers with a lengthy waiting list. Further away, Pine Rivers Kindergarten (5 Western Elms Avenue) have very limited availability with a lengthy waiting list and Little Tots Nursery (59 Prince of Wales Avenue) has a waiting list in place until September 2025.

As a national level, the BBC reports in its article (Britain's nursery problem: Parents still face 'childcare deserts') published 21 April 2025, that *'over the last five years, access to childcare in England has declined. At the same time demand is increasing. The government estimates that by September, an additional 70,000 extra places and 35,000 staff will be needed to cope with the influx of families wanting spaces and more hours.'*

Given the above, and the support for community uses in policy OU1, the Proposal would accord with the objectives of the Local Plan.

ii. Transport and Parking

[Policy Position]

Policies TR3 (Access, Traffic and Highway related matters), TR1 (Achieving the Transport Strategy) and TR5 (Car and Cycle Parking and Electric Vehicle Charging) seek to address access, traffic, highway and parking relates matters relating to development

Local Policy TR4 requires developments to improve access too and integration of cycling facilities, including through provision of new facilities. Local Policy TR5 requires new development to provide car parking and cycle parking that is appropriate to the accessibility of sites location within the Borough, and to provide 10% of car parking spaces with electric vehicle charging points.

In accordance with Councils current adopted standards and based on staffing and pupil numbers stated above, cycle parking should be provided at a rate of 1 per 2 FTE staff.

[Policy Justification]

Please refer to the Transport Note prepared by Evoke

The Notes sets out that the level of accessibility to frequent bus and rail services to a range of destinations ensures that travel to and from the site by public transport is a realistic and viable mode of transport to and from the site.

The Note adds that the Site is in an accessible urban location on a key commuter corridor and high frequency bus route into central Reading with a range of sustainable modes of transport on offer which could cater for future end-users and visitor journeys to and from the site.

An assessment of the highway safety within the vicinity of the site indicates that there are no existing safety issues within the immediate vicinity of the site which may be exacerbated as a result on any future development.

In respect of parking, while the nursery would encourage staff and parents to utilise sustainable modes of transport, it is recognised that some parents may be dropping off and picking up children as part of their primary journey, i.e. into their workspace and home.

In accordance with the Council's car parking standards, the Site will provide 9 permanent car parking spaces for staff alongside 11 flexible pick-up / drop-off bays as part of the loop arrangement of the site.

Provision for 14 cycle spaces would be made and provided in a secure and covered location along with buggy storage space

The existing hotel already generates transport movements associated with different types of delivery and servicing trips. It is anticipated that the existing servicing arrangements will be retained as part of the application, with servicing vehicles proceeding through the loop arrangement in the same manner as cars would. This would include refuse pick up and deliveries of meals etc.

i. Neighbour Amenity

[Policy Position]

Policy CC8 states that development will not cause a detrimental impact on the living environment of existing residential properties in terms of noise and disturbance.

[Policy Justification]

A degree of comings and goings is currently experienced with the hotel and this is not necessarily limited to daytime hours.

While the frequency of pick up and drop off is likely to be different compared to the ad hoc comings and goings associated with the hotel, it is not considered that this would be significantly harmful, particular; in the context of the volume of traffic along Bath Road and the nearby roundabout and bus stops.

In the main, children would be likely to spend the bulk of the day inside and thus it is not considered that this would result in an inherently noisy relationship with neighbouring properties. While outside play space would be available, given the limited size, this use of this area is likely to be staggered for various age groups through the day.

The surrounding flatted developments are suitably distanced from the Site, with the existing rear extension of the Site along the western boundary and mature boundary vegetation likely to adequately shield residents of Armadale Court from unreasonable noise and disturbance, particularly in the context of noise from vehicle movement along the A40.

The flatted development of Huntley lies to the north east and beyond the rear boundary of the Site. Given the mature boundary vegetation along the east boundary, separation afforded by the vehicle access to No. 58 Bath Road, and ambient noise level from traffic along the A40, it is not considered that the use would be unduly intrusive to residents of Huntley

It is noted that the existing refuse area is located adjacent to the side elevation of the flats at Armadale and this accommodates a typical palisade bin. The proposed refuse strategy would include a dedicated refuse enclosure thus restricting odour and vermin and any unsightliness from the side windows. This is considered to be an improvement for the residents of the adjacent flats.

While a degree of noise is inevitable, as it has been during the operation of the hotel, this has to be considered in the context of the ambient noise level of the area. There are several contributors to noise nearby, namely the traffic to the south along the A40. On the basis of the above, the development would not give rise to an un-neighbourly relationship and would be compliant with the objectives set out in policy CC8.

ii. Biodiversity

Biodiversity net gain became mandatory for minor developments on applications made from 2nd April 2024. This application is exempt from mandatory biodiversity net gain on the grounds that the development impacts habitat of an area below a 'de minimis' threshold of 25m² or 5m of linear habitat such as hedgerows, and does not impact an onsite priority habitat.

iii. Other Material Considerations

Aside from the provision of refuse and cycle storage, no external alterations or extensions are proposed and as such, the Proposal would not have a detrimental impact on the character and appearance of the building or street scene.

The Site lies in an Air Quality Management Area given the volume of traffic along the A40. The children of the nursery would be predominantly accommodated within the building and mechanical ventilation is proposed to ensure windows could remain closed. While some exposure may be evident in the rear garden of the Site, this is located approximately 45m from Bath Road. It is envisaged that children are likely to be present in the garden outside of peak traffic flow along Bath Road, i.e. after 10am and before 5pm and this is considered sufficient to mitigate exposure to vehicle fumes.

In terms of odours and flue extraction, no on site cooking is proposed and thus no odour suppression is required.

iii. CONCLUSION

The Site is occupied by a small hotel in a suburban area that is no longer viable given its location and competition with town centre hotels and those in the locality that offer a range of facilities and services. Moreover, there are no policies that resist the loss of hotels outside of town center locations.

The Application thus seeks approval from the Council for the use of the hotel as a day nursery, along with the provision for buggy, cycle and refuse storage.

Given the evidence within Reading's Childcare Sufficiency Assessment 2022-23, the growing population for housing growth in Reading and the Applicant's analysis of nursery capacity in the locality, demonstrates that there is a need for a nursery in the area.

The Proposal would not unduly affect the character and appearance of the buildings or the visual amenities of the street scene. Having regard to the relationship with the adjacent properties, the Proposal would not harm the amenities enjoyed by occupants of adjacent properties insofar as noise and disturbance.

A Transport Note is submitted demonstrating that the Proposal would not result in an undue impact on local highway conditions and the safety of children. While sustainable modes of transport will be promoted and encouraged, off street parking for staff and parents would be provided to meet the maximum parking requirements as set out in the Local Plan.

Accordingly, the development would comply with the objectives set out in the Local Plan and on the basis of the above, we strongly commend the Proposal to the Council.

I trust this letter is satisfactory for the registration and validation of the Application and I look forward to receiving an acknowledgement of this letter shortly. However, please let me know should you require any additional information or have any queries.

Yours faithfully,

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