

Planning Statement

Archway House, Gosbrook Road, Caversham

January 2022

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1. Introduction

- 1.1 This Planning Statement has been prepared by Turley on behalf of Federated Hermes Property Unit Trust ('the Applicant') in support of a request for prior approval at Archway House, Gosbrook Road, Caversham, Reading, RG4 8HU ('the Site').
- 1.2 The request is made to Reading Borough Council ("the Council") as Local Planning Authority (LPA) for the conversion of floorspace previously in uses as office floorspace (Use Class E) and a Chiropractic Practice (Use Class E) to residential apartments under Class MA of the General Permitted Development Order 2015 (as amended) ('the Proposed Development').

- 1.3 The full description of the Proposed Development as set out in the application form is as follows:

"Application for Prior Approval for change of use of part of the building from offices and chiropractor (Use Class E) to form 4 residential apartments (Use Class C3)."

- 1.4 The principle purpose of this Planning Statement is to demonstrate the compliance of the Proposed Development against the provisions of Class MA of Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

Structure of Planning Statement

- 1.5 The sections of this Planning Statement are structured as follows:
- **Section 2 – The Site and Surrounding Area:** describes the location of the Site and its features as well as those of the surrounding area
 - **Section 3 – Planning History:** sets out the planning history of the Site
 - **Section 4 – Relevant Legislation:** established the legislation relevant to the proposals
 - **Section 5 – The Proposals:** explains the Proposed Development
 - **Section 6 – Assessment of the Proposals:** assesses the Proposed Development's compliance with relevant legislation
 - **Section 7 – Conclusions:** provides key conclusions and an overview of the case for the Proposed Development

2. The Site and Surrounding Area

Site Location and Surrounding Area

- 2.1 The Site is located to the north of Reading, within the Caversham area of Reading. The site is located within the defined Caversham District Centre and is surrounded by a range of retail and service units, commercial floorspace and residential properties, extending along Gosbrook Road and Church Street.
- 2.2 The site abuts residential uses to the east, within the eastern part of Archway House. The buildings adjoin Church House to the west, which is in use as office accommodation to the west. Directly to the south west is the servicing area for Waitrose which forms part of the wider St Martin's Centre, which anchors the district centre. To the south-east is an existing office building fronting Archway Road.
- 2.3 The Site fronts onto Gosbrook Road to the north, at its junction with Church Street. The building is positioned astride Archway Road which provides vehicular access to St Martins Centre car park.
- 2.4 The Site has good public transport accessibility with Reading Train Station located approximately a 1.5km walk to the south of the Site, via Christchurch Meadows. Reading Train Station provides regular services to destinations including London, Basingstoke and Newbury, and locations further afield. Numerous bus stops are also located within close proximity to the Site. The closest is positioned along Church Street (approximately 210m from the Site) and provides regular services to High Wycombe, Henley-on-Thames, Reading town centre and Emmer Green.

Site Description

- 2.5 The site comprises a 'T' shaped building fronting Gosbrook Road, and includes the western side of Archway House as well as the bridge section that connects the eastern and western sides of the building. In total, the building extends to four storeys.
- 2.6 The floor area subject to this prior approval application relates to the rear of the ground floor and all of the first, second and third floors of the western element of Archway House, totalling 379.05 sqm (GIA). The floorspace associated with the former offices and chiropractor are vacant, and have been vacant for a minimum of 3 months at the time of the application for prior approval.
- 2.7 The subject application does not include the retail unit on the ground floor of Archway House fronting Gosbrook Road. Whilst this unit is currently vacant, on the basis of the last confirmed use, it is considered to fall within Use Class E. It is not proposed to convert this floorspace to residential use through this prior approval application.
- 2.8 The eastern section of the Archway building also falls outside the application area. It is already in residential use with an operational physiotherapy business at ground floor.

3. Planning History

- 3.1 Based on inspection of the Council's online public access system, the table below summarises the relevant planning history relating to the Site.

Council Planning Reference	Description of Development	Decision and Date of Decision
111132	Change of use of second floor office from Office (B1) to Chiropractic Practice (D1)	Approved 30 March 2011
171145	Internal and external alterations to the existing building	Approved 26 September 2017

- 3.2 It is highlighted that whilst planning permission ref. 111132 was fully implemented, the chiropractor practice vacated the building on 22nd September 2021. Following the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 coming into force on the 1st September 2020, the former D1 Chiropractor Practice now falls within Use Class E.
- 3.3 The last known use of the remainder of the building is office floorspace (formerly B1a now Use Class E). The offices have laid vacant since 2015, however we can confirm the floorspace was in use as offices for a continuous period of at least 2 years.
- 3.4 With regard to planning application 171145, this permission has only been partially implemented with regard to the following alterations:
- Amendments to the front elevation of Archway House relating to the re-positioning of the access door and the construction of a canopy to serve the ground floor commercial unit (N.B this floorspace is outside the scope of this prior approval submission)

4. Relevant Legislation

- 4.1 This section details the relevant legislation that needs to be considered in relation to the proposed development, including the Town and Country Planning (Use Class) Order 1987 and the 2020 revision.
- 4.2 The Town and Country Planning (Use Class) Order 1987 categorised the existing use of a chiropractor as Class D1 (a) (any use not including a residential use for the provision of any medical or health services except the use of premises attached to the residence of the consultant or practitioner) and the offices as Class B1 (a) (use an office other than a use within class A2 (financial and professional services)).
- 4.3 However, on 1 September 2020, the Town and Country Planning (Use Class) Order 1987 was revised, which resulted in former Classes A1/2/3, B1, D1 (a-b) and 'indoor sport' being revoked and subsequently being categorised as Class E. To a large extent, the updates to the Use Class Order were introduced to reflect a shift in the government agenda which saw a strong focus on the need to change the retail and business models within town centres.
- 4.4 As such, the existing uses of the application site are now Class E (e) and Class E (g)(i) for the chiropractor and offices, respectively.
- 4.5 In June 2020, the government released a 'build, build, build' statement which outlined radical reforms to the planning system. The new regulations provide greater freedom for existing commercial properties to be converted into residential units. It was stated that this will support *"high street revival"* and *'reduce the pressure to build on greenfield land by making brownfield development easier'* and ultimately make it *"easier to build better homes where people want to live."*¹
- 4.6 In a later Ministerial Statement (July 2021) it was articulated that the changes are important to *'support mixed and flexible high streets, to deliver additional homes more easily, and to support jobs in the construction industry, while increasing demand for local high street services through new high street homes.'* It is anticipated that this will encourage more people to utilise the high street which will cement them at the heart of communities and allow them to *'thrive for the future.'* (MHCLG, 2021)².

The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) (No.2) Order 2021

Procedure for applications for prior approval

- 4.7 Class W of Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2021 ('the Order') sets out the documentation that is required to support a prior approval application alongside the

¹ Prime Minister's Office 10 Downing Street (2020), *PM: Build, Build, Build*. Available from: <https://www.gov.uk/government/news/pm-build-build-build>.

² Ministry of Housing, Communities and Local Government (MHCLG) (2021) *Revitalising high streets and town centres*. Available from: <https://questions-statements.parliament.uk/written-statements/detail/2021-07-01/hcws145>

requirements for the Local Planning Authority to serve notice of the proposed development.

Class MA – Commercial, Business and Service Uses to dwellinghouses

- 4.8 Class MA of Part 3 of Schedule 2 of the Order allows *“development consisting of a change of use of a building and any land within its curtilage from a use falling within Class E (commercial business and service) of Schedule 2 to the Use Classes Order to a use falling within Class C3 (dwellinghouse) of Schedule 1 of that Order.”*
- 4.9 Where sections of the Order are directly relevant to the consideration of this prior approval, these have been included below and assessed within Section 6 of this Statement.
- 4.10 Clause MA. 1. states that
- 1) *Development is not permitted by Class MA:*
 - (a) *Unless the building has been vacant for a continuous period of at least 3 months immediately prior to the date of the application for prior approval;*
 - (b) *Unless the use of the building fell within one or more of the classes specified in sub-paragraph (2) for a continuous period of at least 2 years prior to the date of the application for prior approval;*
 - (c) *If the cumulative floor space of the existing building changing under Class MA exceeds 1,500 square metres;*
 - (d) *If land covered by, or within the curtilage, of the building*
 - (i) *Is or forms part of a site of special scientific interest;*
 - (ii) *Is or forms part of a listed building or land within its curtilage;*
 - (iii) *Is or forms part of a scheduled monument or land within its curtilage;*
 - (iv) *Is or forms part of a safety hazard area; or*
 - (v) *Is or forms part of a military explosive storage area;*
 - (e) *If the building is within*
 - (i) *An area of outstanding natural beauty*
 - (ii) *An area specified by the Secretary of State for the purposes of section 41 (3) of the Wildlife and Countryside Act 1981 (1);*
 - (iii) *The Broads;*
 - (iv) *A National Park; or*

(v) *A World Heritage Site*

2) *The classes mentioned in 1(b) are the following classes of the Use Classes Order*

(a) *The following classes of the Schedule as it had effect before 1st September 2020*

(i) *Class A1 (shops)*

(ii) *Class A2 (financial and professional services)*

(iii) *Class A3 (food and drink)*

(iv) *Class B1 (business)*

(v) *Class D1 (a) (non-residential institutions – medical or health services)*

(vi) *Class D1 (b) (non-residential institutions – crèche, day nursery or day centre)*

(vii) *Class D2 (e) (assembly and leisure – indoor and outdoor sports), other than use as an indoor swimming pool or skating rink*

(b) *On or after 1st September 2020, Class E (commercial, business and service) of Schedule 2*

4.11 *Paragraph MA.2. states the development under Class MA is permitted subject to the following conditions*

1) *Before beginning development under Class MA, the developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to:*

(a) *Transport impacts of the development, particularly to ensure safe site access;*

(b) *Contamination risks in relation to the building;*

(c) *Flooding risks in relation to the building;*

(d) *Impacts of noise from commercial premises on the intended occupiers of the development;*

(e) *Where:*

(i) *The building is located in a conservation area, and*

(ii) *The development involves a change of use of the whole or part of the ground floor, the impact of that change of use on the character or sustainability of the conservation area;*

- (f) *The provision of adequate natural light in all habitable rooms of the dwellinghouses;*
- (g) *The impact on intended occupiers of the development of the introduction of residential use in an area the authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses; and*

5. The Proposals

- 5.1 The current application seeks prior approval for the change of use of the existing Class E floorspace within Archway House from offices and a chiropractor (Use Class E) to residential apartments (Use Class C3) in accordance with the Order.
- 5.2 The Proposed Development is for the creation of 4 residential apartments with ancillary floorspace to serve as bike storage and plant area.
- 5.3 The proposals relate to the part ground, first, second and third floors of the western extent of Archway House only.
- 5.4 At ground floor level, access to the residential units would be provided to the rear of Archway House (south western extent). The external access door leads into an entrance hallway providing lift and stair access to the upper floors. The retail unit at ground floor level fronting Church Street is outside the scope of this approval and is retained as self-contained Class E floorspace with a separate access arrangement to the front of the property.
- 5.5 At first floor level, the floorspace is proposed for plant equipment and cycle parking / storage to serve the residential apartments.
- 5.6 The second and third floor levels will accommodate the proposed residential apartments. There will be two apartments accommodated on each level accessed via a communal corridor. The residential provision is as follows:

Second Floor	Area
1 bed 2 person apartment	55.7 sqm
2 bed 3 person apartment	74.2 sqm
Third Floor	Area
1 bed 2 person apartment	51.7 sqm
2 bed 3 person apartment	71.9 sqm

- 5.7 The floor areas proposed for each apartment accord with Nationally Described Space Standards as required under Article 3 (paragraph 9A(b)) of the Town and Country Planning (General Permitted Development Order 2015 (as amended))³.
- 5.8 The floorplans accompanying this submission include reference to the total floor space in square metres of each apartment.

³ As introduced through The Town and Country Planning (General Permitted Development) (England) (Amendment) Regulations 2020

- 5.9 No external alterations to the building are proposed through this prior approval submission. The existing building is capable of being converted to accommodate the proposal without requiring alterations to the external elevations of the building.

6. Assessment of the Proposal

- 6.1 This section provides an assessment of the current proposals against the criteria set out in the Order to demonstrate that prior approval should be issued.

Procedural Compliance

- 6.2 Under Part 3 Class W of the Order, the following has been provided to support this submission:

- A written description of the proposed development as set out paragraph 1.3 above, with confirmation that there is a net increase of 4 dwellings proposed (Compliance with Class W(2)(a) and ba);
- The prior approval form and this Statement confirms the Applicant details, with Turley acting as agents on their behalf;
- A site location plan and a series of proposed floorplans and existing elevations demonstrating the proposed development as follows (Compliance with Class W(2)(bc):

Drawing	Reference	Scale
Site Location Plan	10000 Rev -	1:1250 @ A2
Site Plan	10001 Rev -	1:200 @ A2
Existing Ground Floor Plan	11000 Rev -	1:100 @ A2
Existing First Floor Plan	11001 Rev -	1:100 @ A2
Existing Second Floor Plan	11002 Rev -	1:100 @ A2
Existing Third Floor Plan	11003 Rev -	1:100 @ A2
Existing Elevations	13000 Rev -	1:100 @ A2
Proposed Ground Floor Plan	11010 Rev -	1:100 @ A2
Proposed First Floor Plan	11011 Rev -	1:100 @ A2
Proposed Second Floor Plan	11012 Rev -	1:100 @ A2
Proposed Third Flood Plan	11013 Rev -	1:100 @ A2
Proposed Elevations	13010 Rev -	1:100 @ A2

- Reference on the proposed floorplans indicating the total floorspace in square metres of each apartment and the proposed use of each room (Compliance with Class W(2)(bc).

- 6.3 We note that under Class W Paragraph 8, there is a requirement for the Local Planning Authority to serve notice of the proposed development.

Proposal Compliance

- 6.4 For ease, we provide a summary of the proposals against each of the relevant criteria contained within Clause MA1 of the Order.

Requirement of Paragraph MA1	Proposal Compliance
(a) Unless the building has been vacant for a continuous period of at least 3 months immediately prior to the date of the application for prior approval;	Whilst a large proportion of the subject floorspace within the building has been vacant for over 10 years as documented through the planning history on the site, the floorspace within the building has been entirely vacant since 1 st October 2021. Therefore, the building has been vacant for continuous period of months on the date of this planning submission.
(b) Unless the use of the building fell within one or more of the classes specified in sub-paragraph (2) for a continuous period of at least 2 years prior to the date of the application for prior approval;	The lawful use of the subject floorspace falls within Class E (formerly use class B1(a) and D1) for a continuous period of at least 2 years on the date of the submission as demonstrated through the planning history of the site
(c) If the cumulative floor space of the existing building changing under Class MA exceeds 1,500 square metres;	The subject floorspace is 379.05sqm thus does not exceed the 1,500 sqm threshold, and therefore benefits from the permitted development rights under Class MA.
(d) If land covered by, or within the curtilage, of the building (i) Is or forms part of a site of special scientific interest; (ii) Is or forms part of a listed building or land within its curtilage; (iii) Is or forms part of a scheduled monument or land within its curtilage; (iv) Is or forms part of a safety hazard area; or (v) Is or forms part of a military explosive storage area;	The land covered by or within the curtilage of the building does not fall within any of the areas identified within MA1 (d).
(e) If the building is within (i) An area of outstanding natural beauty (ii) An area specified by the Secretary of State for the purposes of section 41 (3) of the Wildlife and Countryside Act 1981 (1);	The building does not fall within an of the areas identified under point MA1 (e)

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- (iii) The Broads;
 - (iv) A National Park; or
 - (v) A World Heritage Site
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Technical Compliance

- 6.5 Clause MA.2 states the development under Class MA will be permitted subject to satisfying a number of conditions. The conditions have been set out below and considered in turn to demonstrate that the proposed development will satisfy these requirements. The accompanying technical evidence submitted with this application provides further detail in respect of these criteria.

Transport Impact

- 6.6 A Transport Assessment was conducted by Tetra Tech and accompanies this submission. The Assessment provides an audit of the existing transport conditions in the environs of the site, including a description of the local highway network and accessibility. It also outlines the anticipated level of trip generation and the impact of the development on the local highway network.
- 6.7 As part of the assessment, an audit of personal injury accident data was conducted which found no cause for concern and the arrangement of the local highway network is not seen as a contributing factor to the recorded incidents.
- 6.8 The assessment also confirmed that the site within a sustainable location, with regards to services and facilities located within the district centre of Caversham, and with respect to the good level of accessibility to public transport. Moreover, it stated that the site offers the potential for the majority of trips generated by the site to be made by sustainable, non-car modes.
- 6.9 The report forecasts that the development will generate 4 additional two-way trips both the AM and PM peak periods. As a result of the car-free operation of the site, trips generated will be undertaken on the sustainable transport network. Consequently, the report confirms that the addition of 4 trips to the network will have an immaterial impact on local pedestrian, cycle or public transport movements, generating a negligible impact to its operational capacity. The trips generated will also replace trips generated by the site's extant Class E land use. The proposal will not generate a severe impact to local network operation in terms of transport movement or safety.
- 6.10 Overall, the assessment concluded that the proposal presents no significant transport impacts. The residual cumulative impacts of the proposal are not considered to be severe, with safe and suitable provision provided to accommodate future transport users. It is considered the proposals accord with the requirements of Clause MA2 (point (b)) of the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2021.

Contamination Risks

- 6.11 A Preliminary Risk Assessment has been prepared by Fairhurst to address Clause MA.2.2 (point b) (contamination) of the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2021. This Assessment supports this submission.
- 6.12 The report concluded that no complete pollutant linkages were identified given the absence of significant sources of contamination and the ground disturbance during works. As a result of these findings, the report stated that no further work is considered necessary to address the low risk rating.
- 6.13 Importantly, the latest Asbestos Management Survey for the site was also reviewed and, whilst it does not relate to the contamination in the ground, it is recommended that the asbestos is removed and disposed of by a specialist contractor in accordance with asbestos regulations prior to refurbishment.

Flood Risk

- 6.14 A Flood Risk Assessment has been prepared by Glanville Consultants to assess the existing level of flood risk to the site and its surroundings within the context of the development proposals and to demonstrate a suitable drainage strategy for the disposal of surface water from the site. The Assessment is included as part of this submission.
- 6.15 The report considered flooding risk from all sources, including appropriate allowance for climate change, and subsequently concluded that the site can be developed safely without increasing flood risk elsewhere. The assessment further concluded that the proposal would not involve an increase in the current impermeable area and, therefore, there will be no increase in surface water run-off and no increase in flood risk downstream.
- 6.16 With regards to run-off, the assessment established that this can be managed through the existing drainage system that currently serves the office building and associated hardstanding areas, without increasing flood risk either on-site or elsewhere. Consequently, a new drainage system is not deemed necessary.
- 6.17 It is considered the Assessment addresses requirements Clause MA2 (point (c)) of the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2021.

Noise

- 6.18 A Noise Assessment has been conducted by Resound Acoustics to consider the impact of commercial sources of noise in the area on potential occupants of the proposed development.
- 6.19 The noise climate at the site was established by direct measurement and the suitability of the site for the proposed development considered against requirements of the Clause MA2 (point (d)) of the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2021.

- 6.20 An assessment was undertaken in accordance with British Standard 4142: 2014 + A1: 2019 and shows that noise from servicing activities at a nearby supermarket, the key identifiable commercial source affecting the site, is unlikely to lead to an adverse impact.
- 6.21 It is considered that the supporting reports addresses requirements Clause MA2 (point (d)) of the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2021.

Daylight/ Sunlight

- 6.22 A Daylight/Sunlight report was conducted by GIA to assess the potential availability of Daylight and Sunlight to the proposed residential accommodation.
- 6.23 With regards to daylight, technical assessments were undertaken within all of the proposed habitable rooms with reference to the BRE tests for Average Daylight Factor (ADF), No-Sky Line (NSL) and Room Depth Criterion (RDC). The report concluded that all the proposed rooms meet the BRE's recommendations for ADF, NSL and RDC and, consequently, are considered well day-lit meaning good levels of daylight are provided to all units.
- 6.24 In respect of sunlight, all living spaces with a main window facing within 90° of due south were assessed for Probable Sunlight Hours (PSH), both annually (APSH) and in winter (WPSH). The results show that the two living areas relevant for testing far exceed the recommended sunlight levels throughout the year and in winter. Accordingly, it considered that the scheme will provide future occupants with excellent levels of sunlight overall.
- 6.25 As a whole, the report considers that adequate natural daylight is provided within the proposed accommodation and that residents will be provided with access to very good levels of daylight and sunlight overall.
- 6.26 It is considered that the supporting reports addresses requirements Clause MA2 (point (f)) of the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2021.

7. Conclusions

- 7.1 This planning application for Prior Approval seeks consent for the change of use of the existing Class E floorspace (offices and chiropractor) within Archway House to form 4 residential apartments (Use Class C3).
- 7.2 The proposal has been comprehensively assessed against the requirements in Class MA of the Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021.
- 7.3 As demonstrated in paragraph 6.2 of this Statement, the proposal satisfies the criteria set out in paragraph MA.1 of the Order and is therefore the existing floorspace is deemed to benefit from the permitted development rights under Class MA.
- 7.4 Moreover, in accordance with paragraph MA.2 of the Order, a suite of technical reports were undertaken which considered the impact in terms of transport, contamination, flood risk, noise, and daylight/sunlight. The results of these studies concluded that there is no adverse impacts arising from the proposal. Consequently, the proposal is considered to be fully compliant with the Order.
- 7.5 In conclusion, the proposal should be granted prior approval on the grounds that the application accords with all relevant provisions within the Order.

Turley Office

Reading Office, The Pinnacle, 20 Tudor Road, Reading, RG1 1NH