

COMMITTEE REPORT

BY THE EXECUTIVE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES
READING BOROUGH COUNCIL
PLANNING APPLICATIONS COMMITTEE: December 11th 2019

Ward: Abbey

App No.: 191088

Address: Crowne Plaza Reading, Richfield Avenue, Reading, RG1 8BD

Proposal: Redevelopment of former Crowne Plaza Hotel car park and construction of new 132-bed hotel (Use Class C1), with associated access, car parking and landscaping.

Applicant: RBH Hospitality Management

Deadline: 02/10/2019

Extended Deadline: 13/12/2019

Planning Guarantee 26 week target: 1/1/2020

RECOMMENDATION:

Refusal:

- 1) The layout does not comply with the Local Planning Authority's standards in respect of vehicle parking. This could result in on-street parking/reversing movements on Richfield Avenue, and Thames Side Promenade, adversely affecting road safety and the flow of traffic, in conflict with Reading Borough Local Plan Policies TR5 and TR3.
- 2) Insufficient information has been submitted with the planning application to enable the highways, traffic and transportation implications of the proposed development to be fully assessed. From the information submitted, it is considered that the additional traffic likely to be generated by the proposal would adversely affect the safety and flow of users of the existing road network within Reading, contrary to Reading Borough Local Plan Policies CC6, TR1 and TR3.
- 3) The proposed development does not comply with the Local Planning Authority's standards as no dedicated servicing has been provided, which will impact on the proposed car park causing potential conflict between vehicles and pedestrians, which would conflict with Reading Borough Local Plan Policy TR3.
- 4) The design is not considered to be of a high quality which responds positively to the context, and would not maintain and enhance the character and appearance of the area. Its height and massing would be detrimental to the designated Thames Valley Major Landscape Feature (MLF), by virtue of being a dominant feature within that local landscape, especially with regard to the resultant cumulative effect with existing adjacent buildings, and the views across the MLF, in particular from the north, especially from the St. Peter's Conservation Area, contrary to policy CC7, EN5, EN7, EN11 and EN13.
- 5) Insufficient information has been submitted to establish whether there is ground gas at this site, which could pose a significant risk to end users of the proposed development, and which would be contrary to Reading

Borough Local Plan Policy EN16.

- 6) The supporting information identifies that the proposed scheme could only achieve a 'Very Good' BREEAM rating compared to the 'Excellent' rating required by adopted Policy CC2. It is not considered that sufficient evidence has been presented to demonstrate clearly why policy compliance could not be achieved. The proposal would therefore fail to demonstrate that it would maximise benefits with respect to tackling climate change in conflict with Reading Local Plan Policy CC2 and the aims of Reading Borough Council's Climate Change Strategy.
- 7) In the absence of a completed Section 106 legal agreement to secure contributions towards employment, skills and training; an upgraded pedestrian crossing; public realm; an occupancy restriction to restrict the occupancy for each hotel room to a maximum of 3 months by the same occupier, with no minimum period of occupation; and the proposed gym to remain ancillary to the use as a hotel, the proposal:
 - a) Fails to adequately contribute to the employment, skills or training needs of local people with associated socio-economic harm, contrary to policy CC9, and the Employment, Skills and Training SPD (2013)
 - b) Fails to adequately contribute to the infrastructure for the increased pedestrian movement to and from the site with associated harm to pedestrian safety, contrary to Policy TR3.
 - c) Fails to adequately contribute to the provision of additional public realm infrastructure with associated harm in accessing adequate leisure facilities within the Thames parks, contrary to Policy EN11 and Reading Borough Council Thames Parks Plan.
 - d) Fails to restrict the occupancy to hotel use with ancillary gym with associated potential differing impacts compared to those assessed, contrary to policy CR6.

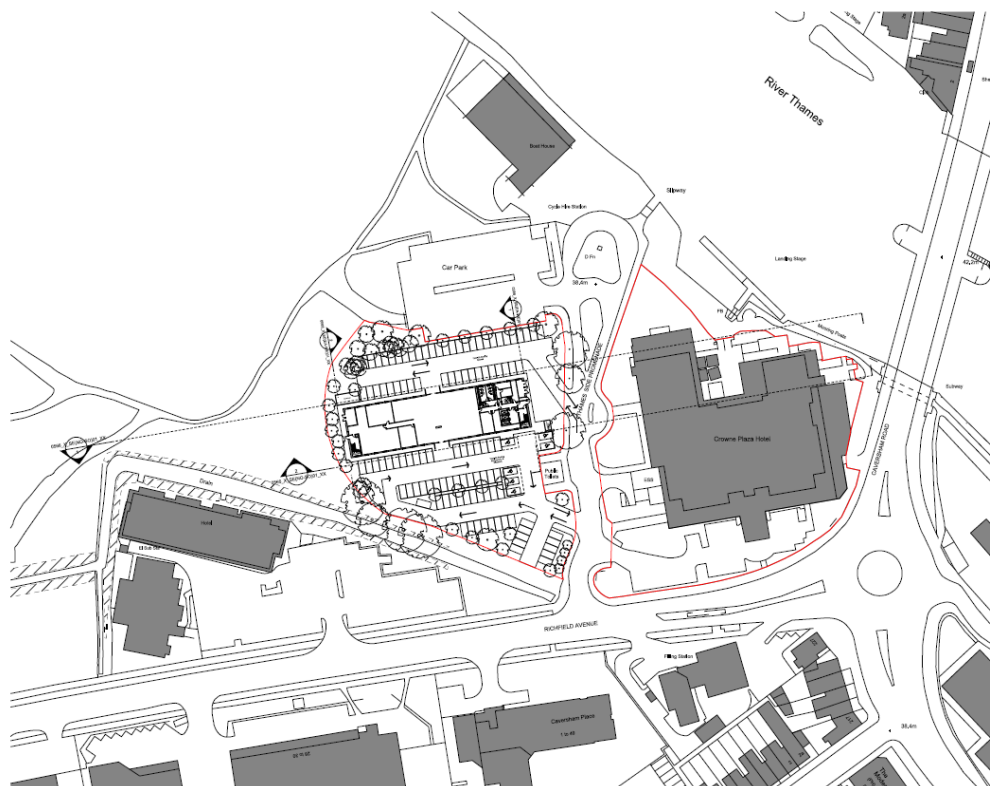
Informatives:

- 1) Positive & Proactive
- 2) Plans assessed

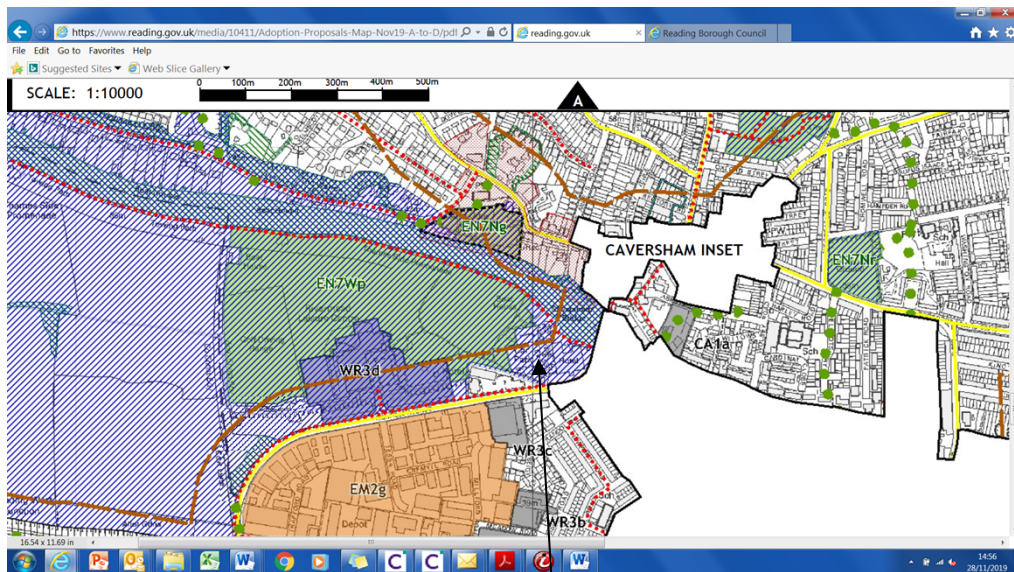
1. INTRODUCTION

- 1.1 The site is located on the northern side of Richfield Avenue between the Crowne Plaza Hotel (next to Caversham Bridge) and The Toby Carvery/Premier Inn. It comprises a relatively flat private car park of the Crowne Plaza Hotel, which has a barrier controlled entrance and is ca. 0.11ha. in area. The submitted location plan, shown below, identifies two red lines, one around the Crowne Plaza Hotel and its immediate curtilage, and one around the existing car park; the application site.
- 1.2 Access to the site is provided via the Thames Side Promenade, which also provides access to the Crowne Plaza Hotel, Reading Rowing Club boat house, public car park, and the River Thames.
- 1.3 The site is bordered by mature trees and there are trees within the car park itself which are protected under TPO (118/09).

- 1.4 Further west is the Rivermead Leisure Centre and a large area of open space.
- 1.5 The surrounding area is of mixed uses comprising hotels, other commercial premises and residential, of a range of styles of design and ages of building. These are mostly at three storeys or fewer, although the residential block on the opposite side of Richfield Avenue extends to four storeys.
- 1.6 Further north is Caversham Court Gardens, which is a Grade II listed registered park and garden and this along with other parts of Caversham adjacent to the River, are within the recently extended St. Peter's Conservation Area.
- 1.7 The site itself is within the Air Quality Management Area (Policy EN15), Flood Risk Zone 2 (Policy EN18), and within the Major Landscape Feature under (Policy EN13). It is also adjacent to the Local Green Space and Public Open Space Policy EN7 - EN7Wp - Rivermead and Thameside Promenade, and just outside the central core (town centre boundary shown white on the extract from the Proposals Map below - to the east of the site).



Site Location Plan



The application site



Aerial view (edged yellow)

2. PROPOSAL

- 2.1 The proposal is for a 132 bed hotel within a five storey building comprising a reception area, café/breakfast area, a small gym and associated back of house facilities.
- 2.2 It would be orientated east-west and would be located centrally within the car park area.
- 2.3 The remaining car parking would provide 118 car parking spaces (including 6 disabled spaces) and 6 cycle spaces.
- 2.4 The supporting information also identifies that it would be the intention of the proposed hotel to benefit from access to facilities

at the existing Crowne Plaza hotel. It would be orientated east-west and would be located centrally within the car park area.

2.5 Submitted Plans and Documentation received 4th July 2019, unless otherwise stated (including amended details):

- Site Location Plan - Drawing no: 0566_X_GA (XX) 01_XX Rev J
- Ground Floor Plan - Drawing no: 0566_X_GA (00) 01_XX Rev G
- First Floor Plan - Drawing no: 0566_X_GA (01) 01_XX Rev B
- Second Floor Plan - Drawing no: 0566_X_GA (02) 01_XX Rev B
- Third Floor Plan - Drawing no: 0566_X_GA (03) 01_XX Rev B
- Fourth Floor Plan - Drawing no: 0566_X_GA (04) 01_XX Rev B
- Roof Plan - Drawing no: 0566_X_GA (RF) 01_XX
- Site Plan - Drawing no: 0566_X_GA (XX) 02_XX Rev F
- North and South Site Elevation - Drawing no: 0566_X_SE (NO-SO) 01_XX Rev E
- North and South Site Elevation - Drawing no: 0566_X_GE (NO-SO) 01_XX Rev C
- East and West Side Elevations - Drawing no: 0566_X_SE (EA-WE) 01_XX Rev C
- East and West Elevations - Drawing no: 0566_X_GE (EA-WE) 01_XX Rev C
- Landscape Planting Plan - Drawing no: SY19-185-LPP-19-01 Rev B, received 9th October 2019
- Landscape Planting Strategy, dated March 2019, ref: SY19-185-LPS-19-02B, prepared by Squires Young Landscape Architecture, received 20th September 2019
- Air Quality Assessment, document ref: 3163r, dated and received 14th October 2019
- Addendum to Transport Assessment: Junction Modelling Note, dated August 2019, document ref: NO8/183733, prepared by Vectos, received 21st August 2019
- Arboricultural Method Statement, dated September 2019, document ref: SY19-185-AMS-19-01C, prepared by Squires Young Landscape Architecture, received 9th October 2019
- BREEAM Statement, Issue one 4/5/18, prepared by MRB Energy and Sustainability
- Car Park Management Plan, dated July 2019, prepared by Vectos
- Delivery and Servicing Plan, dated July 2019, prepared by Vectos
- Desk Study Assessment Report, dated June 2018, document ref: TM/C3932/7633, prepared by Brownfield Solutions Ltd
- External Lighting Design Rev 1, received 5th August 2019
- [Lighting Locations] - Drawing no: 0688_X_GA (XX) 02_XX Rev F, received 5th August 2019
- Lighting Design, received 5th August 2019
- Lighting Details, received 20th September 2019
- Lighting Layout, Revision 4, received 9th October 2019
- Planning - Design and Access Statement- Revised scheme, prepared by Studio Anyo
- Planning Statement, dated July 2019, document ref: AKH/17/04763, prepared by Rapleys

- Response note to Natural Environment Comments, received 9th October 2019
- Sequential Site Assessment, dated July 2019, document re: AKH/JR/17-04763
- Site Specific Flood Risk Assessment & Drainage Strategy, dated June 2019, ref: IMA-17-113, prepared by IMA Transport Planning
- Sustainability Report, Rev 4 June 2019, prepared by Steve Moseley Ltd
- Topographical Survey - Drawing no: 18980-200-01T
- Townscape and Visual Impact Assessment, dated June 2018, document ref: 2824-RE-01 Rev P1, prepared by Allen Pyke, received 5th August 2019
- Tree Survey report and Tree Constraints Plan and Arboricultural Impact Assessment, dated March 2019, document ref: SY19-185-TSR-19-01. Prepared by Squires Young Landscape Architecture
- Travel Plan, dated July 2019, prepared by Vectos
- Transport Assessment, prepared by Vectos

2.6 *Community Infrastructure levy (CIL):*

In relation to the Community Infrastructure Levy, the applicant has duly completed a CIL liability form with the submission. The estimated amount of CIL chargeable from the proposed scheme would be £754,394 based on £148.24 (2019 indexed figure) per sqm of Gross Internal Area (GIA).

3. PLANNING HISTORY

172330/PREAPP - Proposal to develop a new 132-bed hotel comprising ground and 4 upper storeys with a flat roof. Superseded by the submission of application 181056 25/6/18.

Issues raised however were as follows:

- Sequential tests would be required with respect to town centre and flood risk.
- Height too dominant and exacerbated by the ground floor being higher because of flood issues.
- Needs to be less visually intrusive within the MLF and alongside the existing hotels (cumulative impact).
- It would be visible on all sides and therefore the back of house proposed at each ends requires careful consideration.
- There would be overlooking to other existing hotels.
- Materials would need to be of good quality.
- Transport and parking issues.
- Unacceptable loss of all TPO trees.
- Wildlife friendly lighting and biodiversity enhancements.
- S106 obligations would be required for Employment, Skills and Training, highways (crossing point - Richfield Avenue) and towards the public realm

181056/FUL - Redevelopment of former Crowne Plaza Hotel car park and construction of new 132-bed hotel (Use Class C1), with associated access, car parking and landscaping - Withdrawn 1st October 2018.

Issues raised, however, were as follows (email from officer to agent 12/9/18):

- Environment Agency objection that the flood risk assessment was not acceptable.
- The proposal is the same as at pre-application and officers considered that the height would be overly dominant within the Major Landscape Feature, and alongside the existing hotels (cumulative impact).
- There has been no change to the ends of the building. The officer view was that it was not an innovative design in the context of the MLF, the river, and opposite the historic Caversham Court Gardens
- Brick and vertical emphasis was considered acceptable.
- Objection from transport - southern access does is unsuitable, the proposal does not meet parking standards, insufficient info submitted to assess the transportation implications of the development and it does not comply with servicing standards.
- Loss of a TPO Plane tree is not acceptable. Substantial tree planting has been proposed, which in principle would address the issue of tree loss and screening.
- S106 obligations would be required for Employment, Skills and Training, highways (crossing point - Richfield Avenue) and towards the public realm.

Further pre-application discussions took place during early 2019 and matters of design, flooding, transport modelling, revised landscaping scheme were discussed.

In terms of the Existing Crowne Plaza Hotel the relevant history is as follows:

85/TP/873 - Hotel complex, rowing club, leisure centre site - Approved 10/1/1986

86/TP/174 - Hotel complex, rowing club, leisure centre site - Approved 10/4/1986

86/TP/1175 - Erection of single storey building to provide a restaurant with associated café and bar facilities, car parking, loading facilities, access and landscaping on land at Richfield Avenue, Caversham, Reading - refused 12/2/1987

89/00498/FUL (890310) - Extension to existing banqueting suite. Approved 14/6/1989.

04/00631/FUL (040940) - Ground floor extensions to hotel to provide an extended office area, a new lobby entrance, a new indoor swimming pool and changing facilities, a new restaurant and meeting rooms. Conversion of existing public house to provide additional conference and meeting room facilities and conversion of existing meeting rooms to provide seven additional bedrooms. Approved 20/12/2004.

05/00033/FUL (050500) - Installation of perimeter fencing and security lighting to existing hotel car park. Approved 21/3/2005.

05/002457/FUL (050275) - Installation of air-conditioning condenser units. Approved 12/5/2005.

05/00683/FUL (050277) - New access ramp, entrance doors and minor extensions to front of existing hotel. Approved 22/08/2005.

05/01265/FUL (050864) - Conversion of existing roof space/plant rooms to form 10 new guest bedrooms. Approved 11/1/2006.

05/91266/FUL (050121) - Infill existing steps and replace existing handrails and paving to external terraces. Approved 11/1/2006.

09/00054/FUL (090329) - Erection of T shaped pontoon at the river side of the Crowne Plaza Hotel and change of use of land for the permanent mooring of the vessel, Windrush, for guest accommodation ancillary to the use of the hotel. Approved 6/5/2009.

4. CONSULTATIONS

4.1 Statutory

Environment Agency

No objection subject to conditions, without which they would object due to the proposal's adverse impact on the environment. Their recommended conditions are: submission of a remediation strategy for ground contamination; the submission and approval of a verification report demonstrating the completion of the approved remediation strategy; no drainage systems for the infiltration of surface water are to be permitted; and no piling using penetrative methods shall be carried out other than with the written consent of the LPA.

Advice to Local Planning Authority

The proposed development falls within Flood Zone 2, which is land defined in the [planning practice guidance](#) as being at risk of flooding. We have produced a series of standard comments for local planning authorities and planning applicants to refer to on 'lower risk' development proposals. These comments replace direct case-by-case consultation with us. Your proposal falls within this category.

These standard comments are known as Flood Risk Standing Advice (FRSA). They can be viewed at <https://www.gov.uk/guidance/flood-risk-assessment-for-planningapplications#when-to-follow-standing-advice>.

We recommend that you view our standing advice in full before submitting the required information as part of your planning application. The local planning authority will then determine whether flood risk has been considered in line with FRSA recommendations.

Other matters

It is not within our remit to comment on landfill gas issues with respect to human health or explosion risk. The Environmental Health Department at the Local Authority will comment on these risks.

Advice to Applicant

All sewage or trade effluent should be discharged to the foul sewer if available subject to the approval of Thames Water Utilities or its sewerage agent.

4.2 Non-statutory

Berkshire Archaeology

Berkshire Archaeology advised on a similar application for this site (Planning Application 181056) and we re-iterate our previous advice as follows.

There are archaeological implications from this proposed development. Although there are no known heritage assets within the application site, it lies within an area of archaeological potential by virtue of its location on the floodplain of the River Thames within the archaeologically-rich Middle Thames Valley. This is exemplified by large scale excavations in the 1980s at Thames Valley Park, which recorded a Mesolithic (8,000 - 6,000 BC) flint scatter, a Late Neolithic (3,000 - 2,500 BC) pit, an Early Bronze Age (2,000 BC) inhumation burial and a Middle Iron Age (500 - 200 BC) settlement enclosure, which was occupied into the Roman period. Indications of the archaeological potential of the application site are provided by the discovery of a small hoard of Early Roman coins on the south side of the River Thames, when Caversham Bridge was constructed in 1926, and Bronze Age and Roman axe heads, dredged from the River Thames, just north of the site.

Although this is a modest site in terms of area, there are no indications it has previously been developed beyond superficial hard standings. Previous suggestions of former gravel workings followed by landfill are not evidenced by the site investigations report (Brownfield Solutions Ltd, June 2018) submitted with this application.

On this basis, the site has an archaeological potential and investigation would be appropriate but can be undertaken post-consent and secured by a suitably worded condition. This is in accordance with Paragraph 141 of the NPPF which states that local planning authorities should *'require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible'*. A condition requiring the implementation of a programme of archaeological field evaluation in accordance with a written scheme of investigation prior to development taking place is recommended as the site lies in an area of archaeological potential.

It would be appropriate for the programme of archaeological work to commence with exploratory field evaluation, which will establish if there are any areas of archaeological interest that require further investigation either prior to or during development and which will be subject to a mitigation strategy for agreement with the local planning authority setting out the details of the further investigation. If no areas of archaeological interest are identified, no further investigation will be sought.

Conservation Consultant

Comments to follow in an update report.

Ecology

The application site comprises a car park associated with Crowne Plaza where it is proposed to build a 132 bed-hotel with associated access, car parking and landscaping. The site comprises hardstanding area with scattered trees and is neighboured by a grassland field to the west, the Crowne Plaza hotel to the east, and the Reading Rowing Club bordering the River Thames to the north. A similar application (181056) was submitted previously and our response remains unchanged.

Considering the type of habitats present on the site, it is unlikely that the site is of great significance to any protected species. However, a number of trees are to be felled as results of the works, as such, to ensure that the risk to protected wildlife remains minimal, any vegetation removal should be undertaken outside of the bird nesting season. This should be conditioned to ensure that no birds are disturb or harm during the development - wording is given below.

In addition, considering the site's connection to valuable wildlife habitat and in accordance with paragraph 175 of the NPPF which states that "opportunities to incorporate biodiversity in and around developments should be encouraged" a condition should be set to ensure that enhancements for wildlife (to include bird and bat boxes

and wildlife-friendly planting) are provided within the new development. Wording is given below.

No objections subject to conditions - trees where birds may nest to be cleared outside the bird nesting season; details of biodiversity enhancements to be submitted and approved.

Environmental Protection & Nuisance

Noise generating development

Applications which include noise generating plant (air conditioning, air handling plant, kitchen extraction) when there are nearby noise sensitive receptors should be accompanied by an acoustic assessment carried out in accordance with BS4142:2014 methodology.

A noise assessment has not been submitted with the application and therefore I cannot determine the likely noise impact of the proposal and whether the proposals are acceptable. As the plant is proposed to be inside a plant room, it should be acceptable to deal with this matter via condition (noise assessment to be submitted).

Kitchen Extraction - odour

In addition to concerns about noise (as discussed above), cooking odour is often a significant problem in commercial kitchens and therefore the applicants must provide an assessment of the likelihood of odours based on the proposed cuisine and a statement of how the proposals will ensure that odour nuisance will be prevented. Reference must be made to the Defra Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems (January 2005).

A condition could be attached to consent, however it is possible that the criteria cannot be met with the plant specifications proposed in this application and a new application may need to be made at a later date for alternative plant / location.

Air Quality - Increased emissions

Reading has declared a significant area of the borough as an Air Quality Management Area (AQMA) for the exceedance of both the hourly and annual mean objectives for nitrogen dioxide. In addition to this recent epidemiologic studies have shown that there is no safe level for the exposure to particulate matter PM10.

The proposed development (likely to generate traffic) is located within or adjacent to an air quality management area and has the potential to increase emissions. An assessment and/or mitigation measures should be provided as part of the application.

Mitigation against increased emissions:

- Travel Plans - a travel plan is a set of measures aimed at reducing single occupancy car use, it is important that the effectiveness of the plan is considered

- Mitigation through design, improved air flow around development, alternative plant
- Parking - consider reducing number of parking spaces, graduated permit schemes based on euro standards, allocated parking for car clubs / low emission vehicles
- Provision of electric charging bays or low emission fuelling points
- Development / promotion of car clubs
- Provision of cycling facilities / residents cycles
- Improvements to local public transport

It may be appropriate in some circumstances for the developer to fund mitigating measures elsewhere to offset any increase in local pollutant emissions as a consequence of the proposed development. This may be achieved through the use of a s.106 agreement, which may in some circumstances involve the direct funding of a specific scheme or measure, however, it is likely that in most cases to be in the form of a contribution to the costs of the monitoring network and / or air quality action plan.

Reading Borough Council's Air Quality Policy DM19 requires that developments have regard to the need to improve air quality and reduce the effects of poor air quality through design, mitigation and where required planning obligations to be used to help improve local air quality.

An air quality action plan has been implemented to try and reduce levels of NO₂ in this area. The proposed developed will lead to a significant increase in vehicle movements directly conflicting with the RBC air quality action plan.

It is therefore necessary for the applicant to demonstrate through an air quality assessment and/or mitigation plan how it intends to reduce the impact of the proposed development.

Until an assessment and / or mitigation plan has been submitted and approved by the Environmental Protection Team it is impossible to determine whether the proposed development is appropriate for the proposed location, therefore until the above has been received I would recommend **refusal** on air quality grounds.

Contaminated Land

Where development is proposed, the developer is responsible for ensuring that development is safe and suitable for use for the intended purpose or can be made so by remedial action.

The development lies on the site of an historic landfill site which has the potential to have caused contaminated land and which we know generates landfill gas, and the proposed development is a sensitive land use.

The 'phase 1' desk study submitted identifies that a phase 2 site investigation is necessary including ground gas monitoring and risk assessment.

Investigation must be carried out by a suitably qualified person to ensure that the site is suitable for the proposed use or can be made so by remedial action.

Recommended conditions are required to ensure that future occupants are not put at undue risk from contamination.

It should be noted that there is a potential for significant ground gas risk at this site therefore ideally the ground gas monitoring and risk assessment would be carried out prior to permission being given in case the risk from ground gas requires the development to be significantly altered from the plans submitted, or even concludes that the site is not suitable for development.

Recommended conditions - contamination site characterisation; submission of a remediation scheme; implementation of a remediation scheme; and reported of unexpected contamination. For land gas - site investigation; remediation scheme to be submitted; and remediation scheme to be implemented.

Construction and demolition phases

We have concerns about potential noise, dust and bonfires associated with the construction (and demolition) of the proposed development and possible adverse impact on nearby residents (and businesses).

Fires during construction and demolition can impact on air quality and cause harm to residential amenity. Burning of waste on site could be considered to be harmful to the aims of environmental sustainability.

Recommended conditions - Control of Noise and Dust - CMS to be submitted; Hours of Working - construction and demolition phase; no bonfires.

Bin storage - rats

There is a widespread problem in Reading with rats as the rats are being encouraged by poor waste storage which provides them with a food source. Where developments involve shared bin storage areas - flats and hotels - there is a greater risk of rats being able to access the waste due to holes being chewed in the base of the large wheelie bins or due to occupants or passers not putting waste inside bins, or bins being overfilled. It is therefore important for the bin store to be vermin proof to prevent rats accessing the waste. Recommended condition - Details of bin stores to be submitted and approved.

Planning Officer note: Following the submission of an Air Quality Assessment EP&N confirmed that the assessment showed a very

slight worsening of air quality at receptors and that the development would not cause air quality to be over the objective levels, therefore no mitigation could be requested.

Leisure

There is just as much need for people staying at hotels to make use of parks and open spaces - whether it is to go for a stroll, jog, kick a football or just to sit and relax. It all puts pressure on existing facilities.

The proposed development is adjacent to Thames Promenade. It is also opposite Caversham Court Gardens. Both these areas are likely to be visited by the occupants of the hotel along with Christchurch Meadows which is also within close proximity to the development.

Before the introduction of CIL payments we had an agreed formula with planners to calculate S106 leisure contributions. Allowing for breaks in occupancy (say 75% occupancy) and for the fact that not all guests will use the parks/gardens (say half of them will), the formula was as follows: $.75\% \times .50\% \times \text{£}2,100 = \text{£}787.50$ per room. In this instance, accepting that CIL payments will be liable, we would also be looking to secure a S106 leisure contribution to infrastructure improvements within the vicinity of the development. If the formula above was used this would equate to £103,950. However, we would be requesting £50,000 which we believe is fairly and reasonably related in scale and kind and necessary to make the development acceptable in planning terms. It is also directly related to the development.”

It is clear that the new guests of the hotel will make use of our nearby facilities and so investment must be made to extend/enhance those facilities close to the development site to cater for the increased strain/usage arising from this development. This is not a simple case that CIL funding can be used for this purpose as it becomes diluted to fund a number of Council priorities. It is as a matter of direct compensation to mitigate the impact of the development on our facilities and to make the application acceptable in planning terms. All new developments, be it residential, retail, office or hotel must play a part in contributing to the proper planning of the area.

Planning Officer note: the agent queried the requirement for leisure contributes as part of any S106 agreement. Further information was provided by the Officer in an email dated 4th October 2019. No further response was received on this matter. Details are included in the S106 section below.

Natural Environment

As you will be aware, planning discussions on the proposal for a hotel have been ongoing over the last 2-3 years.

As is indicated in submissions, the site is subject to Tree Preservation Order 118/09 which includes 11 Alder trees within the car park itself as well as additional Plane trees adjacent to the Highway. The site is within an area of less than 10% tree canopy cover and is on a route identified in Reading's Tree Strategy as being important for tree planting and retention hence there need to be appropriate planting to both mitigate any tree loss and provide a net gain in tree number.

In addition, as the proposed hotel will be visible from Thames Promenade (a Major Landscape Feature and Important Area of Open Space), we need to ensure that appropriate soft landscaping to screen the hotel is provided to avoid a detrimental impact from Thames Prom and that the design is appropriate to the setting.

With reference to:

- Tree Survey, Tree Constraints Plan and Arboricultural Impact Assessment document dated March 2019
- Arboricultural Method Statement dated June 2019
- Landscape Planting Plan SY19-185-LPP-19-01 dated 15.6.19
- Landscape Planting Strategy dated March 2019
- Site Plan Rev F
- Site Plan Rev F showing lighting locations

As is confirmed within the AIA, the proposal will result in the loss of all 11 TPO Alder trees. However, given their condition and level of tree planting proposed, their removal would be acceptable, providing that replacement/enhancement is provided in the redevelopment.

It is confirmed that a total of 15 trees are to be felled and 31 new trees planted resulting in a net gain of 16 trees, which is in accordance with the aims of our Tree Strategy to increase canopy cover.

The landscaping is generally acceptable and the landscaper should be commended in including elements not regularly seen, e.g. biodegradable tree ties, use of tree suppliers with appropriate biosecurity rules and incorporation of Biochar in the tree pits. There are just a few queries which I think can be easily remedied either prior to a decision to avoid pre-commencement conditions or could be secured via condition.

The proposed new species are acceptable and have evolved over discussions with the applicant/landscaper. I would suggest that the applicant/landscaper confirm the soil type in relation to the Pin Oak as it is unlikely to survive if the soil is alkaline. I would also comment that the Taxodium was chosen for its good autumn colour and consistency with tree planting in Thames Prom rather than to 'improve biodiversity' as is indicated in the Landscape Planting Strategy.

I note from the Planting Strategy that the Ilex hedge is to be maintained at 1m high. Confirmation of maintenance height for the Prunus hedge is required which should be at a height useful for screening the car park but to avoid visibility issues when exiting the car park.

I note that tree pit specifications have been included on the Landscape Planting Plan. It is necessary to review the proposed tree pits on the north side (GBU 2018) against the location of the attenuation tank as shown on the NPPF Flood Risk Assessment & Drainage Strategy Schematic Drainage Layout included at the end of the Arb Method Statement. The tree pit design appears to indicate that root cells will be incorporated under the adjacent car park spaces adjacent to the trees to provide a rooting environment. However, the attenuation tank is shown as extending right up to the edge of the car park hence conflicts with the tree pit provision. This matter needs to be resolved prior to a decision.

In relation to the tree pits on the southern side of the hotel (within the car park, GBU 2013), I note that this is indicated as a continuous trench pit which is very positive. To confirm this, I would ask that the extent of the root cell area be shown on the Planting Plan. I have concerns, however, that lighting will conflict with this - see comment below.

In relation to the other trees, it would be prudent to identify those trees adjacent to hard surfaces and/or services and for an appropriate root barrier to be specified in the tree pits (for soft areas) and the position of barrier locations shown on the Planting Plan.

In relation to the maintenance notes, there is one point that requires amendment. Currently it is stated that: *'Plant failures On each visit note should be taken of any dead or missing plants and these replaced before the end of the five year period'*. This should be amended to: *'Plant failures On each visit note should be taken of any dead or missing plants and these replaced in the next planting season'*.

The Arboricultural Method Statement is unfortunately not sufficient to be an approved document. There are elements missing that were included in the Arb Impact Assessment but not carried into the AMS, e.g. arb supervision and a tree protection plan. In addition, the AMS should include a specification for all ground works within RPAs and clearly state the depth of cellular confinement system to be used. The AMS could be secured by condition if there is inadequate time to amend this.

With reference to the lighting locations shown, these appear to have little regard for new trees on the north boundary or within the car park south of the hotel; lights (which I assume are lighting columns)

being proposed in the same location as new trees in several places. Lighting locations should be midway between trees to minimise future conflict. As indicated above, the tree pits for the car park trees south of the hotel are indicating as being a continuous trench pit. Therefore, confirmation that the electricity cable route for lighting is mutually inclusive is required, i.e. that the electricity cables will be fed through the tree pits and that easy, future access is possible along with confirmation of how the lighting column bases will be incorporated within the tree pit.

The location of all service routes will need to be submitted for approval, which could be secured by condition (with the exception of the drainage layout) and should obviously avoid RPAs of retained trees and locations of new trees.

In conclusion, I have no objections to the principle of the development, however there are a number of issues to address, as detailed above.

Planning Officer note: Further information was provided during the course of the application, i.e. amended Landscape Strategy, Planting Plan, AMS and lighting details, which addressed the majority of issues. Following officer advice to the agent that the application would be recommended for refusal they were advised by their client to do no more work on the project at this time.

SUDS

The proposed SuDs details comply with National Guidance and therefore are deemed acceptable in principle. The applicant would however need to get approval by the LLFA to connect into the Reading Borough drainage system located to the south of the application site. Full details would however need to be dealt with by way of a condition.

Transport

The development proposes to construct a new 132 bed hotel with associated car parking. The footprint of the new hotel will remove a portion of the existing car parking and the remaining car parking on-site will be shared amongst guests of the proposed hotel, the existing Crowne Plaza hotel and restaurant / health club users at the Crowne Plaza.

This proposal has been the subject of a previous planning application 181056 which was withdrawn.

The hotel will provide some on-site facilities for the use of hotel guests including a meeting room, breakfast room and fitness room. The proposed hotel will not provide any ancillary facilities to non-guests.

It is firstly noted that the redline plan only includes that area of the application site itself, however the implications of the development include the Crown Plaza Hotel as it reduces the parking provision for that use and determines how it will operate in the future. The red line should therefore be extended to include the wider site.

A Transport Statement has been submitted to accompany the application and I comment on this as follows:

Access

Access to the site is to be gained from the priority junction on Richfield Avenue to which in principle is acceptable given the proposed reduction in car parking.

The TS states at paragraph 2.13 that ‘it is generally accepted that there is significant potential for walking to replace the car for short journeys, particularly those under 2km’ however IHT document Providing for Journeys on Foot stipulates the following as acceptable walking distances:

	Town Centres	Commuting / School / Sight Seeing	Elsewhere
Desirable	200m	500m	400m
Acceptable	400m	1000m	800m
Preferred Maximum	800m	2000m	1200m

Given that pedestrians would be walking with bags / cases and the potential destination would be the Town Centre the maximum walking distance should be 800m. Although the site would be beyond this distance bus routes are located within close proximity of the site which would allow access to within 400m of the site.

At the pre application stage it was identified that the proposal will increase the pedestrian movement to and from the application site and therefore will increase the number of pedestrians crossing at the Richfield Avenue pedestrian crossing which requires upgrading. Given that the full impacts of the development have not been assessed as I will comment on further in the next section I am unable to determine at this stage whether a contribution will be sought towards this upgrade.

Pedestrian and vehicle access to the site will be provided via Thames Side Promenade. A second vehicle / pedestrian access will replace the current southern pedestrian-only access point. Both of the vehicle access junctions will permit two-way movements (entry and exit).

The submitted plans identify the visibility splays for each and although the northern access includes a visibility splay that is

obstructed by a tree. This is an existing situation and in fact the visibility splay could be taken to the central island given the flows are split by the island which would result in a compliant visibility splay, given this the visibility splays have been deemed acceptable.

Trip Generation

The site currently comprises a private car park for the use of Crowne Plaza hotel guests and staff. Accordingly, whilst the site is not considered to generate any trips as a standalone site, it is an ancillary facility to the Crowne Plaza Hotel. The applicant has stated that for the purposes of a robust trip assessment, no trips will be associated with the existing uses on-site.

As stated at the pre-application stage it is envisaged that the proposal will reduce vehicle movements to and from the site, given that the overall parking as currently presented is reduced, however the Transport Statement should fully assess the vehicle impact including the taxi drop off / pick demand that would be generated by the development. As if the existing use is not assessed and the trip generation identifies increased trip generation then the following junctions will require assessment:

Caversham Road / Caversham Bridge / Richfield Avenue Roundabout
Caversham Bridge / Church Road / Church Street signalised junction
Caversham Road / Vastern Road roundabout

These junctions are heavily congested at the peak times and the Highway Authority cannot agree to any further vehicle movements through these junctions if they are already over capacity.

The assessment that has been undertaken of the trip generation has been undertaken using the Trip Rate Information Computer system (TRICS). TRICS is the national standard system of trip generation and analysis in the UK and Ireland, and is used as an integral and essential part of the Transport Assessment process. It is a database system, which allows its users to establish potential levels of trip generation for a wide range of development and location scenarios, and is widely used as part of the planning application process by both developer consultants and local authorities and is accepted by Inspectors as a valid way to ascertain likely trip generation. I am therefore happy that this is an acceptable approach.

However, I have reviewed the site's selected and those example sites identified as comparisons are those that were included within the initial Transport Statement for the withdrawn 2018 scheme and some of those were discounted as they included sites located within the Town Centre, Edge of Town Centre and Suburban areas. As previously stated, using sites from all 3 of these locations is contrary to the TRICS Good Practice Guide.

I previously undertook my own assessment of TRICS and provided this to the applicant which had subsequently agreed. However, given that the trip rates proposed by the applicant would generate a worst case scenario, I am happy that these can be included within the assessment. The actual number of movements that would be generated are as follows:

Table 5.2: Proposed Site Trips per Mode (Weekday)

	AM Peak (0800-0900)			PM Peak (1700-1800)		
	Arr	Dep	Tot	Arr	Dep	Tot
Total Person Trips (All Modes)	21	48	69	32	17	50
Vehicle Trips	12	24	36	17	8	25
Taxi Trips	2	2	4	2	1	3

The applicant undertook Manual Classified Count (MCC) surveys on Thursday 4th July between 07:00-10:00 and 16:00-19:00 to record turning movements and vehicle queues at the three junctions in the study network.

The total existing vehicle movements at the three junctions were counted and it was determined that the AM and PM peak hours were 07:00-08:00 and 18:00-19:00 respectively. These are not the usual peak periods but given they represent a worst case assessment for development I am happy that these periods are assessed.

Whilst the proposed development would generate more vehicle trips in the hours 08:00-09:00 and 16:00-17:00; when the development flows were added to the existing flows it was clear that the combined peak hours remained 07:00-08:00 and 18:00-19:00.

The Developer of the proposed hotel has indicated that should planning consent be granted in 2019, it is the intention that the hotel would be completed and occupied in 2021. Accordingly, 2021 has been used by the applicant as the future baseline year for traffic assessment purposes. However, the future baseline year could be just over one year from consent being granted and therefore a future base year of 2022 should be used.

The vehicle trips associated with the proposed development have been distributed based on the survey undertaken at the junction of Richfield Avenue and Thameside Promenade. The turning movements at this junction are associated with the Crowne Plaza hotel and the public car park and it is considered that the future traffic distribution at this junction will not change as a result of the proposed development.

Beyond this junction, proposed development trips have been distributed based on the observed turning proportions at each junction according to the 2019 MCC survey. This is deemed acceptable.

The assessments on each junction have been undertaken based on the above and I comment on each junction assessment as follows:

The assessment for the Vastern Road / Caversham Road roundabout has been undertaken on the basis that this is a 3 arm roundabout when it is in fact a 4 arm roundabout. The assessment must therefore be rerun to include the fourth arm of the junction.

It is noted that the 2021 assessment with committed development results in the Caversham Road / Caversham Bridge / Richfield Avenue / Waterman Place Roundabout exceeded capacity in the AM and PM peak periods and the development worsens this further. The applicant has stated that the largest percentage change / increase in either peak hour is 1.03% and as such, it is considered that the impact of the proposed development on the junction is not significant. However, given that the junction has already exceeded capacity any increase is significant as it will have a direct impact on the operation of the junction.

This is identified within the NPPG at Paragraph: 013 Reference ID: 42-013-20140306, which states:

*Local planning authorities must make a judgement as to whether a development proposal would generate significant amounts of movement on a case by case basis (ie **significance may be a lower threshold where road capacity is already stretched or a higher threshold for a development in an area of high public transport accessibility**).*

The Bridge St / Church Rd / Church St signalised Junction is approaching capacity but does not exceed it and the queue lengths are not detrimentally impacted. I am therefore happy that the assessment of this junction is acceptable.

However until the Vastern Road / Caversham Road roundabout has been acceptably assessed I am unable to determine the full impacts of the development on the surrounding Highway Network.

Car Parking

The proposed car park is to be reduced from 200 spaces to 118 which are to be shared between the two hotels. However, when reviewing the submitted plans it is noted that only 116 parking spaces have been illustrated. It is noted that additional car parking is currently located to the front of the existing Crowne Plaza Hotel and the car park management plan identifies this provision to be 22 which is to be retained for the use of the existing hotel. However, if this parking is to be retained then drawings should be submitted to identify this parking especially as it has been referred to within the TA.

The site is situated within Zone 2 of RBC's zonal car Parking Standards and Design SPD which relates to a maximum car parking standard of 0.5 spaces per bedroom. When both hotels are considered as a single entity, the maximum number of car parking spaces which can be provided is 127 spaces for the hotels. The proposed parking provision indicates 118 spaces which would fall short of this provision.

A car parking occupancy survey was undertaken between Thursday 13th to Saturday 15th September 2018 at the Crowne Plaza Private Car Park west of Thameside Promenade and the Crowne Plaza Private Car Park east of Thameside Promenade. In summary, the results of this survey concluded that the existing demand for car parking in the Crowne Plaza hotel main car park has a peak occupancy of 101 car parking spaces (60%) on a Saturday at 16:00 with an overnight occupancy of 71 spaces (43%).

This existing demand for parking is also in excess of the proposed provision and also makes no reference as to whether a conference / meeting / wedding etc. was being held at the facility and if so what capacity the event held. If no such event was being hosted then the survey would not represent a worst case scenario and additional car parking would have been utilised.

As well as the facilities mentioned above the existing Crowne Plaza Hotel also provides ancillary uses including restaurant, gym, spa, etc. which are available to the general public and as a result the parking demand for these uses should be assessed. In relation to the health club and restaurant car uses the Council's Parking Standards and Design SPD would recommend the maximum standards:

- A3 restaurant 1 parking space per 7.5 sqm
- D2 health 1 space per 35 sqm.

Although the parking provision for each of the above uses has been identified a detailed assessment has not been undertaken. The applicant has stipulated that 20 car parking spaces are to be shared between the above land uses and they will be signed for the use of Health Club members and Restaurant users only.

In principle I am happy to accept a flexible approach to parking demand but before this can be agreed in this case a thorough assessment must be undertaken to establish that sufficient parking is provided and that the land uses peak demands do not conflict. This could be undertaken by provided TRICS data for comparable sites and resultant car park accumulation data. The assessment to date is just an assumption and therefore cannot be accepted.

Also, as stated during the pre-application for the 2018 application, the actual 2018 application and the informal pre-application discussions for this application the assessment should include the existing provision of meetings, conferences and weddings etc. but as

part of this application no reference is made as to how much parking would be provided for this use. The Council's Parking Standards and Design SPD states that the 'ancillary facilities such as restaurants, bars and conference areas will be treated as A3/ D2 uses when available to non-residents, the site is currently provided with a parking provision that would accommodate these uses and is now being removed without any assessment. Given the types of events that could be held at the site a provision of parking must be retained and dedicated for this use.

A Car Park Management Plan has also been submitted to accompany the planning application and this states at Paragraph 2.7 that 'no opportunities exist nearby for on-street overnight parking without a resident's permit', however parking is unrestricted on the northern side of Caversham Road between 6pm and 7am and on the southern side is permitted between 4.30pm and 9.15am. There is therefore the possibility of on street parking within close proximity of the application site.

It was also noted when assessing the sites within TRICS that those hotels that have no car parking still generate significant levels of vehicular movement and demand for parking. The site is located adjacent to a public car park that is provided for the public to use the surrounding facilities. However, given the close proximity it is highly likely that customers / visitors to the adjacent hotels will fully utilise this car park especially if an insufficient level of parking is provided on site.

As part of the September 2018 car parking survey for the application site, the Thameside Promenade Public Pay and Display Car Park was also assessed by the applicant and it was shown that the car park had a peak occupancy of 95% (62 cars parked in 65 spaces) at 11:00-12:00 on a Saturday which then reduced throughout the rest of the survey period. The overnight accumulation of the public car park was 15% (10 cars parked in 65 spaces) meaning 55 parking spaces were available.

Signage within the Thameside Promenade Public Pay and Display Car Park informs users that additional parking is available at the Rivermead Leisure Centre which is circa 400m to the west of Thameside Promenade.

A car parking occupancy survey of the Rivermead Leisure Centre Public Car Park was also undertaken by the applicant in April 2019 and took place over 48 hours. The survey identified the peak occupancy occurred at 10:15 on a Wednesday with 167 vehicles parked. The car park typically provides 515 parking spaces however during the survey, an area of parking was temporarily closed meaning 302 spaces were available. This equates to a parking occupancy of 32% when the car park has all spaces available or 55% at the time of the survey. The overnight occupancy of the car park was 0%.

Finally, the parking occupancy of Caversham Road was surveyed during the September 2018 surveys and demonstrated that the overnight demand for car parking was 45% which resulted in 12 available car parking spaces.

In summary, two car parking surveys have been undertaken of the public car parking opportunities available locally and it has been demonstrated that there is capacity available in the Thameside Promenade Public Pay and Display Car Park and / or the Rivermead Leisure Centre Public Pay and Display Car Park.

The applicant has continued to state that these car parks could accommodate any potential overspill resulting from the creation of a new hotel, assuming there is no change in the travel behaviour amongst hotel guests.

Although it is stated that the proposals do not permit staff parking on-site and the proposed management of parking on-site through pre-booking car parking will further reduce the potential for any car parking overspill locally, this is not a view shared with the Highway Authority. Reducing car parking which is clearly required as identified within the applicants assessment will lead to overspill parking which is not acceptable and does not comply with the NPPG which at Paragraph: 003 Reference ID: 42-003-20140306 states:

Travel Plans are long-term management strategies for integrating proposals for sustainable travel into the planning process. They are based on evidence of the anticipated transport impacts of development and set measures to promote and encourage sustainable travel (such as promoting walking and cycling). They should not, however, be used as an excuse for unfairly penalising drivers and cutting provision for cars in a way that is unsustainable and could have negative impacts on the surrounding streets.

It continues at Paragraph: 008 Reference ID: 42-008-20140306 to state:

While Travel Plans are intended to promote the most sustainable forms of transport, such as active travel, they should not be used to justify penalising motorists - for instance through higher parking charges, tougher enforcement or reduced parking provision (which can simply lead to more on street parking). Nor should they be used to justify aggressive traffic calming measures, such as speed humps.

Maximum parking standards can lead to poor quality development and congested streets, local planning authorities should seek to ensure parking provision is appropriate to the

needs of the development and not reduced below a level that could be considered reasonable.

Travel Plans, Transport Assessments and Statements should reflect the important role that appropriate parking facilities can play in rejuvenating local shops, high streets and town centres.

The parking assessment is contrary to the above advice and is therefore wholly unacceptable. Although the hotels will manage the parking of their own car parks they should also be providing sufficient levels to ensure overspill does not occur but the applicant is actively highlighting these parking areas as suitable alternatives which also includes on street parking.

As a result the proposal is likely to lead in an increase in on street parking in the surrounding area and therefore cannot be accepted.

The proposal includes the provision of a new access / egress into the car park from Thames Side Promenade and the existing access is to be altered creating two separate car parks the northern car park with 50 spaces (only 48 illustrated) and the southern with 68 spaces. It was requested at the pre-application stage for the 2018 withdrawn application that it should be clarified how the car park will be managed to ensure that unnecessary internal movements are avoided looking for parking between these three locations. This has not been provided with the allocation of the existing hotel being 58 and the proposed hotel provided with 63, the location of these spaces should be allocated on a revised plan and should ensure that vehicles are not required to travel between each car park searching for a space. This provision would require either the existing Crowne Plaza hotel to be spread over both of the new car parks as well as the existing car park to the frontage or the provision of both hotels being spread over two car parks, the car parks should therefore be redistributed so as to provide the correct level of parking for each hotel within each parking area.

In accordance with the emerging Local Plan communal car parks for residential or non-residential developments of at least 10 spaces should provide at least 10% of spaces with an active charging point. A revised plan should be provided illustrating the location of these charging points.

RBC cycle parking standards require a minimum provision of 1 cycle parking space per 6 staff. 6 sheltered and secure cycle parking spaces will be provided on site for guests and staff and located within the car park of the hotel. The full details of the cycle store have not been indicated but I am happy for this to be dealt with by way of a condition.

Servicing

Refuse collection and servicing will take place within the site, taking access from Thames Side Promenade. Refuse collection will be undertaken by private collection services.

The largest vehicle anticipated to make regular trips to the site is a 10m rigid delivery vehicle. The swept path analysis for a 10.0m rigid delivery vehicle and Refuse Vehicle has been referred to by the applicant within the TA but no tracking drawings have been submitted to accompany the application. I am therefore unable to identify whether the servicing arrangements are acceptable.

I have also reviewed the submitted Servicing Management Plan and this identifies the following typical servicing arrangements for the proposed hotel:

Table 3.1: Typical Daily Servicing Arrangements

Delivery	Frequency	Vehicle	Dwell Time
Linen Deliveries	6 deliveries / collections per week	Largest vehicle to be used would be a 7.5t Rigid	Typically less than 20 minutes
Consumables (Food / Housekeeping Supplies)	2 deliveries per week	Typically delivered by a Transit-style van or a Rigid vehicle of circa 8.5m	Typically less than 30 minutes
Refuse Collection	2 collections per week	Local Authority Vehicle (9.86m long)	Typically 5 minutes

On several occasions during the week car parking spaces will be inaccessible and the proposed one-way system through the car park will be obstructed as a result of a waiting delivery / servicing vehicle. I refer to my pre-application comments and those on the 2018 withdrawn scheme that stated that *'dedicated servicing is required for the proposed hotel given that the servicing area for the existing Crowne Plaza Hotel is located directly adjacent to the hotel on the opposite side of the Thames Side Promenade to that of this development'*. This is also highlighted at Paragraph 1.7 of the submitted TS.

Dedicated servicing has not been provided which will impact on the effectiveness of the proposed car park causing potential conflict between vehicles and pedestrians.

As a result of the incomplete assessment undertaken I object to the proposed development on the following grounds.

Reasons for Refusal

The layout does not comply with the Local Planning Authority's standards in respect of vehicle parking. This could result in on-street parking/reversing movements on Caversham Road, adversely

affecting road safety and the flow of traffic, and in conflict with Core Strategy Policy CS24 and Sites and Detailed Policies document Policy DM12.

Insufficient information has been submitted with the planning application to enable the highways, traffic and transportation implications of the proposed development to be fully assessed. From the information submitted, it is considered that the additional traffic likely to be generated by the proposal would adversely affect the safety and flow of users of the existing road network within Reading, contrary to Policies CS4, CS20 and CS22 of the Adopted Reading Core Strategy and Sites and Detailed Policies document Policy DM12.

The proposed development does not comply with the Local Planning Authority's standards in respect of servicing and, as a result, is in conflict with Sites and Detailed Policies Document Policy DM12.

4.3 Public

81 no. addresses were consulted, i.e. those who commented on the withdrawn application 181056.

Also Premier Inn, Toby Inn, and the Reading Rowing Club were consulted.

A site notice was displayed. 50 no. objections and 1 no. support were received and issues raised in objections are summarised as follows:

- Detrimental effect on parking, especially the public car park used by the Rowing Club, walkers, etc.
- Insufficient parking to serve the development and existing hotel.
- Additional hotel bedrooms not needed.
- Increased congestion in the area.
- Design is ugly and would detract from the beautiful riverside setting.
- It would have a negative visual impact.
- Would increase flood risk.
- Overdevelopment of the site.
- Increased pollution.
- New developments should be self-sufficient in terms of energy.
- Would detract from character and important views.
- The proposed building is overbearing in the context of the Thames Promenade and the Rivermead open space. It would be the tallest in Richfield Avenue and would set a bad precedent for taller buildings in a low-rise area.
- The design is incongruous with existing buildings in the area.

The supporter regards the application as an excellent opportunity for development to bring much needed revenue to the Town.

Caversham And District Residents' Association (CADRA)

CADRA previously objected to application 181056 on the same site, on grounds relating to the visual impact of a building of this bulk in this location and its effect on parking and air pollution. This previous objection is attached for reference and I have also posted the following comments to the Council's Planning Website.

The present application 191088 slightly reduces the height of the building and adjusts its location, but these changes do not ameliorate our previous concerns, which focussed on the principle of an hotel of this size in this location rather than its detail. We therefore reiterate our previous objection, for the same reasons: overall height; dominance in the local landscape, especially in views from Caversham Bridge, the Thames Promenade and the recently extended Conservation Area; traffic impact; the risk of parking congestion; and pollution arising from additional traffic.

Notwithstanding those fundamental objections, we recognise the slight reduction in overall height and the simplification of rooftop plant, but suggest careful checking of the lift overrun structure: the Design & Access Statement says this will be 850mm above the predominant roof height but the elevational drawings show the roof height at 16.1m FFL and the lift overrun at 18.1 FFL, a 2m difference. We also feel that the new elevations feel contrived, especially through the addition of a mansard roof and, contrary to the applicants' statement, they do not improve the proposals.

Our key concern is the impact on views from the recently extended Conservation Area, which are referred to in the Townscape and Visual Impact Assessment by Allen Pyke which accompanies the application Para 3.7 quotes the St Peter's Conservation Area Statement as saying that 'Only the churchyard and Caversham Court Gardens have significant views out of the area' and continues by quoting its comments on the attractiveness of the riverside walk, the poor quality of recent building alongside it, and the need for tree planting to ameliorate these. Para 3.20 quotes further from the Conservation Area Statement, while Para 3.9 quotes Local Plan Policy EN2 (Protection of Significant Views of Heritage Interest), which asserts that the view upstream from Caversham Bridge merits special protection.

Para 3.46, in discussing the impact on views from Caversham Court Gardens and the Church, concludes: "Value of the view: High. The view is of good scenic value, from the Conservation Area across the Major Landscape Feature " (i.e. the river).

We feel this Assessment reflects the importance of these views. However, its conclusions are not carried forward to the Design and Access Statement. Page 9 of that Statement contrasts sharply, stating that "*the Conservation Area Appraisal indicates that the development... would have no impact on views into the Conservation*

Area, with the only potential views toward the site provided from Caversham Court Gardens and Caversham Bridge”.

This summary is not only at odds with the applicants’ own Assessment but with the Conservation Area Appraisal’s meaning. As CADRA drafted the Appraisal on behalf of the CAAC and the Borough Council, we feel equipped to interpret it. The Assessment’s quoting of the word ‘only’ to imply unimportance is a calculated misinterpretation: in fact the views across the river from these vantage points (and from the Churchyard, which is not mentioned on P 9) are by far the most important in the Conservation Area, were a key factor in its designation, and are reflected in Policy EN2. The proposals would particularly impact on these views in winter, as the trees around the site are deciduous.

5. RELEVANT PLANNING POLICY AND GUIDANCE

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy Framework (NPPF) (2019) which states at Paragraph 11 “Plans and decisions should apply a presumption in favour of sustainable development”.

5.2 The Development Plan is now in one document - the Reading Borough Local Plan (November 2019) (RBLP). The relevant policies are:

Policy CC1: Presumption in Favour of Sustainable Development
Policy CC2: Sustainable Design and Construction
Policy CC3: Adaptation to Climate Change
Policy CC4: Decentralised Energy
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 CC9: Securing Infrastructure
Policy EN1: Protection and Enhancement of the Historic Environment
Policy EN2: Areas of Archaeological Significance
Policy EN5: Protection of Significant Views with Heritage Interest
Policy EN7: Local Green Space and Public Open Space
Policy EN11: Waterspaces
Policy EN12: Biodiversity and the Green Network
Policy EN13: Major Landscape Features and Areas of Outstanding Natural Beauty
Policy EN14: Trees, Hedges and Woodland
Policy EN15: Air Quality
Policy EN16: Pollution and Water Resources
Policy EN17: Noise Generating Equipment
Policy EN18: Flooding and Drainage
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
Policy RL2: Scale and Location of Retail, Leisure and Culture Development
Policy RL5: Impact of Main Town Centre Uses
Policy CR4: Leisure, Culture and Tourism in Central Reading

- 5.3 Relevant Supplementary Planning Documents (SPD) are:
- Sustainable Design and Construction (April 2011)
 - Revised Parking Standards and Design (October 2011)
 - Planning Obligations Under Section 106 (April 2015)
 - Employment, Skills and Training (April 2013)
- 5.4 Other relevant documents are:
- National Design Guide: Planning practice guidance for beautiful, enduring and successful places (Oct, 2019)
 - NPPG: Flood Risk and Coastal Change (March 2014); Town Centres and Retail (July 2019)

6. APPRAISAL

The main matters to be considered are:

- Principle of development
- Design considerations and the effect on the Major Landscape Feature
- Transport
- Landscaping
- Sustainability
- Environmental Matters - Air Quality, Flood Risk, Contamination
- S106
- Equalities impact

Principle of Development

- 6.1 The application site is not allocated for the proposed use and to determine whether the principle of use is acceptable requires assessment as to whether the site is sequentially preferable (i) in terms of the proposal for a main centre use located outside of the defined town centre; and (ii) in terms of flood risk.

Relationship to town centre

- 6.2 In terms of town centres, Section 7 of the NPPF: Ensuring the Vitality of Town Centres, states that “*Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation*” (para 85). It goes on to state that:

86. Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

87. When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre¹ sites are fully explored.

- 6.3 The RBLP includes Policy RL2: Scale and Location of Retail, Leisure and Culture. This reiterates the requirements of national policy requiring main town centre retail, leisure and culture over 2,500sqm (net gain) to take place in the centre of Reading. *“Where a need for additional development has been identified, and no sites are available in or adjoin the centre of Reading or other defined centres, a sequential approach should be adopted to identifying alternative sites.”*
- 6.4 Policy RL5: Impact of Main Town Centre Uses confirms that proposals for more than 1000sqm (gross) of new or additional floorspace for main town centre uses in an edge-of-centre or out-of-centre location should demonstrate that there will be no significant adverse impact on existing centres.
- 6.5 The proposal is outside the town centre and beyond what is defined as ‘edge of centre’ under the NPPF. Therefore, it needs to be demonstrated that the application site is sequentially preferable to those within the town centre, and that the proposed site is an accessible location, well connected to the town centre (NPPF, 2019 - Para 85 (e)).
- 6.6 The applicant has submitted a Sequential Site Assessment and this includes consideration of the potential suitability, viability and availability of potential alternative sequentially preferable sites, to accommodate the proposed hotel development.
- 6.7 The submitted Assessment identifies the scope of the assessment (set out in a pre-application email to the Council on 29/3/2018 and agreed) as follows:

Area of search - The applicant has identified market demand for a hotel in the north of Reading’s central area. Accordingly, the

¹ Defined in Annex 2 of the NPPF as within 300m of a town centre boundary (excluding retail). The application site is ca550m from the town centre boundary measured along Caversham Road.

catchment area is location-specific to Reading's central area and the site must be in a short distance of the central core to enable hotel visitors to utilise the town centre for leisure and work purposes. Therefore, the search for alternative sites will concentrate on sequentially preferable sites within and on the edge of Reading town centre.

Flexibility - The proposed scheme comprises a five-storey hotel with 132 hotel rooms and is considered appropriate to serve market demand in this location. The number of rooms is not flexible in this instance in the context of the applicant's commercial requirements; however, having regard to flexibility, it would be possible in theory to vary the size of the site needed to accommodate this scale of development depending on the number of storeys the site could feasibly accommodate.

Site parameters - Any potential site must also be of an adequate size to accommodate the proposed hotel with dedicated parking provision in accordance with the Council's maximum standards, along with a visual presence from a main road. Reading has different maximum parking standards for zone 1 and zone 2 owing to the availability of transport links in the central area and the need to discourage on site parking. On this basis, the minimum site area used for the purposes of the assessment having regard to flexibility is calculated to be 0.2 ha (0.5 acres) in parking zone 1 and 0.3 ha (0.7 acres) in parking zone 2.

- 6.8 In summary the following parameters were agreed with the Council
- A location within, or on the edge of, Reading central area;
 - A minimum site area of 0.2 ha in parking zone 1 and 0.3 ha in parking zone 2;
 - Prominent roadside location; and
 - A topographically flat site.
- 6.9 Six sites were assessed, including No. 1 Reading, 29 Station Road (Ref: 181930) as requested by the case officer as part of a pre-application meeting in February 2019. 20 Hosier Street (ref: 182054) was also identified, but was discounted by the applicant as being too small within the above agreed parameters.
- 6.10 Paragraph 11 of the NPPG - Town Centres and Retail (July 2019) includes a checklist of considerations that should be taken into account in determining whether a proposal complies with the sequential test (*bold emphasis by Case Officer*):
- *With due regard to the requirement to demonstrate **flexibility**, has the **suitability** of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to **accessible** sites that are well connected to the town*

centre. It is important to set out any associated reasoning clearly.

- *Is there scope for **flexibility** in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.*
- *If there are no suitable sequentially preferable locations, the sequential test is passed.*

6.11 Paragraph 12 highlights that *“Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification will need to be provided where this is the case, and land ownership does not provide such a justification.”* And Paragraph 13 that *“..as promoting new development on town centre locations can be more expensive and complicated than building elsewhere, local planning authorities need to be realistic and flexible in applying the test.”*

6.12 The applicant’s submitted Assessment identifies that the applicant’s construction methods, i.e. a modular construction method whereby hotel rooms are built and furnished off-site and assembled on-site has been included as a relevant consideration as part of the application of the sequential assessment. This, it is stated, is because this construction method is integral to the viability of the business model and informs the number of rooms that the market can support in a particular location. This is identified as the reason why conversion of an existing building or the demolition of a building is not viable, and only vacant or low intensively used land could be used for the proposed development.

6.13 In terms of deliverability, the Assessment has focussed on sites available on a freehold basis for purchase by the applicant and available for development within the next 6 months.

6.14 Based on the above identified criteria the following sites were assessed as to whether they were available, suitable and viable:

- Abattoirs Road
- Hills Meadow Car Park, George Street
- Site allocation - Reading Prison
- Site allocation - North of Station
- Site allocation - Hosier Street; and
- No.1 Reading, 29 Station Road

6.15 Having reviewed the Assessment, Officers consider that it has been undertaken to a reasonable standard and complies with the requirements of national and local policy. It demonstrates that each of the sites assessed would not be sequentially preferable when

assessed in the context of the agreed criteria as set out above, for reasons relating to availability, size, configuration and or location (suitability), and viability. The application site is considered to be accessible and well connected to the town centre, and therefore Officers are satisfied that the town centre sequential test has been passed.

Flooding

- 6.16 The application site is located in Flood Risk Zone 2 - Medium Probability of flooding, and national policy, as defined in NPPF in section 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change, states that *“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”*
- 6.17 A Sequential Test is to be applied to steer new development to areas with the lowest risk of flooding. If there are **reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding then the proposed development should not be permitted.**
- 6.18 The NPPG on Flood Risk and Coastal Change provides further detail on the Sequential Test. Paragraph 33 requires the area to which to apply the Sequential Test should be defined by local circumstances and relate to the catchment for the type of development proposed. Also when applying the Sequential Test the guidance states that *“... a pragmatic approach on the availability of alternatives should be taken.”*
- 6.19 It is for the Local Planning Authority to decide on whether the Sequential Test has been passed and needs to be satisfied that proposed development would be safe and would not lead to increased flooding elsewhere.
- 6.20 The submitted Flood Risk Assessment (FRA) identifies that a search for sites has been undertaken across the whole of Reading Borough area. In selecting reasonably comparable sites the applicant has used sites identified within their town centre retail sequential test, those within the Council’s Level 2 Strategic Flood Risk Assessment (attracting a lower or similar flood risk). The applicant also searched land use marketing search engines and further reviewed sites which would meet former Reading Central Area Policy RC7: Leisure, Culture and Tourism in the Centre, and Sites and Detailed Policies Document Policy SA10: Other Sites for Leisure Development. These returned no other identified or comparable sites.
- 6.21 The submitted Sequential Test identifies that there are no sequentially preferable sites and officers consider that the

assessment has been undertaken in accordance with national policy and guidance requirements.

- 6.22 With respect to the flood risk and town centre/leisure sequential tests, and the pre-agreed criteria for site selection, it is considered that the overall sequential tests have been met. However, it should be noted that the inclusion of viability issues relating to the applicant's specific construction approach for the hotel, using modular construction, is not considered to be relevant. The Government guidance on sequential tests does allow for consideration of viability issues, but is not explicit that this relates to specific construction methods an applicant chooses to use. If the proposal had been acceptable in other regards, which the following assessment identifies it is not, further detail on viability would have been requested by officers.

Design Considerations and the Effect on the Major Landscape Feature

- 6.23 The NPPF (Para 124) sets out that good design is a key aspect of sustainable development. The recently published National Design Guide identifies 10 key components for good design and of particular note is the characteristic of 'Context' and it states that "*well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It should enhance positive qualities and improve negative ones.*" Additionally there is specific reference to 'views inwards and outwards'.
- 6.24 Policy CC7 requires all development to be "*of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.*" The components of design include: Layout: Urban structure and urban grain; Landscape; Density and mix; Scale: height and massing; and Architectural detail and materials.
- 6.25 Of specific relevance to consideration of design is that the proposed site is within the Thames Valley designated Major Landscape Feature (MLP under Policy EN13), in close proximity to the River Thames (Waterspaces Policy EN11) and adjacent to the Local Green Space of the Rivermead and Thameside Promenade (EN7Wp).
- 6.26 Policy EN13 states that "*Planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature.*" The supporting text states that the policy "*does not rule out development in or close to these areas, but seeks to ensure that development only takes place where it can preserve or enhance the character or appearance of the feature.*"
- 6.27 Under Policy EN11 there is the requirement for water spaces to be protected, enhanced and that "*there will be no adverse impact on*

the function and setting of any watercourse and its associated corridor”.

6.28 Policy EN7 identifies that proposals would not be permitted that *“erode their [Local Green Space’s] quality through insensitive adjacent development....”*.

6.29 The previous withdrawn scheme (ref. 181056), as shown below, would have been refused, because it was considered overly dominant in height in particular with regard to the MLF. The elevations were not considered to be of high quality and lacked an innovative design, both as a building in its own right, but also in its context within the MLF, the River and the wider environs which include Caversham Court Gardens, a Grade II Listed Registered Park and Garden, and the St. Peter’s Conservation Area.



NORTH ELEVATION



EAST ELEVATION



SOUTH ELEVATION



WEST ELEVATION



6.30 The proposed design as shown below includes the following amendments:

- The height has been reduced by ca 2.3m by removing and relocating roof top plant to the ground floor.
- The introduction of a mansard roof.
- More variation in proposed materials to include: Ground to second floor brick faced with vertical windows, above this a horizontal band of copper and glazing, and a mansard roof with slate finish.



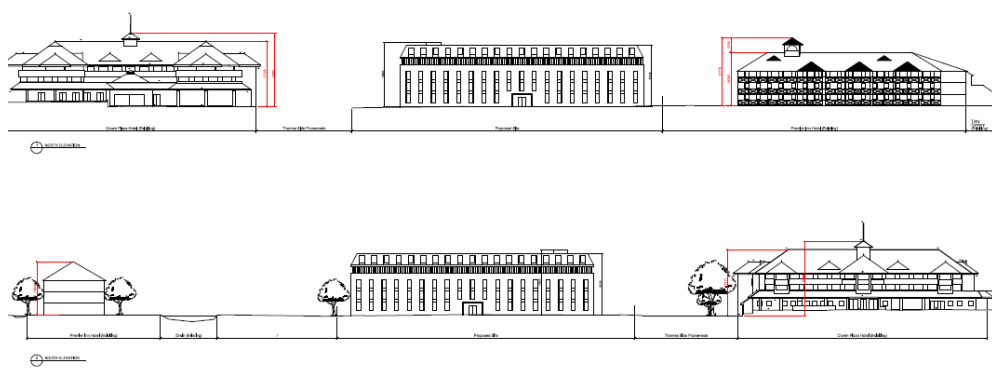
SOUTH ELEVATION - Current Scheme



WEST ELEVATION - Current Scheme



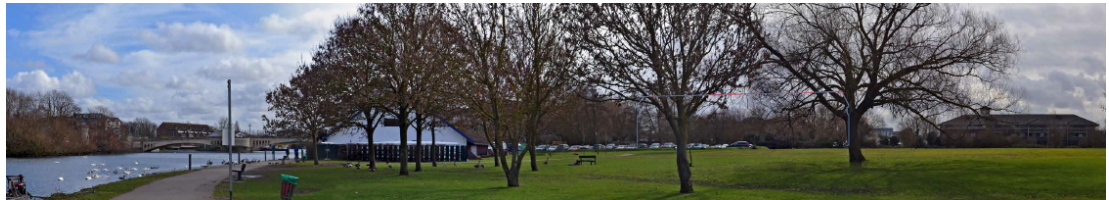
- 6.31 The supporting text to Policy EN13 (MLF) states *“The extent to which new development prevents or minimises the visual impact on major landscape features and other landscape values is largely dependent on the location, design and scale of proposals.”*
- 6.32 Although the siting and footprint within the site itself are considered acceptable in themselves, the overall height, and design of the elevations and roofscape, are not considered to offer an attractive addition to this location. The elevations appear in your officers’ opinion, austere and fortress-like.
- 6.33 Officers accept that although the surrounding buildings are of their time they do at least have some consistency in terms of pitched roof forms and gable features (see below), which assist in reducing the overall bulk of the buildings within the context. They also offer some visual interest, especially through some articulation of the elevations themselves.



- 6.34 The proposed building is in contrast to the adjacent buildings. It is a simple rectangular form, as the previous application, but with the addition of an overly-extended mansard roof, which has a minimal, if not almost the opposite effect, in achieving a reduction in the bulk of the building, and appears as a rather contrived roof form, which does not relate well to surrounding buildings. Although the height has been reduced the eaves are high compared to adjacent buildings.
- 6.35 The proposed materials of brick, recessed copper banding and slate roof are acceptable, but these on their own are not considered sufficient to create a visually interesting building or to mitigate the shortcomings of the architecture.
- 6.36 It appears as if the applicant is being constrained in design terms both by the overall quantum of rooms they state is required to make the site viable, but also the construction model they use, i.e. a modular form fabricated off site. The proposed construction approach seems to be having the effect of hindering the applicant's ability to devise a visually interesting development. Even if the proposed scheme were acceptable overall it might simply not be possible to achieve this quantum of development, whilst satisfying overall design requirements.
- 6.37 The applicant submitted a Townscape and Visual Impact Assessment (TVIA), which includes an assessment of the landscape elements which make up the site and its surrounding context and the potential effects of the proposed scheme on the sensitivity of the landscape /townspace and visual amenity and the significance of any effects.
- 6.38 Included in the TVIA, there is a section on the Berkshire Landscape Character Area Assessment (2003) as the site lies within the Character Area B3: Reading Thames. That Assessment refers to "*the majority of the character area being within the urban fringe of Reading, and that the area is visually and physically intruded by urban fringe uses creating a landscape of poor-moderate character and declining condition.*" It suggests that "*the overall strategy should be to conserve and restore and, where possible enhance the landscape for the benefit of recreational uses*".

- 6.39 As part of para 3.1 of the TVIA it acknowledges that *“The most sensitive visual receptors are those experiencing direct views towards the site from within the Major Landscape Feature; from the Thames Promenade; from Caversham Bridge and from within St Peters Conservation Area immediately north of the Thames.”* Para. 3.46 of the TVIA states that *“The site and its features make no notable contribution to these views.”* However, the TVIA also recognises that the view from the St. Peter’s Conservation Area (CA) is of good scenic value across the MLF and that *“elements that make up the view would be difficult to restore without substantial detriment to the overall view.”* This is important to note especially in the context of Policy EN1, which states that *“Development will not detract from the enjoyment, layout, design, character, appearance, features or setting of the park or garden, key views out from the park, or prejudice its future restoration.”* [officer emphasis]
- 6.40 The TVIA concludes that on completion of the scheme there would be *“no deterioration or improvement of the view.”* (Para. 5.19). Even if it is accepted that the site currently makes no specific contribution to the view, in its current form as a car park it is considered it has limited detrimental effect on the MLF. This is because at present you do not perceive it and it just appears as part of the view which terminates in the trees, which surround the site. It must surely be the case that development of the site would be detrimental to the wider MLF, in particular the view from the Conservation Area, and indeed would not conserve, restore or enhance the landscape. This view is supported by CADRA who drafted the Conservation Area Appraisal on behalf of the CAAC and the Council.
- 6.41 The TVIA includes wireline images of the proposed scheme from different viewpoints. Some of these are included below and it is the opinion of officers that despite the reduction in height from the withdrawn scheme these still demonstrate that the proposed building would be visually prominent.





- 6.42 Although amendments have been made in comparison to the withdrawn scheme with respect to height, by lowering the building, and seeking to reduce the building mass with a crown/ mansard type roof, it is not considered that these changes have achieved a good quality design. The form is very simple, and is considered to be visually harmful, irrespective of materials proposed. From the information presented within the TVIA it is also considered that the building would still appear as a dominant feature within the designated area of the MLF, and would have a detrimental effect on views across the MLF.
- 6.43 The recommendation above therefore includes a reason for refusal related to the scale and mass of the building, overall design and the resultant detrimental effect on the character and appearance of the MLF and on views across it from the St. Peter's Conservation Area including from Caversham Bridge, The Thames Promenade, and Caversham Court Gardens.

Transport

- 6.44 The proposed scheme is located on part of the site of the existing Crowne Plaza car park accessed from the west side of Thames Promenade. The proposal includes two access points to the car park. The existing car park currently provides 200 spaces. Following the redevelopment, it would provide 118 spaces (including 6 disabled spaces) - 50 spaces within the northern car park, and 68 within the southern car park). Taxi drop off/collection would take place within the southern car park. 6 cycle spaces are also proposed.
- 6.45 It is proposed that the car parking spaces of the proposed hotel (118) and existing Crowne Plaza Hotel (22 bays) (which has 122 bedrooms, meeting rooms which can cater for up to 445 delegates, a healthclub and spa) would be shared, with car park management combined for the two sites. The submitted transport information sets out that the remaining car parking areas will be allocated as follows:
- The Restaurant and Health Club guests (within Crowne Plaza) - 20 spaces;

- Crowne Plaza Hotel guests - 58 spaces and
 - New hotel guests- 62 spaces
- 6.46 The Car Park Management Plan identifies a number of measures:
- Guests would be required to pre-book a parking space;
 - Details would be on the website of options for sustainable travel to the hotel, and location of public car parks;
 - Guests who had not pre-booked a car parking space, would be redirected towards a public car park in Reading upon arrival;
 - Signage would be provided within the car park stating that the car park is solely for the use of guests who had reserved a car parking space;
 - Car parking enforcement measures would be implemented; and
 - Ongoing monitoring of the measures set out in the car parking management plan.
- 6.47 A Travel Plan has been submitted which relates to staff and guests for both hotels.
- 6.48 A car parking occupancy survey was undertaken by the applicant and concludes that nearby public car parks would have capacity to accommodate any overspill and that it was reasonable to state that hotel guests would not attempt to park on street, and combined with not permitting staff to park on site would reduce car parking overspill locally.
- 6.49 Additionally the Transport assessment concludes that the development would result in a negligible increase in total person trips undertaken during the local transport network peak hour, and it is not considered that it would result in a significant impact on the operation of the local highway network nor impact severely on the capacity of the public transport networks.
- 6.50 Refuse collection would take place within the site and with regard to delivery and serving this is proposed to be shared with the Crowne Plaza within their land ownership.
- 6.51 Many of the objections received, however, include concern over the total proposed parking provision and the likely overspill into the adjacent public car park by hotel users, specifically that at Thames Side Promenade. It is considered that any additional use of this car park by hotel users would have a significant detrimental effect on users of the Rowing Club and the public, as recreational users of the Thames Promenade, and visitors to Caversham Court Gardens (this is the closest public car park).
- 6.52 Although some amendments have been made to the previous withdrawn scheme with respect to access and further information submitted, this is insufficient to address fundamental transport concerns. Having reviewed the submitted information Transport, as

set out in detail in section 4 above, still conclude that the proposal would not be acceptable because:

- It would not comply with vehicle parking standards (Policy TR5);
- There is insufficient information to enable the traffic and transport implications to be fully assessed (Policies CC6, TR1 and TR3); and
- It would not comply with relevant servicing standards (Policy TR3).

6.53 Therefore the recommendation above includes transport reasons for refusal.

6.54 Additionally, it should be noted that as well as servicing arrangements, for which a specific reason for refusal is recommended, proposed parking and travel plan measures are proposed to be shared with Crowne Plaza. Had the scheme been acceptable overall, including clearly demonstrating that such measures would be acceptable, then a specific mechanism for their control through a S106 legal agreement would have been required. However, at present there is an overriding transport objection, with a reason for refusal based on insufficient information.

Landscaping

6.55 The application site is subject to a TPO, which includes 11 Alder trees and Plane trees adjacent to the Highway and is in an area of less than 10% tree canopy cover and is on a route that Reading's Tree Strategy identifies as being important for trees.

6.56 The submitted information confirms that the proposal would result in the loss of all the TPO Alder trees, but due to their condition and the proposed net gain of 16 trees, the Natural Environment Officer considers their removal to be acceptable. In comparison to the withdrawn scheme, three Plane trees, outside, but adjacent to the site, also protected, are to be retained. The scheme also includes for a comprehensive landscaping scheme which will include additional boundary hedging and planting within the site.

6.57 There were some minor adjustments required, as set out in the consultation section above, to the overall landscaping scheme and associated details, which have largely been addressed. However, following officers advising the agent that the application would be recommended for refusal, the applicant instructed the agent to undertake no further work. These matters are, however, not sufficient to warrant a reason for refusal.

6.58 The proposal is therefore considered to accord with relevant Policies, CC7, EN7, EN13 & EN14 and the aims of the Reading Tree Strategy to increase canopy cover, with respect to landscaping matters

Sustainability

- 6.59 The Adopted Local Plan includes a number of policies CC2, CC3, and CC4, which require the reduction of consumption of resources and materials, the use of energy, and the associated emission of greenhouse gases that contribute towards climate change. Policy CC2 specifically requires non-residential major developments to meet an 'Excellent' BREEAM standard, where possible. Policy CC4 states that *"Any development of more than 20 dwellings and/ or non-residential development of over 1,000 sq m shall consider the inclusion of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision."*
- 6.60 The submitted BREEAM Statement and BREEAM Pre-assessment conclude that the proposed scheme could achieve *"59.52% of credits" "which exceeds the 55% threshold to achieve a BREEAM new construction Other Buildings 2018 Very Good rating."* *"It is requested that the BREEAM Very Good target with a minimum score of 55% is acceptable for this development due to the additional difficulty of compliance against the New Construction 2018 scheme."*
- 6.61 This falls well below the new RBLP policy requirement of 70% and although Policy CC2 does acknowledge that for some uses such as industrial uses, warehouses and schools it might be more difficult to meet these standards. In cases where it might be more difficult to achieve this standard then *"developments must demonstrate that the standard to be achieved is the highest possible for the development, and at a minimum meets the BREEAM 'Very Good' standard."* It is not clear why a new hotel development, which is a new-build development, could not achieve this standard, and the issue appears to be the construction quality standard to be used in the modular system. It is therefore recommended that this forms one of the reasons for refusal.
- 6.62 Notwithstanding the above, it should be noted that the proposed scheme would adopt a number of energy efficiency and demand reduction measures and would also incorporate facilities for decentralised energy with Combined Heat and Power (CHP) to meet the hot water requirements for the hotel. Air source heat pumps would be incorporated as a source of renewable energy through meeting a proportion of the heating and cooling demand.

Environmental matters

- 6.63 *Air quality:* the site is located within an Air Quality Management Area (Policy EN15), and there was an original objection from Environmental Protection and Nuisance (EP&N), because of the potential for the proposed development to increase emissions. However, further to the submission of an Air Quality Assessment EP&N confirmed that there would be a very limited increase in

emissions and this would not take emissions over the objective level for nitrogen dioxide and no mitigation would be required.

6.64 **Flood Risk:** Para 163 of the NPPF requires that when determining applications LPAs should ensure that flood risk is not increased elsewhere this is also set out within RBLP policy EN18. Development should only be allowed in areas at risk of flooding (having passed the sequential test) where it can be demonstrated that:

a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;

b) the development is appropriately flood resistant and resilient;

c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;

d) any residual risk can be safely managed; and

e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

6.65 The site is in Flood Zone 2 and the submitted FRA identifies that a safe access and evacuation route would be achievable within the site boundary and beyond via Richfield Avenue. The proposed finished floor level would be at 38.75m AOD, which is above the flood level of 38.65m AOD, which is 1 in 100 year flood event plus a 25% climate change allowance. The FRA includes the calculation of the greenfield runoff rate for the development site and the estimated run-off from the current car park. A proposed drainage strategy is presented which seeks to provide a significant improvement over the current site performance such that the site would be closer to greenfield performance. The assessment identifies the implementation of a SUDS, which had the overall proposed development been considered acceptable, would have been managed through conditions. The proposed scheme would accord with relevant national and local flood risk policies.

6.66 **Contamination:** Policy EN16 states that *“development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment, during demolition and construction phases as well as during the future use of the site.”*

6.67 The submitted Phase 1 contamination report identified that according to EA records the site is located on a former landfill site, which was active between 1970 and 1979. Such a site could be a source of a range of contaminants, with the potential for ground gas, which would pose a high level of risk to end users of the site. The

report therefore recommends that intrusive site investigations are undertaken to confirm and investigate the preliminary findings.

- 6.68 Both the EA and RBC's Environmental Protection and Nuisance Team (EP&N) recommend contamination related conditions to fully characterise the site, identify remediation measures and implement such measures, prior to development.
- 6.69 With respect to land gas, however, although EP&N suggest similar conditions to those for contamination, they highlight that ideally such monitoring and risk assessment should be carried out prior to permission being granted because the results could require development to be significantly altered or conclude that it is not suitable for development. As insufficient detail is currently available to determine whether the site would be suitable for development from a land gas perspective the recommendation includes a reason for refusal on this basis.

Section 106

- 6.70 In addition to Community Infrastructure Levy, and in accordance with Policy CC9, the following S106 obligations would be sought:
- Public realm improvements - £50k towards public realm
 - Employment Skills and Training Plan or contribution for both construction and end user.
 - Transport contribution - to be advised in the Update Report
 - Occupancy restrictions - not for more than 3 months by the same occupier; no minimum period of occupation.
- 6.71 Although the Planning Statement acknowledges and agrees with the principle of a number of the above obligations, no final position was reached during the course of the application. Indeed the agent did not consider that a contribution towards the public realm was necessary or required. Officers provided further justification via email on 4th October 2019 as follows:

The proposed hotel would be adjacent to a part of the Thames Parks, i.e. the promenade and associated facilities by the River, and there would be future hotel guests who would use the Thames Parks with the resulting direct increase in use and demand for provision such as seating, lighting, bins, tables, etc. There would, therefore, be a direct impact specifically arising from the development, and therefore, additional infrastructure is required.

The current CIL and S106 framework, which you highlight [agent], does allow for leisure contributions to be sought where outdoor recreation would directly serve a new development and where improvements would be necessitated by the development including those in close proximity to a site. It is considered that a specific contribution towards S106 to enhance the current facilities would be necessary to make the scheme acceptable and the proposed £50k would be directly related in kind and scale to the proposed scheme.

This would be based on a modest contribution for the number of people assumed to use the proposal over the lifetime of the scheme (132 bed hotel, assuming 75% occupancy per year, and 50% of those people using the facilities around the hotel).

It is not unusual for developments to pay for Section 106 contributions alongside their required CIL payments particularly where there is little or no outdoor leisure facilities on site. Some examples of schemes where leisure contributions have been secured, since the introduction of CIL, where developers also had CIL contributions to make, are as follows:

180319 - Portman Road - Application for 211 dwellings with associated access, cycle path provision, parking, landscaping and open space provision, following demolition of existing buildings (amended description). - £160K - improvements to the Portman Road NEAP

180358 - Bristol & West Arcade - Demolition of vacant former Bristol & West Arcade (173 - 175 Friar Street) and erection of an eight storey mixed -use building (plus basement) to provide 35 residential units, 4,208 sqm of B1 office floorspace, and 5 retail units (A1/A2/A3), demolition of rear parts of 29 - 31 and 32 Market Place, the change of use of the retained units at 27 - 28, 29 - 31/32 Market Place at first, second and third floors to provide 8 residential units, change of use at ground and basement level of 32 Market Place from A2 to flexible retail use (A1/A2/A3), retention of 260.4 sqm of A4 use at ground and basement at 29-31 Market Place, change of use at ground and basement of 27 - 28 Market Place to flexible retail use (A1/A2/A3), and associated internal and external works to the Listed Buildings, landscaping, refuse, plant, cycle stores and substation at basement level - £43k Forbury Gardens.

151914 - Worton Grange - A Hybrid application seeking outline planning permission for the development of up to 175 new homes, including affordable housing(with all matters reserved apart from access), and full planning permission for the development of 12 commercial units in flexible use within Classes B1(c),B2 and B8,two car showrooms with MOT and servicing(Sui Generis), three retail warehouse units (Class A1),120 bed hotel (Class C1),pub with restaurant facility (Class A4),coffee shop (Class A1), restaurant (Class A3), and bank (Class A2). New vehicular access from Basingstoke Road and Imperial Way. Bus stop facilities, hard and soft landscaping and other ancillary development(Summarised Description) - £139K - improvements to Whitley Wood Recreation Ground.

It is therefore considered necessary to secure S106 for specific enhancements to the provision of the Thames Parks in the vicinity of the proposed hotel, particularly in the context of the types of

projects that CIL have been used for by the Council, and where there is little or no outdoor leisure provision on site.

The lack of an agreed Section 106 agreement therefore forms another recommended reason for refusal as set out above.

Equalities Impact

- 6.72 In determining this application the Council is required to have regard to its obligations under the Equality Act 2010 and whether there is no indication or evidence (including from consultation on the application) that the protected groups have or will have different needs, experiences, issues and priorities in relation to the particular planning application.
- 6.73 Policy CC7 specifically states that design should “*Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily.*” Although access into the building, the ground floor and upper floor communal areas appear, from the submitted information, to be accessible to all, it is not clearly evident from the details shown on the floor plans, labelled as ‘typical room’ as to whether these would be able to accommodate wheelchair users. This will be checked further and reported in an update. If it is shown that a reasonable proportion of rooms would not be capable of access by wheelchair users then this could lead to a further reason for refusal. This would be because, in terms of the key equalities protected characteristics, it would not have been demonstrated that the layout would not have an adverse impact.

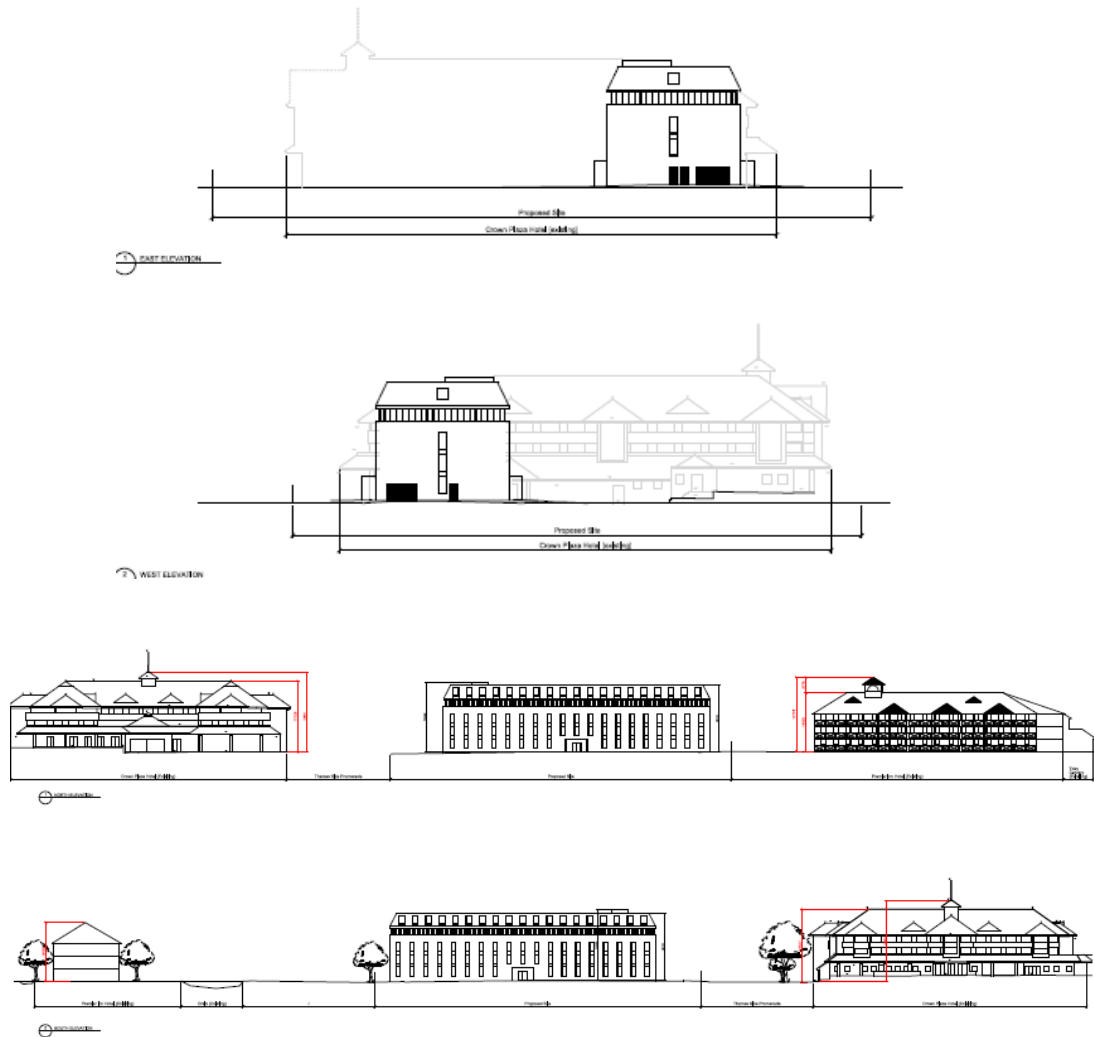
7 CONCLUSION

- 7.1 The issues above have been communicated to the applicant, who has elected not to withdraw the application. This proposal has been carefully considered in the context of the Reading Borough Local Plan 2019, and supplementary planning documents. Despite officers working positively and proactively with the applicant on this scheme, there are significant areas which remain unresolved and for the reasons set out in the above report, a refusal of permission is recommended.

Case Officer: Alison Amoah

APPENDIX 1: PLANS

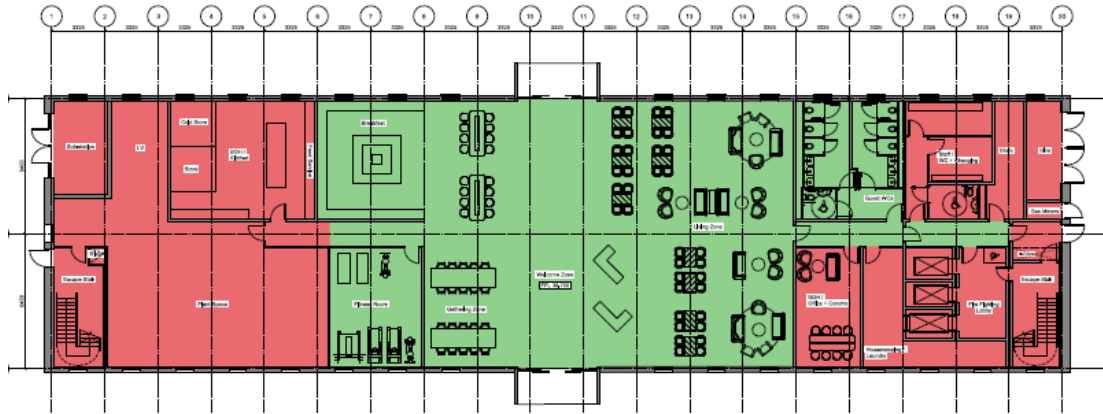
Elevations



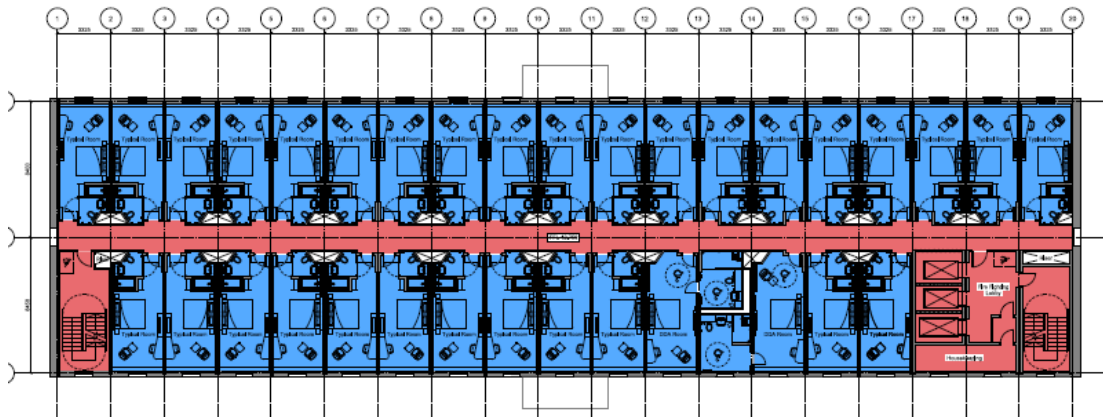
Planting Plan



Ground Floor Plan



First through to Fourth Floor Plan



Roof Plan

