Leader Planning

Town Planning Consultants

Planning, Sustainability & Transport Statement

The Jolly Anglers, Kennet Sde, Reading

January 2026

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1.0 Introduction

The Proposed Development

1.1 This Planning Statement has been prepared in support of a full planning application for the erection of a part single part 2 storey rear extension and the change of use of the upper floors to a large house in multiple occupation

1.2 The applicant is seeking an alternative/mixed use for the site and the use as a large HMO is considered to be the best use of the site given the need for housing in the area and the sustainable location of the site.

The Site and context

1.3 The site is a vacant pub with some residential accommodation above adjacent to the River Kennet towpath. The site has a significant difference in levels between the ground floor front entrance, accessed from the towpath and the rear of the site (at higher ground). The former pub garden is accessed from a steep set of steps, which is shared with the adjoining terraced property (no. 218), as this is also their access to a rear garden.

1.4 The former pub outside space comprises a swimming pool, outside terraces, one at a lower level, and covered, former seating areas, outside bar area and outside room. A large proportion of the rear area has been brought up to the highest level (i.e. level with the rear road Avon Place) with the use of decking structures over voids beneath.

1.5 The application site is part of a terraced group of 2 storey residential properties, and likely developed from a very historic conversion and merging of original terraced properties as part of the group.

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1.6 Adjoining to the east are flats varying in height from 3-4 storeys (as viewed from the towpath) and two-storey at the rear ground level.

1.7 A detailed assessment of the character of the area and the design rational for the proposed development is set out within the Design and Access Statement. This statement sets out the rational for the proposed development and an assessment of how the proposal complies with the national and local planning policy.

Key Features of the Proposed Development

1.8 The key features of the proposed development are:

- A sympathetic development of the site using sensitive materials and bespoke design.
- A form of development that blends in well to its surroundings and is consistent in scale to development in the environs.
- Making efficient and best use of a sustainable site.
- The provision of new residential accommodation, itself social benefit, in a sustainable location where there is a shortfall recognised by the LPA.

1.9 The conclusion of this statement is that the proposals constitute a sensitive and sustainable form of development that will enhance the wider character and appearance of the area.

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2.0 Pre application engagement

2.1 The applicant has engaged and worked closely with the planning authority at the pre application stage (pre app ref number PL/24/1644). The applicant has taken on board advice received from officers and this has informed the current submission.

2.2 The Council's pre application response was supportive of the principle of an HMO given the sustainable location. Advice was that the principle of the loss of the public house use would need to be justified in any planning submission.

2.3 The size and scale of the extension was considered to be too large for the site and guidance was provided in respect of minimum standards for HMO accommodation.

2.4 The comments have been incorporated into the revised scheme, the size of the rear extension has been reduced and the pub has been retained on the ground floor. The pre application process has been valuable in this instance and has helped to ensure the submitted scheme is high quality and policy compliant.

3.0 Planning Policy

3.1 The starting point for the determination of this application is the provision of the Development Plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states determination must be made in accordance with the Plan unless material consideration indicates otherwise.

3.2 The statutory development plan constitutes the following:

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- Adopted Reading Borough Local Plan (2019)

Relevant polices include the following:

CC1: Presumption in Favour of Sustainable Development
CC2: Sustainable Design and Construction Policy
CC3: Adaptation to Climate Change Policy
CC5: Waste Minimisation and Storage Policy
CC6: Accessibility and the Intensity of Development Policy
CC7: Design and the Public Realm Policy
CC8: Safeguarding Amenity Policy
EN12: Biodiversity and the Green Network Policy
EN14: Trees, Hedges and Woodland Policy
EN18: Flooding and Drainage Policy
RL6: Protection of Leisure Facilities and Public Houses Policy
H8: Residential Conversions Policy
H10: Private and Communal Outdoor Space Policy
TR1: Achieving the Transport Strategy Policy
TR3: Access, Traffic and Highway-Related Matters Policy
TR4: Cycle Routes and Facilities Policy
TR5: Car and Cycle Parking and Electric Vehicle Charging

The National Planning Policy Framework (2024) is also a material consideration in the determination of planning applications. As are relevant Supplementary Planning Documents (SPDs).

3.3 The National Planning Policy Framework sets out the Government's economic, environmental and social planning policies for England. It is a material consideration when determining all planning applications in England.

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3.4 The NPPF establishes the presumption in favour of sustainable development at Paragraph 7. Paragraph 8 establishes the three overarching objectives of the planning system to achieve sustainable development.

3.5 Chapter 16 of the NPPF concerns heritage matters and sets out how heritage assets should be sustained and enhanced and how local authorities should determine applications involving heritage assets. In March 2014, the Department for Communities and Local Government ('DCLG') launched its web-based Planning Practice Guidance ('PPG') resource. This aims to provide guidance which is useable in an up-to-date and accessible manner with chapters being updated at differing times.

3.6 The PPG outlines how government planning practice should be followed and interpreted in accordance with the principles of the NPPF. With regard to decision making, the guidelines set out in the PPG are a material consideration and accordingly should carry weight in the determining of planning applications.

Supplementary Planning Documents

• Revised Parking Standards and Design (2011)
• Residential Conversions (2023)
• Sustainable Design and Construction SPD (2019) Other
• Guide to Amenity Standards applicable to Houses in Multiple Occupation that require a Licence, RBC

4.0 Key Planning Considerations

4.1 Paragraph 11 of the NPPF states that there is a presumption in favour of sustainable development, and that development that accords with an up-to-

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date Local Plan should be approved. For the reasons set out within this statement, the Proposed Development is considered to be in accordance with the key policies contained in the development plan and represents sustainable development. The key planning considerations associated with this proposal are considered to be the following:

- Principal of development
- Sustainability
- Design and character of the area
- Quality accommodation
- Residential amenity
- Transport and parking
- Landscape and Ecology
- Drainage and flood risk

Principal of development

4.2 The current lawful use of the site is a public house however; it has fallen into disrepair. The proposed development seeks to extend the building and change the use of the upper floors to provide a large HMO. A previous application sought the change of use of the whole of the public house to an HMO. In this respect the relevant policy consideration is Policy RL6. The policy states that existing leisure facilities or public houses will generally be retained and that within centres there is a strong presumption against loss.

4.3 The previous application was refused since the Council considered that insufficient evidence was provided in respect of the loss of the pub. The current application has retained the pub use which will now be supported by the HMO accommodation prosed at first and second floor levels.

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4.4 The pre app response stated that retaining some pub use to the ground floor would be more favourable to complete loss, subject to ensuring that the layout would be appropriate for a mixed use (with HMO use), being designed in such a way that would ensure the future viability of the pub, and that amenity considerations could be adequately addressed for future residents.

4.5 In respect of the principle of a large HMO in this location the acceptability of a change of use and extension to create a large HMO use would be assessed against Policy H8 and the supporting guidance within the Council's Residential Conversions SPD. Policy H8 (Residential Conversions), states that:

"Proposals to convert buildings into self-contained flats or for multiple occupation 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. Proposals to convert properties into self-contained flats or for multiple occupation will only be acceptable where:

• The proposal respects the physical character of the area in terms of scale, location, materials and design, the arrangement of doors, windows and other principal architectural features;
• The proposal would not, either individually or cumulatively, unduly dilute or harm an existing mixed and sustainable community through the significant loss of single family housing;
• There are no unacceptable adverse impacts to residents of the scheme or surrounding properties arising from noise and disturbance in terms of the number and layout of units proposed and the proximity to other properties;
• There is no inappropriate stacking and location of rooms between units;

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• Bin and cycle storage is of an appropriate size and standard for the units proposed and should be located at ground floor level with easy access; and
• The resulting property or properties would provide adequate internal floorspace and headroom for residents……..”

“Additionally, in the case of sui generis houses in multiple occupation (HMOs):
• The property to be converted measures more than 120 square metres gross.
• There is sufficient communal space.”

4.6 The adopted Residential Conversions SPD (2023) provides further guidance on the interpretation of the adopted policies. Section 2 of the SPD deals with ‘All Conversions’, Section 4 ‘Sui Generis HMOs’. 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 site, taking account of the relevant threshold approach (as detailed within the SPD), and ensuring there is not a detrimental impact on the physical character of the area. In addition, the property for conversion must be 120sqm or more when measured externally.

4.7 The existing property would meet the relevant size criteria and as the property is already in non residential use its part change to an HMO would have no further effect on the concentration of HMOs and balance and mix of households in the local community. The change of use of part of the existing public house to an HMO use is, therefore, considered acceptable in principle subject to meeting other material considerations below.

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Sustainability

4.8 The site is in a sustainable location being within walking distance of a number of local facilities as well as good public transport connections. A key strand in the NPPF is that development which is sustainable should go ahead without delay. The Proposed Development is sustainable on the following economic, social and environmental grounds:

Economic role / economic gains

- it could be brought forward quickly because it is available and achievable; it would represent the delivery of inward investment to the local economy that would be a signal of investor confidence at a time of uncertainty;
- it would foster sustainable economic growth; and
- the new residents would create additional expenditure that would boost local spending to reinforce the vitality and viability of surrounding facilities including shops, cafes, restaurants, public houses etc;

Social role / social gains

- it is a developable 'windfall site' that would contribute towards the supply of deliverable residential accommodation;
- it would deliver a much-needed high quality homes; and
- it would create positive linkages with the existing community.

Environmental gains

- the Site is in a sustainable and accessible location;
- it would introduce bicycle parking facilities; and

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- it would utilise sustainable construction methods and utilise previously developed land.

4.9 All these positive impacts are material to the decision-making process and they are compelling. They would clearly serve the overall public interest. Without the benefit of planning permission, all of these important benefits in the local area would not materialise.

4.10 In summary, the proposed development is located in a sustainable location and the provision of additional housing on this site is considered to be acceptable in principle.

Design and character of the area

4.11 The NPPF identifies that the Government attaches great importance to the design of the built environment and that good design is indivisible from good planning. The importance of good design is re-iterated in the Core Strategy which has been produced to help inform the design of new development and ensure all factors of good design are recognised and incorporated. This statement, provides detailed information on the design rationale for this scheme having regard to national planning policy guidance and the design polices set out with the Development Plan.

4.12 Local planning authorities are charged with delivering a sufficient amount of housing and variety of land and to boost significantly the supply of housing by identifying sites for development, maintaining a supply of deliverable sites and to generally consider housing applications in the context of the presumption in favour of sustainable development. The current proposal seeks to make best use of the site whilst also seeking to preserve and enhance the character and appearance of the wider area.

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4.13 Reading Borough Local Plan (RBLP) Policy CC7: Design and the Public Realm, requires all development to be of a “high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.

4.14 The density of development proposed will make efficient use of the land, whilst protecting features of interest within and adjacent to the site and creating a well designed, attractive and healthy place. The layout plans show how the quantum of development can be delivered to achieve an efficient use of the site whilst respecting the site context.

4.15 The plans and information submitted shows that the development will function well and add to the overall quality of the area, and sympathetic to the local character including the landscape setting, in accordance with the Framework.

4.16 An assessment of the site constraints is set out in the Design and Access Statement. The site constraints have influenced the layout of the proposal taking into account the need to ensure no adverse impact on the neighbouring properties. The site is also an ‘island site’ and has a frontage to the front and rear. The height is considered to be appropriate for the site and we have taken onboard the comments received at the pre app stage.

4.17 As set out in the DAS the site has taken full account of the significant physical constraints of the site. The Design and Access Statement submitted with this application details how the design of the proposed development has been informed by a thorough analysis and understanding of the site context and site constraints. The end result is a high-quality design which is based on established design principles and which is informed by the established character of the area. This comprehensive approach ensures that the proposal

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is fully in accordance with the NPPF and local planning policy. The following paragraphs provide a summary of the design approach and how the proposal complies with the relevant national and local planning policies in general terms.

4.18 In summary the sensitive development of the site in the manner proposed will significantly enhance the character of the area whilst making best use of the site. The design and scale of the proposed development has been informed by a comprehensive Character Assessment of the surrounding area and the final design has incorporated the common themes identified as part of the design process. As such the proposed development is considered to be appropriate for the site, striking the right balance between making best use of land and respecting the site context and established character and appearance of the surrounding area.

Quality of housing

4.19 The SPD refers to the nationally described space standards (Technical housing standards – nationally described space standard', 2015, DCLG) as a useful starting point. It should be noted, however, that Reading Borough Council has a "Guide to Amenity Standards applicable to Houses in Multiple Occupation that require a Licence" (i.e. those for 5 persons or more) https://www.reading.gov.uk/housing/private-renting/landlords/houses-in-multiple-occupationhmos/guide-to-amenity-standards-for-houses-in-multiple-occupation/ which references the standards for HMOs as set out in the 'The Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018'. Regulation 2 refers to national minimum standards for sleeping accommodation as:

• 6.51 square metres for one person aged 10 years or over;

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• 10.5 square metres for two persons aged 10 years or over; The proposed room sizes would meet the space standards

4.20 The SPD identifies that the amount of communal space that is considered appropriate in a large HMO would be dependent on the number and size of bedrooms. The standard set out is for one communal room for every 4-6 bedrooms depending on the size of the bedroom.

4.21 The proposed design and layout comply with space standards and minimum room sizes in all regards and is considered to provide a high-quality residential development.

Residential Amenity

4.22 The application site is located within a residential area and the proposed development has been sensitively designed in order to take account of the site. The local plan states that development proposals should deliver appropriate outlook, privacy and amenity, and should help prevent or mitigate the impacts of noise and poor air quality. Development proposals to “have regard to the amenities of occupants and neighbours, including in terms of privacy, outlook, sunlight/daylight, avoidance of visual intrusion and noise and disturbance”.

4.23 The closest residential properties are adjoining the site directly to the west. The scale and location of the proposed extension is not considered to be overbearing or result in a loss of light to the neighbouring properties. The design and layout takes the relationship into account and is set on the opposite side of the site to ensure there is adequate separation distances. Although the rear extension extends the depth of the site this is at lower ground level and as such will not be perceptible when viewed from the neighbouring properties.

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Due to the layout of the flatted development to the east of the site there is far greater separation distance to the closest residential property,

4.24 Overall, the proposal is not considered to result in an undue impact on the amenity of neighbours or future occupiers and is consistent with Policy.

Transport and parking

4.25 NPPF Paragraph 111 states, 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.' The site is located in Zone 2, Primary Core Area, of the Revised Parking Standards and Design SPD. This zone directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading. Typically this zone is well served by public transport, with buses continuing either into or out of the Central Core Area via this zone.

4.26 The Parking Standards do not provide any flexibility for where sites are sustainably located, paragraph 107 of the NPPF notes that when setting parking standards, factors such as this should be taken into account.

4.27 Given the type of development proposed, which is also a factor listed within paragraph 107 of the NPPF, typical occupiers of smaller dwellings are less likely to own cars. It is also likely that people may choose this development due to the opportunity to not need to rely on the use of a car, and those who do rely on a car would be less likely to choose a site with no parking provision. Although the scheme is under the prescribed level in the Parking SPD, the scheme allows for a choice of all modes including the car.

4.28 In accordance with the Council's Parking Standards and Design SPD, cycle storage for a HMO should be provided at a ratio of 0.5 secure cycle storage spaces for each letting room in the form of a Sheffield type stand within a

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lockable store. Location and access of the storage units are illustrated on plans.

4.29 Given all of the above it is considered that the parking provision is satisfactory in this particular case, especially when taking into account the context of the site and type of development proposed.

Landscape and Ecology

4.30 The overarching design policy CC7 makes it clear that the "…provision of green infrastructure and landscaping" is a key component of development form, which contributes to maintaining and enhancing the character and appearance of an area. Policy EN12 requires that development should provide a "net gain for biodiversity wherever possible…. and wherever possible enhance features of biodiversity interest on and adjacent to the application site… Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable."

Surveys carried out:

1. Preliminary ecological appraisal,
2. Biodiversity impact assessment

The initial ecological appraisal that was undertaken identified that there were no habitats of principle importance within the site.

Bird nesting features

4.31 To provide enhancements for birds, nesting features will be incorporated where possible and practicable into the new building designs. The design will

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seek to provide nesting features which can be integrated into the fabric of an external wall or bolted onto an external wall/under eaves to target summer migrants and other passerines including house martin, swift, house sparrow and other small passerines.

Residual Effects

4.32 There are very few potential adverse impacts associated with the change in use of this low quality land/ habitat. The development will provide alternative and better quality habitat for target species, particularly bats and birds, which includes more planting and providing bat bricks and bird nesting boxes. These design features will protect existing habitat and enhance the site so that a variety of species can use it in the long-term, in accordance with national and local biodiversity planning policy.

4.33 This ensures that the proposed development will not have adverse impacts on the ability of local wildlife to survive, breed or reproduce, to rear or nurture their young or to hibernate or migrate, and would actively improve the situation for target species such as bats and birds. The proposed scheme will not adversely affect the local distribution or abundance of local wildlife species. Therefore, the long-term ecological effects are considered to be positive at the site scale.

4.34 Overall, as a result of the design approach adopted it is clear that the proposed development will significantly enhance the biodiversity value of the site in accordance with national and local planning policy.

Flood risk and drainage

4.35 The front of the site is within Flood Zone 2 (medium probability of flooding) and the remainder is in Flood Zone 1. The National Planning Practice Guidance

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(NPPG) identifies that 'more vulnerable' development, which includes residential, will only be compatible within this flood zone if it meets the requirements of the Sequential Test. The Sequential Test seeks to steer development to areas at the lowest probability of flooding and only where there are no reasonably available sites in Flood Zones 1 should sites in Zone 3 be considered. However, the NPPG goes on to state that the Sequential Test does not need to be applied to applications for changes of use, and this would apply to this proposal as the part within Flood Zone 2 is the existing building proposed for change of use. The extensions would be within Flood Zone 1, but would likely require regrading of land to level the site to the same level as the front of the site. It is unknown how much of the existing site, underneath the decked elevated area, is at the same/ similar ground level to the front of the site. This may impact on the associated flood risk of the site. In any case, there is a requirement for a site-specific flood risk assessment as part of a formal application submission.

4.36 The application id supported by a detailed Flood Risk Assessment which concludes that the application is acceptable with regards to flood risk and drainage.

SUMMARY AND CONCLUSIONS

4.37 The application has been evaluated against the development plan and against the core planning principles of the NPPF and whether the proposals deliver 'sustainable development'. Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development which for decision taking this means approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the

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application are out-of-date, granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

4.38 The development would make a contribution to the housing land supply which is a significant benefit to be attributed positive weight in the planning balance. There would also be economic benefits in terms of the construction of the development itself and those associated with the resultant increase in population on the site to which positive weight should be attached.

4.39 Compliance with some of the other principles of the NPPF have been demonstrated in terms of impacts on local amenity, requiring good design, sustainable transport, making effective use of land and conserving and enhancing the natural environment.

4.40 Weighing all the relevant factors into the planning balance, and having regard to the NPPF as a whole, all relevant policies of the development plan and supplementary planning documents and guidance it is considered that the adverse impacts would not significantly and demonstrably outweigh the benefits of the proposal. It is therefore recommended that the application is approved.

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