



Head of Planning, Development & Regulatory Services
Planning Department
Reading Borough Council Civic Offices
Bridge Street
Reading
RG1 2LU

7 April 2021

Dear Sir/Madam,

PRIOR APPROVAL NOTIFICATION UNDER SCHEDULE 2, PART 3, CLASS O OF THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015

GREAT BRIGHAMS MEAD, READING, RG1 8DJ

We write in relation to the above site and enclose an application on behalf of McKay Securities PLC under Class O of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (hereafter 'the Order'). This application is for the change of use at the above site from Class E (previously Class B1(a)) office to Class C3 residential use.

In addition to this covering letter, this application comprises:

- The completed application form, including a written summary of the proposed development and the developer's contact details;
- Completed Community Infrastructure Levy forms;
- Site Plan (drawing ref. (PD)_001_P01), prepared by AHMM;
- Transport Statement and Residential Travel Plan, prepared by Stantec;
- Geo-environmental & Geotechnical Ground Investigation Report, prepared by Stantec;
- Flood Risk Assessment, prepared by Stantec;
- Noise Impact Assessment, prepared by Stantec;
- Internal Daylight Analysis, prepared by Point 2;
- A set of proposed and existing drawings, prepared by AHMM:
 - Existing Ground Floor Plan (drawing ref. (PD)_010_P01)
 - Existing First Floor Plan (drawing ref. (PD)_011_P01)
 - Existing Second Floor Plan (drawing ref. (PD)_012_P01)
 - Existing Third Floor Plan (drawing ref. (PD)_013_P01)
 - Existing Roof Plan (drawing ref. (PD)_014_P01)
 - Existing Sections (drawing ref. (PD)_020_P01)
 - Existing Elevations (drawing ref. (PD)_030_P01)
 - Proposed Ground Floor Plan (drawing ref. (PD)_100_P02)
 - Proposed First Floor Plan (drawing ref. (PD)_101_P02)
 - Proposed Second Floor Plan (drawing ref. (PD)_102_P02)
 - Proposed Third Floor Plan (drawing ref. (PD)_103_P02)
 - Proposed Roof Plan (drawing ref. (PD)_104_P02)
 - Proposed Sections (drawing ref. (PD)_200_P02)
 - Proposed Elevations (drawing ref. (PD)_300_P02)
- Unit Area Schedule (Rev B), prepared by AHMM.

The application fee of £96 has been paid directly to Reading Borough Council via the Planning Portal (PP-09487999).

SITE AND SURROUNDINGS

Great Brighams Mead comprises a three-storey office development. The building fronts on to the Caversham Road – Vastern Road roundabout. The River Thames is located to the rear of the site.

The site is located to the north of Reading Train Station. The area between the site and the train station, with the Station / River Major Opportunity area, will be subject to great change in the future as this area is allocated for high-density mixed-use development

The site is located within Flood Zone 3, meaning there is a high probability of flooding. The site is not statutory or locally listed, and there are no listed buildings or scheduled monuments in the immediate area. According to Reading's Policies Map (2019), the site lies outside of the Central Core Policy Area and the Office Core Policy Area.

PROPOSED DEVELOPMENT

Prior approval is sought for the change of use from office (Class B1a) to residential (Class C3) use at Great Brighams Mead. The proposal would involve internal alterations to the existing office building to accommodate 110 residential units. No external, physical alterations are proposed.

The proposed units also comply with the Department for Communities and Local Government's Technical Housing Standards – Nationally Described Space Standards, as illustrated in the accompanying Unit Area Schedule (ref. 18141_Unit_Schedule_PD_RevB).

QUALIFYING CRITERIA

Class O of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) permits:

"O. Development consisting of a change of use of a building and any land within its curtilage from a use falling within Class B1(a) (offices) of the Schedule to the Use Classes Order, to a use falling within Class C3 (dwellinghouses) of that Schedule."

This is subject to a number of criteria, and it is necessary to identify whether:

- a) the building is on Article 2(5) land and an application under paragraph O.2(1) in respect of the development is received by the local planning authority on or before 30 May 2019;
- b) the building was used for a use falling within Class B1:
 - i. on 29 May 2013, or;
 - ii. in the case of a building which was in use before that date but was not in use on that date, when it was last in use;
- c) the site is or forms part of a safety hazard area;
- d) the site is or forms part of a military explosive storage area;
- e) the building is a listed building or is within the curtilage of a listed building; and
- f) the site is, or contains, a scheduled monument.

In response to the criteria stated above, the following should be noted in respect of this application for prior approval:

- The site is not located on Article 2 (5) land and this application has not been submitted to the local planning authority on or before 30 May 2019;
- The building was in use as offices on 29 May 2013 and is currently in office use (Class B1a);
- The site is not, nor does it form part of, either a safety hazard area or a military explosives storage area;
- The property is not a listed building and is not within the curtilage of a listed building; and
- The application site is not and does not contain a scheduled ancient monument.

Accordingly, the development satisfies all of the criteria set out in Class O.1 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), as shown above, and therefore benefits from Class O permitted development rights.

ASSESSMENT AGAINST CLASS O OF THE ORDER

Class O of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) states that in order for the change of use from Class B1(a) to Class C3 to be permitted development, the developer must apply to the local planning authority for a determination as to whether the prior approval of the authority is required, in respect of the following matters only:

- a) Transport and highways impacts of the development;
- b) Contamination risks on the site;
- c) Flooding risks on the site;
- d) Impacts of noise from commercial premises on the intended occupiers of the development;
- e) The provision of adequate natural light in all habitable rooms of the dwellinghouses.

The provisions of paragraph W (prior approval) apply in relation to that application, and paragraph W(2) under Part 3 of the Order identifies that such applications should be accompanied by:

- A written description of the proposed development;
- A site plan;
- The developer's contact address and email address;
- A site-specific Flood Risk Assessment if the application is in an area at risk of flooding; and
- The required fee.

In response to the assessment criteria under Class O and under paragraph W stated above, the following should be noted:

- The application is accompanied by and should be read in conjunction with the transport assessment, contamination assessment, flood risk assessment, noise assessment, and an internal daylight assessment submitted with this application;
- The description of development is as follows: "Change of use from office to residential to provide 110 residential units.";
- The submission pack contains a site plan;
- WSP are acting as the agent on behalf of the applicant, McKay Securities PLC. We would be grateful if all correspondence could be sent to WSP using the contact details at the top of this letter, or to sophie.ward@wsp.com; and
- The application fee of £96 has been paid directly to the Reading Borough Council.

Transport and Highways Impacts

The scheme allocates 158 car parking spaces and 88 cycle parking spaces for the proposed residential units.

Access to the building will be gained via the existing recessed entrance located on the front façade of the Great Brighams Mead building, which is proposed to be retained as primary pedestrian access. The existing secondary access to the building, located to the north of the central lobby will also be retained.

The existing pedestrian gates located off the Caversham Road/Vastern Road roundabout, and pedestrian gate off Brighams Road, towards the north-western corner of the site, will be retained. All servicing activity associated with the site will be as per the existing situation. Refuse is proposed to be located on the ground floor.

We enclose a Transport Statement, prepared by Stantec, which demonstrates the following:

- The site is located in a highly sustainable location in Reading, as a result of the availability of footways and cycle routes in the vicinity of the site, and its proximity to a comprehensive network of public transport services.
- The proposed parking provision for the future residential development will broadly equate to 1.5 spaces per apartment. This exceeds Reading Borough Council's parking provision allowed for new developments, that would permit a maximum of 122 spaces based on the site being located in Zone 2 of the parking policy zonal plan.
- The level of parking remains unchanged from the current office uses and therefore does not present any severe impact above that of the existing conditions.
- The proposed cycle parking provision is in excess of the minimum requirements set by Reading Borough Council.
- The proposed residential development would generate a net reduction in trips to and from the site than the existing office development.

Therefore, there are no transport or highway safety reasons why Prior Approval should not be granted for the proposed change of use from office to residential at this site.

A Residential Travel Plan has also been prepared by Stantec, providing a long-term strategy to encourage sustainable travel by residents and other users of the proposed development.

Contamination Risks

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.

Flood Risks

The site is situated within Flood Zone 3a 'High Probability', as a result of the River Thames located to the north of the site. The accompanying Flood Risk Assessment prepared by Stantec concluded that the proposed development is safe and in accordance with the requirements of national and local planning policy.

The site is located in an area that will be defended by the planned EA Flood Alleviation Scheme (FAS) for North Reading and Lower Caversham. However, in order to fully address the flood risk of the site and mitigation measures, the assessment has ignored the FAS. The report states that the proposed mitigation strategy demonstrates that the development is safe through a number of measures as follows:

- Ground floor levels are to be raised to 38.66m AOD or above, providing a 300mm freeboard above the design 1 in 100 annual probability +35% allowance for climate change flood level and above the +70% scenario by 120mm;
- As a change of use, 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 change of use, 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 Council (RBC) Strategic Flood Risk Assessment (SFRA).

In light of the above, 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.

Noise Impacts

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 by 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.

Daylight

The application is supported by an Internal Daylight Analysis prepared by Point 2, to assess the predicted internal daylight levels of the proposed residential units.

The report concludes that all rooms will achieve the recommended ADF targets for their relevant room with and in the majority of instances the ADF levels are comfortably in excess of the recommendations. The report states that the proposed development will also receive good levels of sunlight, with 87.5% of southerly orientated rooms meeting BRE guidance.

Overall, it is considered that the design and layout of the proposed development has been developed to maximise the daylight and sunlight potential of the new units.

CONCLUSIONS

Our conclusions in respect of this application are as follows:

- The site meets the pre-qualifying criteria and is eligible for prior approval for change of use to residential;
- In terms of transport, the proposal would not result in any detriment to the operation of the local highway network and there is no transport and highways reason 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; and
- The proposed development will receive adequate internal daylight levels and there is no reason prior approval should not be granted for the scheme on internal daylight grounds.

It has been demonstrated that there is no conflict between the proposed change of use and the provisions of Class O of Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

In addition, the proposal meets the policies in the NPPF. Having regard to the matters set out in Part O.2 of the Order, the assessments submitted with this application demonstrate that there are no issues arising that would prevent the LPA from granting prior approval.

We trust that you have everything you require to determine our client's application. In the meantime, should you have any queries in respect of this submission or would like to discuss matters further, please do not hesitate to contact me or my colleague Sophie Ward.

Yours faithfully



Greg Dowden