

NOVEMBER 17, 2025



PLANNING, DESIGN AND ACCESS STATEMENT

164-166 CAVERSHAM ROAD, READING

1. Introduction

1.1. This Planning, Design and Access Statement is prepared on behalf of RAM Bennett Ltd ('the Applicant') to accompany a full planning application to Reading Borough Council ('the Council') for the change of use of the property from hotel to 14-bedroom HMO ('the Proposed Development') at 164-166 Caversham Road ('the Site').

1.2. The description of development is as follows:

Change of use of the property (Use Class C1) to create 1 no. 14-bedroom House in Multiple Occupation (Use Class Sui Generis) and associated works

1.3. The purpose of this application is to offer high quality, affordable shared accommodation to working professional people who want to live and work within Reading, but are unable to afford to buy a place of their own at present, such as key workers, graduates, local workers and those on secondment with their employment (NB – Not students).

Statement Purpose

1.4. This Planning Statement describes the Proposed Development and how it relates to the adopted Development Plan and other material considerations including the National Planning Policy Framework ('NPPF'). The Statement should be read in conjunction with the submitted supporting documents and application drawings, detailed below and in the provided cover letter.

- Plans and drawings:
 - Location Plan
 - Existing Ground Floor Plan
 - Existing Upper Floor Plan
 - Proposed Ground Floor Plan
 - Proposed Upper Floor Plan
 - Proposed Site Layout Plan
- Flood Risk Assessment (Oct 2025)

Statement Structure

1.5. This Statement is structured as follows:

- The background to the Proposed Development and the description of the Site and its surroundings are set out in Sections 2 and 3 respectively.
- A summary of relevant planning history for the Site is provided in Section 4.
- At Section 5, the Statement provides a summary of the relevant planning policy framework
- Section 6 of this Statement provides a summary and conclusions

2. Background to the Development

2.1. RAM Bennett Limited was established in 2016, providing high quality shared accommodation for professionals. The Applicant has worked proactively with the Council to ensure their properties exceed the standards required by HMO Licensing and have planning permission where required (see photos in Appendix to demonstrate the high quality nature of the properties, more of which can be found here).

2.2. There is a well-established need for the Proposed Development. House price affordability is a significant issue in Reading and surrounding areas, and shared accommodation provides professionals in the area with an affordable option to enable them to live and work in the town. Of the Applicant's existing properties, there was an occupancy rate of 99.2% in 2024 with an average stay of 12 + months, demonstrating the demand for this type of HMO property which provides a ready-made community for people to settle in the area.

- 2.3. The Site was last used as a hotel offering serviced accommodation. The property was acquired by 3 Bridge Commercial Ltd, a sister company of RAM Bennett, when it required full refurbishment and redecoration. Following this, the property has been operated as a hotel / serviced apartments with an average room occupancy of 91.1%.

3. The Site

- 3.1. 164-166 Caversham Road is a three-storey terraced property located in central Reading. It is situated in a mixed use area, characterised by a mix of dwelling types, including terraced houses, commercial properties and flats.
- 3.2. The site benefits from excellent accessibility. Caversham Road is a main road into Reading centre, half a mile from the main railway station and walking distance to shops and employment centres. On-street parking opposite the property is available if required.
- 3.3. The hotel is formed from two semi-detached three-storey properties, painted in grey with white details with a tiled pitched roof.

4. Planning Policy

- 4.1. Under section 38 (6) of the Planning and Compulsory Purchase Act 2004, if regard is to be given to the development plan for the purpose of any determination to be made under the Planning Act, the determination must be made in accordance with the plan unless material considerations indicate otherwise. In this case, this is the Reading Local Plan (2019).
- 4.2. National planning guidance including the National Planning Policy Framework ('NPPF') and National Planning Policy Guidance ('NPPG') and supplementary planning guidance, among other matters, are relevant material considerations and are considered below.

Principle of Development

- 4.3. The NPPF was revised in December 2024 to facilitate significant housebuilding across the country to meet unmet demand. It sets out that LPAs should facilitate 'a sufficient amount and variety of land to come forward' (para.61) and that 'the needs of groups with specific housing requirements are addressed' (para.61). 'The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community' (para.61). This proposed HMO will contribute towards meeting the housing needs of Reading and the wider area, and provide cost-effective accommodation in a sustainable location, bringing into use an under-used hotel property.
- 4.4. The NPPF also states that 'planning decisions should promote an effective use of land' (para.124), which includes repurposing existing vacant and underused properties for housing. The proposal embodies principles of sustainable development by making efficient use of an existing building in a highly accessible urban location. This reduces the need for new construction on potentially less sustainable sites and minimises the environmental footprint. Where feasible, the refurbishment will incorporate measures to improve energy efficiency in line with LPP2 Policy 23.
- 4.5. Policy H8 of the Reading Local Plan (2019) states proposals for the change of use of a property to an HMO will be assessed against the impact on the amenity and character of the surrounding area, particularly in terms of intensification of activity, loss of privacy, loss of external amenity space, the provision and location of adequate on-site car parking and the treatment of bin storage areas and other related servicing. To take each of these in turn:

- 4.6. The amenity and character of the surrounding area will experience a slight betterment in terms of number of movements and introducing more permanent residents to the area represents a reduction in intensification in activity. The character is mixed as set out above, with a number of flats, hotels and HMOs along Caversham Road, albeit not an over-concentration. The current use of the building as hotel / serviced apartments means there will not be an increase in the number of rooms, just the type of stay.
- 4.7. There will be no loss of privacy for neighbours or occupiers as a result of the proposals, with no changes to overlooking or access arrangements. The external amenity space will not change, albeit being used by permanent residents and maintained as such by the Applicant.
- 4.8. There are no proposed changes to parking arrangements, and the Site is highly sustainable. This is set out in more detail below.
- 4.9. Dedicated bin storage areas are provided within a bin storage area to the front of the property, located for easy access for collection, and designed to be in keeping with the existing property and street scene.
- 4.10. In addition, the proposal respects the physical character of the area, with no changes to the external appearance of the property and its ongoing use ensuring it remains well-presented. The property is not currently a single (or other) family dwelling, and therefore this conversion presents no loss of family accommodation – instead making a net gain to Reading's housing stock.
- 4.11. There will be no unacceptable adverse impacts to future residents or to neighbours, being a professionally managed HMO which will be inhabited by professional tenants. There is not an over-concentration of HMOs in the area, and each room is significantly larger than minimum standards, arranged in a suitable layout acceptable to HMO Licensing. The property measures more than 120sqm in total and provides significant community space.
- 4.12. The Local Plan makes reference to the aim of encouraging a supply of high-quality affordable housing. The applicant believes they have already demonstrated the superior nature of the accommodation they are offering, but also how affordable this type of accommodation will be with all-inclusive room rents. The applicant also believes that by offering this type of accommodation, they are enhancing the choice for local tenants and assist with achieving balanced communities and supporting the local economy.
- 4.13. The applicant is confident that the change of use will not have a negative impact on neighbourhood amenity. The property will not contain more residents than a large family and all tenants will be vetted prior to their tenancy beginning. The Tenancy Agreement will also have stipulations in relation to respect for neighbours with particular regard for parking and noise. There will be regular inspections to ensure the property is maintaining the highest standards and cleaned weekly.
- 4.14. In addition to the Local Plan, the Residential Conversions SPD (2023) sets out a checklist of properties proposed for conversion must meet in order to be deemed acceptable. This proposed change of use fully complies with these requirements, as set out below:

Checklist	
164-166 Caversham Road	
Checklist 1 (H8, H9, CC8, EN1, EN3, EN4): Any external alterations must be carried out sympathetically, respecting the physical character of the area.	No external alterations are proposed

Checklist 2 (CC8, H9, H10, EN1, EN3, EN4): Extensions must achieve acceptable residential amenity for existing and new occupiers plus respect the character of the existing house and area ensuring outside amenity space is not unacceptably reduced.	There are no extensions proposed
Checklist 3 (H8): Any residential conversion must contribute to achieving an appropriately mixed and sustainable community by providing an acceptable housing mix, ensuring that, as appropriate, single family housing remains the dominant form of dwelling in the vicinity of the application, taking account of the relevant threshold approach, and ensuring there is not a detrimental impact on the physical character of the area.	There are a mix of dwelling types in the vicinity of the property, being predominantly single dwellings but also flats and commercial properties
Checklist 4 (CC8, H8): A proposal for conversion should not result in a dwellinghouse being located directly between two HMOs.	This will not be the result of the proposed change of use
Checklist 5 (H10): An appropriate level of private outdoor space will be expected.	Outdoor amenity space is provided to the rear
Checklist 6 (CC8, H8): Issues such as those below need to be taken into account in any residential conversions application: • Privacy and overlooking; • Access to sunlight and daylight; • Visual dominance and overbearing effects of a development; • Noise and disturbance; and • Crime and safety.	These issues have all been carefully considered as part of this proposal: • There will be no impact on privacy and overlooking, given no exterior alterations; • All rooms have at least one openable window and provide access to daylight and sunlight; • There will be no change to exterior appearance and effect on the street scene; • The property will be professionally managed and inhabited by vetted, professional tenants on a permanent basis, providing a betterment from temporary stays currently taking place. There will therefore be no impact on noise and disturbance; • Permanent occupation of the property will provide casual surveillance and could contribute to improved crime and safety in the area.
Checklist 7 (H8): The property to be converted to a flat or large HMO should have four or more bedrooms or measure more than 120 square metres gross. When calculating the floor area of the property the measurement should be based on the external dimensions ten years before the application is determined or when built (whichever is the later).	The property measures c.192sqm and has not been extended in the past 10 years.
Checklist 8 (CC8, H8): Internal floorspace and headroom should be provided in all forms of residential resulting from conversions to allow for a high quality of life. The nationally-described space standards provide a good basis for assessment.	Bedroom sizes range from 9.37sqm to 17.23sqm plus ensuite bathrooms. A shared kitchen and lounge is also provided for tenants to use.
Checklist 9 (CC8, H8): It will be necessary to ensure appropriate sound insulation between proposed and neighbouring units before a converted property is occupied.	The change of use will comply with all Building Regulations, including Approved Document E which covers soundproofing.

Checklist 10 (CC8, H8): Acceptable proposals for layouts will 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.	This is proposed, see attached plans.
Checklist 11 (CC8, H8): Habitable rooms, such as living rooms and bedrooms, will include an external window. The provision of natural light and ventilation is a legal requirement under Environmental Health legislation.	As above, this is proposed for each room.
Checklist 12 (CC8, H8): Proposals for self-contained units solely within a basement will normally be permitted where this unit would benefit from dual aspect*, an acceptable outlook** and sufficient headroom***.	This is not relevant to this application.
Checklist 13 (H8): Proposals which seek to convert attic/loft space will normally be permitted where the attic/loft space would benefit from sufficient headroom and is incorporated into a self-contained unit which is split over two floors of accommodation.	The upper floors are already used as rooms for serviced apartments, no conversion is required. Sufficient headspace is provided.
Checklist 14 (H8, TR5): Parking standards for all residential conversions should be in accordance with the Council's adopted Revised Parking Standards and Design SPD (2011) or any successor.	The Parking SPD requires 0.25 spaces per bedroom, which suggests 7 spaces are required. However, the property is in a highly accessible location and it would not be appropriate to provide this level of parking in this location. 5 parking spaces are provided and occupiers will not be entitled to parking permits and would understand this on taking a room.
Checklist 15: HMOs located within a street where a residents' parking permit scheme operates will not be entitled to on-street car parking permits. The same restrictions may apply to new flats in such streets, see the Revised Parking Standards and Design SPD.	This is not relevant to this application.
Checklist 16 (CC7, H8, H9, EN1, EN3, EN4): Removal of boundary treatment to accommodate parking or access to parking will not be permitted where it makes a valuable contribution to the character of the area.	This is not relevant to this application.
Checklist 17 (TR5, CC8, H8): 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.	Cycle storage is proposed to be provided to the rear of the property. The design and quantum of spaces can be secured by condition.
Checklist 18 (H8, H10, H11, EN1, EN4): Sufficient and suitable refuse containers should be provided within the curtilage of the application building which are easily accessible for all occupants of the house and the refuse collectors and ensuring they are sympathetically located with regard to their visual impact.	Refuse storage is proposed to be provided to the front of the property. The design can be secured by condition.
Checklist 19 (CC7): Where possible, a level access from the public highway to the building's principal entrance should be provided or retained.	This is provided to the front and rear.

Checklist 20 (EN1): 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 protect and where possible enhance the significance of the listed building.	This is not relevant to this application.
Checklist 21 (CC9, H3, TR1, EN9, H3, H6): Developers should compensate for loss or damage created by a development and mitigate any impact caused. A planning obligation to secure a financial or other contribution towards physical or social infrastructure improvements may be sought.	This is not believed relevant to this application, but the Applicant would be happy to discuss with the LPA as required.
Checklist 22: The Council can serve an Enforcement Notice where conversion works have been carried out without planning permission. This action can result in the unauthorised works being removed (or the unauthorised use discontinued) and the building/ use being reinstated. Non-compliance with the provisions of an enforcement notice constitutes a criminal offence.	This is not relevant to this application.
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 (which may require planning permission in their own right).	The Applicant has engaged with Building Control.
Checklist 24: The HMO team should be contacted about Environmental Health matters.	The Applicant has engaged with HMO Licensing.
Checklist 25 (H8) for conversions to flats: At least one unit of accommodation created should be suitable for family occupation with a minimum of two bedrooms.	This is not relevant to this application.
Checklist 26 (H8) for conversions to sui generis HMOs: A standard of one communal room for every 4-6 bedrooms (depending on the size of the bedroom) will be provided, which will have acceptable amenity standards and appropriate access for all residents.	Significant communal space is provided as a kitchen and shared lounge, as agreed with HMO Licensing
Checklist 27 for conversions to sui generis HMOs: A proper agreement may be required to ensure acceptable management of all communal parts of the HMO.	A management agreement will be provided.

Design

- 4.15. There will be no exterior changes as part of this change of use. Outdoor seating and planting will be provided in a dedicated outdoor amenity space for tenants to enjoy. These will be sympathetic to the character and appearance of the local area. Keeping the property in use means it will be well maintained, and will make a positive contribution to the sense of place. It is of attractive materials with considerate detailing which will not be changed and makes no further impact on the street scene. The proposed change of use will have regard to local context and help create an attractive, safe and inclusive environment.
- 4.16. As set out in Policy CC2, the conversion will incorporate water conservation measures and rainwater harvesting, details of which can be secured by condition.

- 4.17. Internally, the property has been refurbished to provide a high-quality living environment for all residents. Each room is a generous size, exceeding national and local minimum space standards. Crucially, the scheme incorporates ample shared facilities, including modern kitchen/dining areas and bathroom for each tenant and an additional toilet/shower, along with dedicated communal living space. This ensures a comfortable and well-appointed living experience, addressing the amenity standards expected under LPP2 Policy 14.

Highway Impact and Access

- 4.18. The existing access will not be changed. Policy TR3 states that where additional trips on the transport network are generated, consideration will be given to the effect on safety, congestion and the environment. Reading centre is half a mile from the property, an easy walking distance and there are bus stops located along Caversham Road providing direct access to the city centre, university and centres of employment. Information from tenants in our other properties shows that on average 40% own a car and even fewer use one for regular trips such as to work. It is expected this would be reflected in the proposed HMO, due to its very sustainable location.
- 4.19. The Parking SPD is guidance only, and requires 0.25 spaces per bedroom, which suggests 7 car parking spaces are required. However, the property is in a highly accessible location and it would not be appropriate to provide this level of parking in this location. 5 spaces are provided and occupiers will not be entitled to parking permits and would understand this on taking a room.
- 4.20. Cycle parking is also provided in a secure location in a dedicated bike store, to promote the use of sustainable travel to/from the site where possible. The quantum and location can be secured by planning condition.
- 4.21. It should also be noted that the level of trip generation will be reduced in comparison to the existing use, with fewer visitor and staff trips. It is therefore suggested that the Proposed Development will have a neutral or negative effect on the highway network.

Change from Hotel

- 4.22. There are no policies in the Local Plan relating to loss of hotels. As a serviced apartment / apart-hotel operation, it is not considered that change of use to HMO would be a loss of employment given the number of staff employed to manage the property (one manager (the Applicant) and a cleaner) would remain the same once the change of use has occurred.

Flood Risk

- 4.23. Policy EN18 states that *'Where development in areas at risk of flooding is necessary, it will not reduce the capacity of the flood plain to store floodwater, impede the flow of floodwater or in any way increase the risks to life and property arising from flooding. Wherever possible, development should be designed to reduce flood risk, both on- and off-site.'*
- 4.24. The EA Flood Map for Planning shows the site is within Flood Risk Zone 3, with the front of the property in Flood Zone 2. No sleeping accommodation is proposed in the part of the property within Flood Zone 3. A Flood Risk Assessment prepared by Calibro accompanies this application concludes:
- The majority of the building is above the 1 in 1,000 year flood level and should be classified as Flood Zone 1. Floor levels at the rear of the property are above the 1 in 100 year flood level but below the 1 in 1,000 year level and should be classified as Flood Zone 2;
 - The 1 in 100 year +35% event outputs are a reasonable proxy for the design event which according to policy is the 1 in 100 year +31% event. In this event, the modelled flood level is 38.34mAOD which is comfortably below finished floor levels at the front of the property (38.56-38.68mAOD). No mitigation is necessary at the front of the property to make the development safe from flooding;

- The finished levels at the rear of the property are between 0.13 and 0.22 metres below the design flood event. It is proposed to install flood proof doors, flood proof airbricks and seal all service entry point to prevent flooding during the design event. With these measures in place the development will be safe from flooding for the next 100 years and be compliant with policy;
- To further safeguard the occupants from flooding events it is recommended that a proportional flood emergency management plan is produced which can be secured by condition;
- The existing and proposed uses are classed as 'more vulnerable', therefore the vulnerability of the site will remain the same post development;
- Comparison of the modelled flood level for the 1:100 year plus 30% climate change event with ground floor finished levels shows the site to be up to 0.33m and 0.38m above the flood level;
- The rear yard is shown to be at risk of shallow flooding of up to 0.2m in a future 1 in 1,000 year rainfall event. This should not pose a major hazard to occupants as this is caused by water ponding and consequently velocities will be low;
- The site is not considered to be at significant risk from any other source of flooding.

4.25. As set out in the NPPF and PPG, a sequential test is not required for a change of use application. The proposal therefore fully complies with the NPPF and local planning policy.

Environment and Biodiversity

4.26. The provisions of the Environment Act 2021 require development to provide a minimum of 10% biodiversity net gain ('BNG'). However, this is an existing building changing use with no ecological presence on site, and the proposed development would therefore fall into the 'de minimus' requirement.

4.27. That being said, the Applicant is committed to providing a high-quality development which enhances the local area, and through provision of planting in the external space will enhance BNG on-site as part of the proposed development, in accordance with point b) of Policy EN12.

Other Matters

4.28. The property is not listed nor in a Conservation Area. Given the limited nature of the external alterations, further assessment regarding heritage impact is therefore not appropriate at this stage.

5. Summary and Conclusions

5.1. The Proposed Development is on previously developed land within a built up area. It will sensitively bring back into residential use an underused building and provide accommodation at an appropriate density for the Site which makes best use of the land.

5.2. It is sustainably located, being within walking distance of the city centre and train station.

5.3. Amenity of neighbours will not be affected and a high-quality refurbishment will provide a high standard of living for future occupiers.

5.4. The limited external work is in keeping with the wider area and landscaping and pot planting will enhance the street scene and provide biodiversity net gain.

5.5. The Proposed Development will provide much-needed residential accommodation for a range of future occupiers as a single dwelling and high-quality HMO for professionals.

5.6. The proposal therefore complies with the Development Plan and the National Planning Policy Framework, and we respectfully request that planning permission is granted without delay.

Appendix – Photos of HMO Properties Owned and Operated by RAM Bennett Ltd

