



Great Brighams Mead,
Vastern Road, Reading
RG1 8DJ

PLANNING STATEMENT

Application for prior approval of 72 proposed New dwellinghouses on Detached buildings in commercial or mixed use - Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 20, Class AA, for the proposed additional storeys to result in a third and fourth floor. (Revised application)

September 2022

INTRODUCTION

1. This Planning Statement has been prepared on behalf of Kings Oak Miami LLP (the Applicant) in support of their revised application submitted for Great Brighams Mead, Reading 8DJ RG1 under Schedule 2, Part 20, Class AA, which seeks to create a third-floor and fourth floor extension to provide 72 additional residential dwellings roof level.
2. This document should be read in conjunction with the following drawings prepared by Peek Architects and supporting documents listed below: -
 - *Full Planning Application Form*
 - *CIL Forms*
 - *Site Location Plan P1048-EX112*
 - *Existing plans:*
 - *P1048-PL111 Existing block plan*
 - *P1048-EX001 Existing Ground Floor Plan*
 - *P1048-EX002 Existing First Floor Plan*
 - *P1048-EX003 Existing Second Floor Plan*
 - *P1048-EX005 Existing Roof Plan*
 - *P1048-EX006 Existing South Elevation*
 - *P1048-EX007A Existing North Elevation*
 - *P1048-EX008 Existing West Elevation*
 - *P1048-EX009 Existing East Elevation*
 - *Proposed plans:*
 - *P1048-PL401A - SITE PLAN*
 - *P1048-PL406 D ROOF PLAN*
 - *P1048-PL404 D THIRD FLOOR*
 - *P1048-PL405 D FOURTH FLOOR*
 - *P1048-PL407 F NORTH ELEVATION*
 - *P1048-PL409 E EAST ELEVATION*
 - *P1048-PL408 E SOUTH ELEVATION*

- *P1048-PL410 E WEST ELEVATION*
 - *P1048-PL401-OP-2 SITE PLAN (Clocktower removed)*
 - *P1048-PL406B- OP-2 ROOF PLAN (Clocktower removed)*
 - *P1048-PL407B- OP-2 NORTH ELEVATION (Clocktower removed)*
 - *P1048-PL409A- OP-2 EAST ELEVATION (Clocktower removed)*
 - *P1048-PL408B- OP-2 SOUTH ELEVATION (Clocktower removed)*
 - *P1048-PL410B- OP-2 WEST ELEVATION (Clocktower removed)*
 - *Transport Statement (by Stantec)*
 - *Flood Risk Assessment (by Stantec)*
 - *Daylight Sunlight Assessment – 2.1 (by FPD)*
 - *Technical Note – Noise (by Stantec)*
 - *Ground Conditions Assessment (by Stantec)*
 - *Structural Report MBP-8632 (by MBP) 23 March 22*
 - *CGI Views (View 1 and 2)*
3. The applicant's proposed scheme involves the retention of the clocktower as a feature of the building. This approach was strongly encouraged in the officer's report assessing previous application 220778/DDP, and as such, the revised scheme has been informed by this previous design assessment.
4. It should be noted that an additional set of plans are included with the submission which proposes the removal of the clock clocktower. The plans are identified above as 'clocktower removed'.
5. The 'clocktower removed' version is included in the event that officers consider that the rebuilding of the clock tower falls outside of the Class AA permitted development, with respect to condition "(a) engineering operations reasonably necessary to construct the additional storeys and new dwellinghouses;" With the exception of the clocktower, the two versions of the scheme are identical.

6. The supporting information has been prepared in accordance with the local authority's validation requirement.
7. This application follows the Reading's decision to give prior approval (under Class 0, Part 3 of Schedule 2) for a change of use from office use Class B1(a) to use Class C3 to comprise 110 residential units.

SITE CONTEXT

8. Great Brighams Mead is located to the north of Reading town centre and south of the River Thames. The site is bounded by Caversham Road roundabout with Vastern Road, to the south, Brighams Road to the west, residential apartments, to the north, and residential properties fronting De Montfont Road, to the east.
9. The existing building provides 6,190sqm of office accommodation across three floors.
10. The external areas of the site comprise 160 spaces car parking spaces.
11. The site is served by a single vehicle access via the Caversham Road/Vastern Road roundabout to the south of the site. This access also provides the primary pedestrian access routes into the site.
12. Great Brighams Mead office building is located centrally with respect to the site boundary and has an access route circulating the building providing access to parking and accommodating servicing and deliveries.
13. The site is in close proximity to Reading Railway Station and Reading Town Centre providing the site with a vast assortment of amenities.
14. The site is located within the Local Plan's defined central area.

15.The site is not listed and is not located within a conservation area.

16.The Environment Agency (EA) Flood Zone map shows the site is located in Flood Zone 3 'High Probability' of the River Thames (as defined in Planning Practice Guidance (PPG) 'Flood Risk and Coastal Change' Table 1): - Flood Zone 3 'High Probability' (greater than 1 in 100 (>1.0%) annual probability of river flooding).

17.The site is located within an Air Quality Management Area.

18.The site benefits from Prior Approval for a change of use to residential to provide 110 dwellings, granted 1st June 2021 (R/N: 210567).

19.PLANNING HISTORY

20.The Reading Borough Council public access database records the following planning history:

21.**220778/DDP** | *Application for prior approval of 72 proposed New dwellinghouses on Detached buildings in commercial or mixed use - Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 20, Class AA, for the proposed additional storeys to result in a maximum overall building height of 21.92m; Refused 4 August 2022.*

22.**210567** | *Change of use from office use Class B1(a) to use Class C3 to comprise 110 residential units. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015; Approved 1 June 2021.*

Existing Use

23. The existing building on-site provides 7,725sqm of office accommodation across three floors. The building benefits from Prior Approval for a change of use to residential as described above.

24. PLANNING POLICY CONTEXT

25. Legislation

26. Town and Country Planning (General Permitted Development) Order 2015 (as amended).

27. On the 15th April 2015 the Town and Country Planning (General Permitted Development) (England) Order 2015 (subsequently amended) was formally brought into force.

28. Schedule 2, Part 20, Class AA provides permitted development rights for new dwellinghouses on detached blocks of flats under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). This was inserted on 01 August 2020 by The Town and Country Planning (Permitted Development and Miscellaneous Amendments) (England) (Coronavirus) Regulations 2020.

29. Where any development under Class AA is proposed, development is permitted subject to the condition that before beginning the development, the developer must apply to the local planning authority for prior approval of the authority as to:

- (a) transport and highways impacts of the development;
- (b) air traffic and defence asset impacts of the development;
- (c) contamination risks in relation to the building;
- (d) flooding risks in relation to the building;

- (e) the external appearance of the building, including—
 - (i) the design and architectural features of—
 - (aa) the principal elevation; and
 - (bb) any side elevation that fronts a highway; and
 - (ii) the impact of any works under sub-paragraph (1)(c) or (d) of Class AA;
- (f) the provision of adequate natural light in all habitable rooms of the new dwellinghouses;
- (g) impact on the amenity of the existing building and neighbouring premises including overlooking, privacy and the loss of light; and
- (h) impacts of noise from any commercial premises on the intended occupiers of the new dwellinghouses;
- (i) impacts of the introduction of, or an increase in, a residential use of premises in the area on the carrying on of any trade, business or other use of land in the area;
- (h) whether because of the siting of the building, the development will impact on a protected view identified in the Directions Relating to Protected Vistas dated 15 March 2012 issued by the Secretary of State, and
- (i) where the existing building is 18 metres or more in height, the fire safety of the external wall construction of the existing building

30. Paragraph B of Class A of Part 20 sets out the procedure for applications for prior approval under Part 20.

31. NATIONAL POLICY & GUIDANCE

National Policy – National Planning Policy Framework (NPPF) 2021

- **Section 2** – Achieving Sustainable Development
- **Section 9** – Promoting Sustainable Transport
- **Section 11** – Making Effective Use of Land
- **Section 12** – Achieving Well-Designed Places
- **Section 14** – Meeting the Challenge of Climate Change, Flooding and Coastal Change

National Advice: -

- National Planning Policy Framework (NPPF) (2021)
- Planning Practice Guidance (PPG) (2014 onwards)
- National Design Guide 2019 (NDG)
- Technical housing standards – nationally described space standard 2015 (NDSS)

32. Development Plan

33. For the purposes of Prior Approval applications such as this, the Development Plan is the NPPF.

PROPOSALS

34. These proposals are submitted to determine whether the development of a third floor and fourth floor would be permitted development under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 20, Class AA.

35. The proposals comprise an upward extension of two floors to the existing roof, delivering 72 residential units.

36.The proposed residential mix would comprise (36 x 1-bedroom units and 36 x 2-bedroom units), with associated car and cycle parking and bin storage provided at ground floor level.

37.The description of the development is as follows: *“Application for prior approval of 72 proposed New dwellinghouses on Detached buildings in commercial or mixed use - Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 20, Class AA, for the proposed additional storeys to result in a third and fourth floor.”*

38.The proposal will be designed to be in keeping with the rest of the building below, the street and the local area. The extension would incorporate similar materials as the existing building and incorporates certain architectural features from the existing building, such as the side bays.

39.The proposed units provide residential accommodation that is compliant with the National Technical Standard for minimum floor areas, as demonstrated below: -

FLOOR	UNIT QUANTITY (on these levels)	UNIT CODE	No of Beds	No. of People	INTERIOR GIA (sqm)	NDSS (m2)
3rd	1	T.01	2	4	92	70
	2	T.02	1	2	61	50
	3	T.03	1	2	50	50
	4	T.04	2	3	64.5	61
	5	T.05	1	2	50	50
	6	T.06	2	3	61	61
	7	T.07	2	3	61	61
	8	T.08	2	3	61	61
	9	T.09	1	1	45	37
	10	T.10	1	1	45	37
	11	T.11	1	2	73.9	50
	12	T.12	1	1	45	37
	13	T.13	1	2	55.4	50
	14	T.14	1	1	45	37

	15	T.15	2	3	64.8	61
	16	T.16	2	4	82.35	70
	17	T.17	2	3	65	61
	18	T.18	2	3	69	61
	19	T.19	2	4	81.1	70
	20	T.20	1	2	60.7	50
	21	T.21	1	2	50	50
	22	T.22	2	3	64.5	61
	23	T.23	1	1	45.6	37
	24	T.24	2	3	61	61
	25	T.25	2	3	64.8	61
	26	T.26	2	3	61	61
	27	T.27	1	1	45	37
	28	T.28	1	1	45	37
	29	T.29	1	2	73.9	50
	30	T.30	1	1	45	37
	31	T.31	1	2	55.4	50
	32	T.32	1	1	45	37
	33	T.33	2	4	82.4	70
	34	T.34	2	3	64.8	61
	35	T.35	2	3	65	61
	36	T.36	2	3	68.5	61
4th	37	FO.01	2	4	81	70
	38	FO.02	1	2	62.4	50
	39	FO.03	1	2	50	50
	40	FO.04	2	3	64.5	61
	41	FO.05	1	1	45.6	37
	42	FO.06	2	3	61	61
	43	FO.07	2	3	64.8	61
	44	FO.08	2	3	64.9	61
	45	FO.09	1	1	45	37
	46	FO.10	1	1	45	37
	47	FO.11	1	2	73.9	50
	48	FO.12	1	1	45	37
	49	FO.13	1	2	55.4	50
	50	FO.14	1	1	45	37
	51	FO.15	2	3	64.8	61
	52	FO.16	2	4	82.35	70
	53	FO.17	2	3	65	61
	54	FO.18	2	3	69	61
	55	FO.19	2	4	81.1	70

	56	FO.20	1	2	60.7	50
	57	FO.21	1	2	50	50
	58	FO.22	2	3	64.5	61
	59	FO.23	1	1	45.6	37
	60	FO.24	2	3	61	61
	61	FO.25	2	3	64.8	61
	62	FO.26	2	3	64.9	61
	63	FO.27	1	1	45	37
	64	FO.28	1	1	45	37
	65	FO.29	1	2	73.9	50
	66	FO.30	1	1	45	37
	67	FO.31	1	2	55.4	50
	68	FO.32	1	1	45	37
	69	FO.33	2	4	82.4	70
	70	FO.34	2	3	64.8	61
	71	FO.35	2	3	65	61
	72	FO.36	2	3	68.5	61
TOTALS	72			169	4336.9	

PLANNING ASSESSMENT

40. The development proposals can only be assessed against the legislation prescribed by Schedule 2, Part 20, Class AA of the Town and Country Planning (General Permitted Development Order 2015 (as amended)) are relevant. Where necessary, the relevant policy tests lie within the NPPF. The legislation is discussed in turn below.

41. The development proposals comply with the relevant section or subsection of Class A as demonstrated below:

Class AA - new dwellinghouses on detached buildings in commercial or mixed use	
Permitted development	Applicant comment
AA.-(1) Development consisting of works for the construction of up to two	COMPLIES

<i>additional storeys of new dwellinghouses immediately above the topmost storey on a detached building to which sub-paragraph (2) applies, together with any or all—</i> <i>(a)engineering operations reasonably necessary to construct the additional storeys and new dwellinghouses;</i> <i>(b)works for the replacement of existing plant or installation of additional plant on the roof of the extended building reasonably necessary to service the new dwellinghouses;</i> <i>(c)works for the construction of appropriate and safe access to and egress from the new dwellinghouses and existing premises in the building, including means of escape from fire, via additional external doors or external staircases;</i> <i>(d)works for the construction of storage, waste or other ancillary facilities reasonably necessary to support the new dwellinghouses.</i>	AA (1)The proposal comprises only two additional storeys, (i.e. a 3rd and 4th floor). a) The additional two storeys are proposed to provide 72 new dwellinghouses over and additional 2 floors on top of a detached building in commercial or mixed use. All engineer operations are considered reasonably necessary to construct the additional storeys and new dwellinghouses; No roof terraces are proposed. b) Two roof level plant enclosures are proposed in a similar arrangement, where by the plant is sunken in the roof and enclosed by parapet wall. c) As with the previous application and as per fire brigade advice, the applicant would accept a condition to ensure that the development conforms to fire safety standards. d) All ancillary facilities (i.e. bike and bins stores) are considered to be reasonably necessary to support the new dwellinghouses.
Development not permitted	Applicant comment
<i>AA.1. Development is not permitted by Class A if—</i>	
<i>(za) the permission to use the building as a dwellinghouse has been granted only by virtue of Class MA of Part 3 of this Schedule</i>	COMPLIES - Permission was granted to use the existing building as a dwellinghouse by virtue of Class O. Class O was superseded by class MA but as Class O is not directly listed in the legislation, and has been considered compliant due to the omission of Class O from AA.1 (za) requirements.

	Notwithstanding the above, the works to implement the Class O development are yet to commence.
<i>(a) above ground level, the building is less than 3 storeys in height</i>	COMPLIES – The existing building comprises 3 storeys above ground level
<i>(b) the building was constructed before 1st July 1948, or after 5th March 2018</i>	COMPLIES – Constructed circa 2000
<i>(c) on 5th March 2018 the building was in a use other than— (i) a use or mixed use within paragraph AA(2)(a) or (b); or (ii) a use falling within Class C3 of the Schedule to the Use Classes Order;</i>	COMPLIES – the building was used for a use falling within Class B1: Conversion to residential Under Class O has been granted on the basis that the building was in use as on 30 May 2019. The building has been in use as B1(a) since it was constructed in 2000.
<i>(d) the additional storeys are constructed other than on the principal part of the building.</i>	COMPLIES – the extension is proposed over the two principal office areas. These areas are linked by a central core providing circulation and services/amenities.
<i>(e) the floor to ceiling height of any additional storey, measured internally, would exceed the lower of (i) 3 metres; or (ii) the floor to ceiling height, measured internally, of any storey of the principal part of the existing building;</i>	COMPLIES – proposed floor to ceiling height is 2.6m. Please refer to the proposed south elevation (PL408). Existing floor to ceilings are as follows- 3.3m at ground, 2.8m at first and 2.7m at second floor.
<i>(f) the new dwellinghouses are not flats;</i>	COMPLIES – 72no. flats proposed
<i>(g) the height of the highest part of the roof of the extended building would exceed the height of the highest part of the roof of the existing building by more than 7 metres (not including plant, in each case);</i>	COMPLIES. The additional height proposed by the development would measure 5m on the outer parts of the building and 2m on the central core of the building. (Refer to drg. P1048-PL407 E NORTH ELEVATION)
<i>(h) the height of the highest part of the roof of the extended building (not including plant) would be greater than 30 metres;</i>	COMPLIES – to top of existing main roof 23389mm (including clocktower)

<i>(i) development under Class A.(a) would include the provision of visible support structures on or attached to the exterior of the building upon completion of the development;</i>	COMPLIES – as shown on drawings and letter ref. MBP-8632.MB, dated 23 March 2022 from MBP.
<i>(j) development under Class A.(a) would consist of engineering operations other than works within the existing curtilage of the building to— (i) strengthen existing walls; (ii) strengthen existing foundations; or (iii) install or replace water, drainage, electricity, gas or other services;</i>	COMPLIES – No engineering operations outside of the existing curtilage are proposed, as shown on drawings and structural report/letter ref. MBP-8632.MB (23 March 2022) from MBP.
<i>(k) in the case of Class AA.(1)(b) development there is no existing plant on the building;</i>	COMPLIES – The existing plant is contained within the roof level, with the existing roof enclosing it like a parapet wall.
<i>(l) in the case of Class AA.(1)(b) development the height of any replaced or additional plant as measured from the lowest surface of the new roof on the principal part of the extended building would exceed the height of any existing plant as measured from the lowest surface of the existing roof on the principal part of the existing building;</i>	COMPLIES – New roof level plant is spilt across to locations at roof level and inset into the roof, similar to the arrangement of the existing enclosure. The height of the plant would not exceed the height of the existing roof plant.
<i>(m) development under Class AA.(1)(c) would extend beyond the curtilage of the existing building;</i>	COMPLIES – as shown on drawings. Existing plant height measures 3900mm. Proposed plant height measure 1300mm.
<i>(n) development under Class AA.(d) would— (i) extend beyond the curtilage of the existing building; (ii) be situated on land forward of a wall forming the principal elevation of the existing building; or (iii) be situated on land forward of a wall fronting a highway and forming a side elevation of the existing building;</i>	COMPLIES – Ancillary structures (bin/bike stores located as required) Refer to Ground Floor Plan Proposed PD401

(o) the land or site on which the building is located, is or forms part of— (i) article 2(3) land; (ii) a site of special scientific interest; (iii) a listed building or land within its curtilage; (iv) a scheduled monument or land within its curtilage; (v) a safety hazard area; (vi) a military explosives storage area; or (vii) land within 3 kilometres of the perimeter of an aerodrome.	COMPLIES – the site is not subject to any of these designations.
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CONDITIONS AA.2.: -	Applicant comment
(1) Where any development under Class A is proposed, development is permitted subject to the condition that before beginning the development, the developer must apply to the local planning authority for prior approval of the authority as to:-	
(a) transport and highways impacts of the development;	Please see the supporting Transport Statement by Stantec [summary below] - The Transport Statement concludes that the proposed 72 new flats would have no detrimental impact on the local highway network. The site is located in a highly sustainable central location, with easy access to footways and cycle routes. The site is also accessible by a comprehensive network of public transport services. Car parking provision will be retained as per the existing arrangements, with the exception of the loss of 2no. car parking spaces to accommodate cycle storage, and the provision

	of 23no. Electric Vehicle Charging Points. This will result in a total of 156 car parking spaces, including 10 disabled spaces. This provision is in line with RBC's standards, considering its location between Zones 1 and 2 set out in RBC's parking standards. Cycle parking is proposed to be split across two cycle stores at ground level, one within the building with 38 cycle spaces, and one to the rear of the site along the northern boundary, with space for 64 cycles. The proposed provision is in excess of RBC's standards. Within the main build foyer area, 2no. bin stores with space for 11 x 1,100L and 5x1,100L bins, respectively, will be located at ground level adjacent to the lifts. Bins within the store will be moved by a Facilities Management (FM) team that will be available on site, to the proposed bin collection area with space for weekly collection by RBC. The bin collection area will have space for 24 x 1,100L bins, in line with RBC's waste standards. It is predicted that the proposed residential development would generate 102 two-way people trips in the AM peak period between 08:00 and 09:00, and 119 two-way people trips in the PM peak period between 17:00 and 18:00. This represents a net reduction of 63 and 30 two-way people trips in the AM and PM peak periods, respectively, in comparison with the people trip generation associated with the existing office development.
<i>(b)air traffic and defence asset impacts of the development;</i>	No air traffic or defence assets are located in the area which could be impacted by the development.
<i>(c)contamination risks in relation to the building;</i>	The site is not on contaminated land and the proposed development will not present any contamination risks. The ground conditions have been assessed under recent application ref:210567 and considered acceptable.

	We enclose a Ground Conditions Assessment (Phase 1) prepared by Stantec, which considers the potential for contamination on the site. The report states that the preliminary ground instability assessment identified that all the ground stability hazards were rated as very low or low potential. The identified low risk has been dealt with through the adoption of piled foundations. Therefore, the report determines that the change of use for the building will not have a negative effect on the current foundation. The council has confirmed that the site has not been identified as statutory “contaminated land” under Part IIa of the Environmental Protection Act, 1990. The current and historical ground investigation is sufficient to assess the risk for redevelopment and further ground investigation is not considered necessary. Therefore, the report concludes that no significant risks are presented by the site for the redevelopment and change of use from commercial to residential, and there are no contamination risks as to why Prior Approval should not be granted.
<i>(d)flooding risks in relation to the building;</i>	Environment Agency (EA) Flood Zone mapping and modelled flood data shows that the site lies within Flood Zone 3a ‘High Probability’ (land at a 1 in 100 or greater annual probability of river flooding). The main source of flood risk for the site is fluvial. The data shows the site is affected by flooding from the River Thames and it lies within Flood Zone 3 ‘High Probability’. The remaining sources of flood risk are considered to be a low risk. National climate change guidance set out in the Planning Practice Guidance (PPG) confirms that the site conditions require consideration of an increase in peak river flow of +31% ('Central' allowance, Thames and South Chilterns management catchment, Flood Zone 3a, More Vulnerable development)

	Flood data from the EA Thames 'Sandford to Mapledurham' 2018 model has been extracted around the site. This provides a present-day 1 in 100 annual probability flood level of 38.06m AOD, which affects the external site area to shallow depths. The applicable climate change allowance for the site is +31% in the 2080s epoch (2070-2115), but the EA have undertaken modelling of a +35% allowance for climate change scenario. This scenario has been used as a conservative proxy for the applicable allowance. At the reference 1 in 100 annual probability +35% allowance for climate change flood level of 38.36m AOD, external flooding is more significant around the site, and the existing building (at 36.20m AOD) would be subject to shallow flooding. The proposed mitigation strategy demonstrates the development is safe through a number of measures as follows: - Floor levels of the third and fourth floors are over 10m above the design 1 in 100 annual probability +35% allowance for climate change flood level; - As a third and fourth floor extension, the scheme features no change to building footprint and no alterations to external ground levels. As such, there will be no impact on floodplain storage capacity or flood flow routes. - As a third and fourth floor extension, the proposals will have no impact on the surface water drainage arrangements over the site. - Safe access is available during the present day 1 in 100 annual probability event. Provision of a 'Flood Risk Management Plan' will ensure that residents of the proposed development can receive sufficient warning to evacuate the site before flooding begins to affect the area in a more severe climate change scenario in accordance with the Reading Borough
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	Council (RBC) Strategic Flood Risk Assessment (SFRA). As the development is for the addition of a new floor comprising 2 flats above the existing building, the site impermeable surface around the site remains as existing. As such, the development has a neutral impact on the existing flood risk. In conclusion, the future occupants and users of the proposed development will be safe from flooding and there will be no detrimental impact on third parties. As such, there is no reason prior approval should not be granted for the scheme on flooding or flood risk grounds. The proposal complies with the National Planning Policy Framework (NPPF) and Policy EN18 of the Local Plan with respect to flood risk and is an appropriate development at this location.
<i>(e) the external appearance of the building including:</i> <i>(i) the design and architectural features of—</i> <i>(aa) the principal elevation; and</i> <i>(bb) any side elevation that fronts a highway; and</i>	The proposed development would add a third and fourth floor over the existing building. The site comprises commercial building arranged over three storeys (ground plus first and second floors). The footprint is designed in the form of the letter 'H'. The scheme proposes a two storey extension to provide residential development over the top of the existing second floor. Surrounding development ranges from two to four storeys. In response to comments on the previous application regarding the amount of glazing and the form of the building, this revised scheme proposes a different approach to the appearance of the extension. Firstly the amount of glazing on the east and west elevations has been reduced to reflect the fenestration at ground and first floor, as opposed to the second floor which incorporates a higher amount of glazing.

	The proposed third and fourth floors are now proposed to be clad with brickslips to closely reflect the brick found at existing lower levels. The balconies have also been omitted, for amenity reasons, which also contributes to a reduction in glazing from the upper levels, given the glass balustrades were proposed. The glazed doors to the balconies have been removed from these elevations as no longer required. The north and south elevations incorporate light grey cladding providing a transition with the roof materials. Balconies are proposed for the north and south elevations. It is proposed for these to be white powder-coated and toughened glass All new windows are to be white aluminium framed to match the existing building. The roof is proposed to be finished in grey tiles with zinc junctions and aluminium rainwater fittings. The proposed external design is considered to respect the design and architectural features of the existing building and responds appropriately to the character and detailing of the side and front/rear elevation. In terms of massing, the existing building occupies a large footprint which is considered to lend itself well to the proposed additional height, without the extension appearing disproportionate. Overall it is considered that the materials proposed are appropriate to the surrounding context and would successfully integrate the extended building with the adjacent red brick Victorian terraced buildings and flats at Regents Riverside. Please refer to the proposed elevations and CGIs for further details.
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<i>(f) the provision of adequate natural light in all habitable rooms of the new dwellinghouses;</i>	The approved flats arranged ground, first and second floors, all achieved adequate daylight as assessed under application ref. 210567. The proposed units are all served by windows and would follow a similar layout to the approved units approved across the lower floors. As such, the proposed flats are considered receive adequate daylight.
<i>(g) impact on the amenity of the existing building and neighbouring premises including overlooking, privacy and the loss of light;</i>	<u>Daylight/Sunlight</u> The application is supported by a Daylight & Sunlight Assessment (DSA) which considers the potential impact of the proposed 2-storey rooftop extension on neighbouring properties and amenity spaces. The site adjoins residential uses to the north, east and west. The DS report assesses the following properties: - 106 Caversham Road - 1-9 Brigham Road (& Brigham Mews) - Regents Riverside - 1-31 De Montfort Road - 17 Vastern Road - West of Caversham Road The results of the daylight assessment indicate that all of the assessed neighbouring windows would retain a VSC (Vertical sky component) of 27% or not less than 0.8 times their former level. Thus the reduction in daylight levels to these windows would not be noticeable according to the BRE guidance. In terms of Annual Probable Sunlight Hours (APSH), the results of the sunlight analysis indicate that the assessed windows have been shown to pass both the APSH tests (annual & winter). In terms of gardens and amenity space, the analysis shows that more than half the area of the amenity spaces of neighbouring properties would receive at least 2 hours of sunlight on 21st March.

	The values of daylight levels and annual sunlight hours are thus considered to be acceptable for all surrounding properties, according to the BRE guidance. <u>Privacy/Overlooking</u> With respect to privacy, Local Plan Policy C8 indicates that <i>“back-to-back distance of 20 metres between dwellings is usually appropriate, although the circumstances on individual sites may enable dwellings to be closer without a detrimental effect on privacy.”</i> Proposed window to window distances would be greater than 25m. As such, there would be no material harm to existing neighbours as a result of the two additional floors of accommodation. To the north the distances increase to 30-40m. The revised scheme substantially reduces the potential for overlooking from the east and west sides of the building. This has been achieved through the removal of all east and west-facing balconies along with a reduction in windows and glazed doors. The proposed fenestration would be less than currently exists on the second floor, resembling the window arrangement on ground and first floor. The higher level position of the proposed flats further increases distances compared to the approved flats located at lower levels in the building. The top floors are also stepped back, which together with their height, limits any material harm in terms of overlooking. It should also be noted the existing mature trees planted along the western boundary obscure direct views to and from the site from the street. To the east, there are also trees planted in rear gardens which offer some screening benefits. <u>Visual dominance and overbearing effects of a development</u> The proposed roof extension is set back at third and fourth floors along the east and west
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	elevations. This reduces any perceived visual impact from these viewpoints. The proposed scheme has been assessed in terms of its impacts on daylight, sunlight and overshadowing. The values of daylight levels and annual sunlight hours are considered to be acceptable for all surrounding properties, according to the BRE guidance. <u>Harm to outlook</u> As set out above, the design of the two storey extension is set back from the existing eaves. Given the position of the application building, it is not considered that the additional massing would have any material impact on the existing outlook from neighbouring properties. Although harm to outlook is not measured by BRE, VSC assessment offers a useful guide. This existing building is currently visible from all sides, although somewhat obscured by trees and vegetation. There are no direct views through the site, only views over the building towards the sky. It should be noted that the development does not breach the 25-degree rule for properties located to the north and south, demonstrating that VSC analysis is not a BRE requirement for these properties. From the east and western properties, the impact on VSC has been assessed and these properties all meet BRE requirements. Please refer to the Daylight Sunlight report for further details.
<i>(h) impacts of noise from any commercial premises on the intended occupiers of the new dwellinghouses;</i>	The application is accompanied by a Noise Report prepared by Stantec which analyses the impacts of noise from surrounding commercial premises on the intended residential occupiers of the development. A noise survey was undertaken with reference to BS4142:2014, in order to adversely impact the sound climate at the development site, commercial noise from the identified

	commercial uses would need to exceed the background sound levels be more than 5 dB (i.e. 60-65 dB during the daytime). Given the distances between the commercial uses and the development site, the report determined that it is very unlikely that noise levels from the commercial uses would exceed these levels. The application site itself is situated within a residential area, which infers that there is a low likelihood of noise impact from commercial uses. Therefore, the noise levels are acceptable for residential use and as such, there is no reason prior approval should not be granted.
<i>(i)impacts of the introduction of, or an increase in, a residential use of premises in the area on the carrying on of any trade, business or other use of land in the area;</i>	Given the siting atop the roof of the building, the number of units being introduced, and the mixed-use nature of this central location, no adverse impacts on business or trade from the development are anticipated.
<i>(j)whether, because of the siting of the building, the development will impact on a protected view identified in the Directions Relating to Protected Vistas dated 15th March 2012(11) issued by the Secretary of State,</i>	There are no identified statutorily protected views in the area.

SUMMARY

42. This Planning Statement has been prepared on behalf of Kings Oak Miami LLP (the Applicant) in support of their revised application submitted for Great Brighams Mead, Reading 8DJ RG1 under Schedule 2, Part 20, Class AA, which seeks to create a third-floor and fourth floor extension to provide 72 additional residential dwellings roof level.
43. The proposed application has been considered against Schedule 2, Part 20, Class AA of the Town and Country Planning (General Permitted Development Order 2015 (as amended)).

44. As set out in this statement and supporting information, it is considered that development is permitted by virtue of compliance with Class AA.1. criteria (a-o) and conditions AA.2. (a-j) prescribed by the Order: In summary:

- In terms of transport, the proposal would not result in any detriment to the operation of the local highway network and there are no transport or highways reasons why prior approval should not be granted for the scheme;
- Contamination is not an issue on the site as shown in the assessment supporting this application and there is no contamination reason why prior approval should not be granted for this scheme;
- The accompanying flood risk assessment demonstrates that the residential use of the land would not have a material impact upon flooding or flood risk. It concludes that there is no flooding or flood risk reason why prior approval should not be granted.
- The noise assessment concludes that the noise impacts on future residential occupiers are acceptable and there is no reason why prior approval should not be granted on noise grounds;
- The proposed flats would receive adequate internal daylight levels and there is no reason prior approval should not be granted for the scheme on internal daylight grounds; and
- In terms of the flats approved under application ref. 210567, the units at the ground floor level have been assessed and continue to achieve adequate daylight.
- There would be no impact upon the amenity of the existing neighbouring properties or amenity spaces, including overlooking, privacy and the loss of light;

45. We therefore consider that the application proposals pass the relevant legislative tests set out by Schedule 2 and Prior Approval should be granted accordingly.