



PLANNING STATEMENT

**Change of Use of Ground and First Floor from Class E
(g) to Residential (Use Class C3) to create four flats**

12 Tilbury Close, Caversham, Reading RG4 5JF

1. Introduction

- 1.1 UPP Architects + Town Planners have been instructed by the applicant, Benny Springer, to submit a prior approval application under Class MA of The General Permitted Development Order 2015 (as amended) at the site known as 12 Tilbury Close, Caversham, Reading, RG4 5JF. This statement should be read in conjunction with the accompanying architectural plans.
- 1.2 The proposal presented under this application is for the change of use of the ground and first floors from Class E (g) to residential (Use Class C3). The change of use will result in the creation of four studio units.
- 1.3 This document provides details of the proposed scheme and will demonstrate that this proposal is in accordance with planning policy and guidance at national, regional, and local levels.

2. The Site and Surroundings

- 2.1 The application site is characterised with a two storey detached building located off Tilbury Close. Tilbury Close forms a quiet backroad between residential streets known as Banbury Gardens and Longhurst Close to the north and west and a small retail parade known as Henley Road to the south. The host property is characterised with large front facing windows overlooking an existing off-street parking area. To the rear, high-level windows provide secondary forms of natural light for the ground and first floors. The ground and first floors are in existing use as self-contained offices.
- 2.2 The surrounding area is predominantly residential in character with a mixture of terraced, detached and semi-detached dwellings with pockets of commercial uses in the form of retail parades serving the wider residential area.
- 2.3 The site is not located within the Green Belt, Conservation Area or any Area of Outstanding Natural Beauty (AONB). The site is located within Flood Zone 1 which has a low probability of flooding. The site is not a listed building nor are there any in the immediate surrounding area. There is no relevant planning history for the site.
- 2.4 The nearest bus stops are located a 2-minute walk from the site and are known as Chiltern Road Bus Stops. It is from these bus stops that connections to Caversham Park Village, Central Reading and High Wycombe can be found. The nearest railway station to the site is Reading Station, a 30-minute walk from the site or accessible via bus. It is from Reading Railway Station that Cross Country, Great Western Railway, South Western Railway and TfL Rail services provide connections to Central London and a range of settlements further afield.

3. The Proposal

- 3.1 The proposal is for the change of use of the ground and first floors from Class E (g) to self-contained residential dwellings (Use Class C3). The proposal will result in four studio units. The units will be self-contained and accessible from the front of the building. The units will contain bedroom areas, kitchen / living / dining areas, bathrooms, storage and the provision of large front facing windows to ensure acceptable levels of daylight.

Unit	Unit Type	Size (m ²)
1	Studio	59.54
2	Studio	37.63
3	Studio	40.42
4	Studio	37.14

Figure 1 - Schedule of Areas

- 3.2 The existing site will benefit from 3 off-street parking spaces and these will be reallocated for the proposed units. Refuse storage will be provided in a dedicated storage area to the front of the property to ensure close by access for future residents and easy access for refuse vehicles. Cycle storage will be located within a dedicated storage container to the front of the site.

4. Planning Legislation

Class MA General Permitted Development Order

- 4.1 "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 (dwellinghouses) of Schedule 1 to that Order.

Development not permitted

MA.1.—(1) Development is not permitted by Class MA—

- 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;*
- unless the use of the building fell within one or more of the classes specified in subparagraph (2) for a continuous period of at least 2 years prior to the date of the application for prior approval;*
- if the cumulative floor space of the existing building changing use under Class MA exceeds 1,500 square metres;*
- 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 explosives 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;*
 - (iii) the Broads;*
 - (iv) a National Park; or*
 - (v) a World Heritage Site;*
 - f. *if the site is occupied under an agricultural tenancy, unless the express consent of both the landlord and the tenant has been obtained; or*
 - g. *before 1 August 2022, if—*
 - (i) the proposed development is of a description falling within Class O of this Part as that Class had effect immediately before 1st August 2021; and*
 - (ii) the development would not have been permitted under Class O immediately before 1st August 2021 by virtue of the operation of a direction under article 4(1) of this Order which has not since been cancelled in accordance with the provisions of Schedule 3.*
- (2) The classes mentioned in sub-paragraph (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.*

Conditions

MA.2.— (1) Development under Class MA is permitted subject to the following conditions.

(2) 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*
- h. where the development involves the loss of services provided by—*
 - (i) a registered nursery, or*
 - (ii) a health centre maintained under section 2 or 3 of the National Health Service Act 2006, the impact on the local provision of the type of services lost.*

(3) An application for prior approval for development under Class MA may not be made before 1 August 2021.

(4) The provisions of paragraph W (prior approval) of this Part apply in relation to an application under this paragraph as if in the introductory words in sub-paragraph (5), for “and highways impacts of the development” there were substituted “impacts of the development, particularly to ensure safe site access”.

(5) Development must be completed within a period of 3 years starting with the prior approval date.

(6) Any building permitted to be used as a dwellinghouse by virtue of Class MA is to remain in use as a dwellinghouse within the meaning of Class C3 of Schedule 1 to the Use Classes Order and for no other purpose, except to the extent that the other purpose is ancillary to the use as a dwellinghouse.”.

5. Assessment of Proposal

Compliance with Class MA

- 5.1 This application relates to the change of use of the ground and first floors from Class E (g) to Class C3. The ground and first floors are accessible from a dedicated entrance at ground floor level where double doors provide access to a communal hallway and stairwell to a range of office spaces. As previously referenced, the area proposed to change use has been in historic use as Class E (g) and it is considered it has been in use for a continuous period of at least 2 years prior to the date of this application for prior approval.
- 5.2 The last tenant, Field Management Services vacated the premises on 13th August 2021. Field Management Services is a management and fulfilment company with their offices previously based within 12 Tilbury Close. Attached to this application as Appendix 1, the lease relating to Field Management Services shows the tenant leased the property as Offices between 2003 and 2008. Appendix 2, a letter from the Marketing Agent, explains that this lease was rolled over on the same terms until 2021. Appendix 3 is a letter from Field Management Services confirming that their company used the building from 2003 to 2021 as offices. It is understood that the unit has been vacant since 13th August 2021 when Field Management Services vacated the property with no further tenant since. Therefore, the ground and first floors have been vacant for five months.
- 5.3 The cumulative floor space of the existing building changing use under Class MA does not exceed 1,500 square metres.
- 5.4 The building is not on article 2(5) land; in a site of special scientific interest; in a safety hazard area; in a military explosives storage area; a listed building; or a scheduled monument. The building is also not within an area of outstanding natural beauty, an area specified by the Secretary of State for the purposes of section 41(3) of the Wildlife and Countryside Act 1981, the Broads, a National Park; or a World Heritage Site.

Transport and Highways

- 5.5 As previously outlined, the nearest bus stops are located a 2-minute walk from the site and are known as Chiltern Road Bus Stops. It is from these bus stops that connections to Caversham Park Village, Central Reading and High Wycombe can be found. The nearest railway station to the site is Reading Station, a 30-minute walk from the site or accessible via bus. It is from Reading Railway Station that Cross Country, Great Western Railway, South Western Railway and TfL Rail services provide connections to Central London and a range of settlements further afield.

- 5.6 In addition to public transport, the local area contains shopping parades including the shopping parade adjacent to the site on Henley Road. A convenience store, pharmacy and take away premises are located on this parade and therefore serve to provide essential shops and services within a short walking distance of the site.
- 5.7 The site is located within Zone 3 of the RBC Zonal Scheme outlined within the Revised Parking Standards and Design SPD (2011). One-bedroom properties located within Zone 3 should provide 1.5 spaces per dwelling in accordance with parking standards outlined within the SPD. The existing site has three off-street spaces and these spaces will be retained to be used for the proposed units. It is acknowledged that the three parking spaces represent an under provision in accordance with local parking standards and therefore a parking stress survey has been undertaken to demonstrate on-street parking capacity within the local area is available. It is noted that the existing parking standards relate to 1-bedroom flats with the proposed dwellings characterised as 1-person studio units. It is noted that data from the Office of National Statistics indicates that in 2018 one-person, non-retired households had car ownership levels of 64%. The occupiers of studio flats are less likely to be reliant or have recourse to vehicle ownership and therefore the actual demand will be lower.
- 5.8 A transport technical note prepared by Paul Crosby Transport accompanies this application. The technical note outlines that the surrounding roads are characterised with acceptable levels of parking stress and the addition of three further vehicles would not result in undue harm to the local highway or result in an unacceptable level of parking stress.
- 5.9 Cycle Storage is provided for the proposed units sited towards the front of the building. The cycle storage will provide covered and secure cycle storage for 1 bike per unit.
- 5.10 Refuse storage will be provided for the proposed units sited towards the front of the building. The refuse storage location will ensure easy access for both future occupiers and refuse collection vehicles.

Contamination

- 5.11 It is considered that there is low contamination risk as there is no historic contaminant use. proposals are and it is not proposed to break into the ground or hardstanding to facilitate the change of use. As the site has been in prior use as offices, it is considered that the previous and existing use do not pose a contamination risk.

Flood Risk

- 5.12 As previously referenced, the majority of the site is located in flood zone 1 which has a low probability of flooding. Therefore, it is considered that flood risk is low and residents will have clear escape to the wider site and streetscene in the rare event of flooding.

Noise

- 5.13 Under Class MA Prior Approval applications, the consideration of noise concerns the impact of surrounding commercial premises on future occupiers of the proposed residential use.
- 5.14 A noise impact assessment prepared by Venta Acoustics accompanies this application and states that upon a site visit and assessment, it has been determined the proposed scheme is not expected to experience a significant adverse noise impact and the site is considered acceptable for the proposed residential use under the requirements of Class MA of the GPDO. The assessment includes an advisory discussion of potential mitigation in the form of building envelope performance. The client is happy to agree to noise mitigation measures by means of a condition attached to a decision notice for the application.
- 5.15 The proposals will result in four self-contained residential units accessible from the front of the property via a communal entrance. With the proposals resulting in the addition of four single-person households on site, it is considered that there will be limited impact on noise and disturbance as a maximum of four households will be entering and exiting the property via a communal entrance sited away from the boundaries with any neighbouring properties.

Daylight and Sunlight

- 5.16 The proposals have been designed to ensure that residential amenity is of a good quality. No new windows are proposed as a result of the proposals. The internal layout has been configured to ensure every habitable room has sufficient levels of daylight. Both bedroom areas and the kitchen / living / dining areas have large windows providing sufficient levels of daylight and ventilation with window measurements annotated on the submitted drawings.
- 5.17 A daylight sunlight report prepared by t16 Design accompanies this application and states that all proposed habitable rooms have plenty of natural light, well in excess of the minimum standards and means future occupiers will enjoy well-lit environments with reduced reliance on artificial lighting. All windows exceed the minimum Average Daylight Factor (ADF) requirements and therefore the proposals are considered acceptable in relation to levels of daylight.

6. Conclusion

- 6.1 It has been demonstrated that proposal meets the requirements set out Class MA of the GPDO in terms of the qualifying use and matters of transport, flooding, contamination, noise and daylight and sunlight. Accordingly, the council are respectfully requested to approve this application.