

Design and access statement

Proposed extension to commercial area at ground floor, conversion of upper floors to form 3no. self-contained flats and associated first floor rear extension, rear dormer roof extension and front roof lights at 163-165 Caversham Road, Reading

Introduction

This design and access statement is written in support of the above proposal. The application follows a pre-app which was had with the council under ref: **161289/PREAPP**. Details of the advice received can be found in the appendix section of this report.

This report should be read in conjunction with the following documents: -

- **Town planning drawings by Rahul Taheem.**
- **Air Quality assessment by GEM Air Quality.**
- **Noise Assessment by In Acoustic.**
- **Flood Risk Standing Advice (FRSA) form**

Planning policy

The proposal has been considered in line with planning policy at a local national and local level.

The National Planning Policy Framework

The NPPF was published on 27th March 2012. There is a presumption in favour of sustainable development (Paragraph 14) which particularly applies to housing applications (paragraph 49). Local Planning Authorities should adopt a positive approach looking for solutions rather than problems (Paragraph 187). It also emphasises good design (Paragraph 56). It confirms the Government's commitment to delivering a wide choice of quality homes that people want and need, creating sustainable, inclusive and mixed communities (Paragraph 50).

Technical housing standards – nationally described space standard

This standard deals with internal space within new dwellings and is suitable for application across all tenures. It sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height.

Local Policy Framework

Reading Council's LDF Core Strategy (2008, Altered 2015), Sites and the Detailed Policies (2012, Altered 2015) Document and the Reading Central Area Action Plan (2009).

Site location and description

The application site relates to a pair of two storey mid terrace properties located on the west side of Caversham Road. The properties have been amalgamated into one of the years. The property is now vacant. Its last known use was A1 shop at ground floor level (cycle shop) with part shop/ancillary use at first floor level. The immediate area consists of buildings with retail and related uses at ground floor level and ancillary uses above or residential accommodation.

The application site is located within Flood Zone 2, an Air Quality Management Area and within the designated Reading Central Area. It is not within a Conservation Area and has no listed status.

Use

This application involves the change of use of the upper floors from commercial A1 to Residential C3. It is accepted that Local Policy CS27 of the Core Strategy seeks that the retail character of the centres identified within the Borough is retained as these are the main contributor to the vitality and viability of these Centres. Whilst other uses play a valuable role, there should not be an over-concentration of non-retail uses in one part of the Centre. The policy indicates that 50% of A1, A2, A3, A4, A5 and Sui Generis uses within each centre should be in A1 use.

The proposal would retain the A1 use at ground floor level and is considered to be in accordance with Policy CS27. In terms of the change of use of the upper floor(s), this was predominately used as ancillary space and not aimed at visiting members of the public. On this basis the loss of commercial space will not adversely impact the vitality of vibrancy of the local retail centre.

The change of use is further justified on the following grounds: -

- The existing building is oversized and underused.
- The upper parts of the building lends itself well to being converted into flats.
- The Council recognises that flat developments can make an important contribution to housing provision, in particular smaller units and that they can make more efficient use of urban land, particularly in town centre locations.
- The surrounding area is characterised by commercial uses at ground floor with residential above.
- The site has good access to local transport networks.
- The site is in close proximity to an array of local amenities, restaurants, shopping centres, schools, doctor's surgeries, and leisure facilities.
- The proposal is located close to parks and open space.

On the above basis the site is considered to be highly sustainable in line with NPPF and the principle of the development is acceptable.

Amount

The proposal provides accommodation for 3no self contained flats and retains the commercial use on the ground floor (which is to be increased). The proposed schedule of accommodation is as follows: -

Unit No.	Floor	Occupation	GIAm2
Commercial	Ground	A1 shop	164
1	First	1B 2P	57
2	First	2B 3P	62.5
3	Second	Studio 1P	42m2

Policy CS15 of the Reading Core Strategy (2008, altered 2015) states that the appropriate density and mix of residential development will be informed by the characteristics of the area in which it is located and accessibility. Given the town centre location it is considered that the proposed mix of 1 x 2 bed, 1 x 1 bed and 1 x Studio flat will be acceptable in this location.

The importance of ensuring that all new residential development is of a high quality with good living conditions has been a paramount consideration in the planning of the new residential flat units. It is noted that minimum floor area standards ensure an adequate amount of space is provided in residential development. In light of this, the proposed flat areas and room sizes adhere to and go beyond the technical housing standards.

It is acknowledged that the nationally described space standard sets a minimum ceiling height of 2.3 meters for at least 75% of the gross internal area of the dwelling so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space. All flats exceed the minimum height recommendation and the flat at second floor (within the roof) adheres to this standard.

In terms of amenity space, flat 1 has been provided with a screened terrace on top of the flat roof. Given the location of the site and access to nearby public amenities, it is considered that a case could be made for the development without any private amenity space provision in accordance with policy DM10.

Further to the above the scheme is able to support adequate provision of cycle parking which promotes sustainable transport methods and adequate refuse and recycling provision within convenient access of the street for collection. In regards to car parking none is proposed owing to the sites town centre location and good transport links.

Layout

The internal layout of the flats has been planned around the sites access arrangements. Internally all of the new flats have been designed to ensure that adequate ventilation and sunlight and daylight reaches habitable rooms. The following additional design criteria has governed the design: -

- A single bedroom has a floor area of at least 7.5m² and is at least 2.15m wide
- A double (or twin bedroom) has a floor area of at least 12m² and is at least 2.75m wide.
- A living room has a width of at least 3m.
- Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage. Any other area that is used solely for storage and has a headroom of 900-1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all.
- The minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area
- The minimum width of hallways and other circulation spaces inside the home should be 900mm.

- An accessible bathroom is to be provided in every dwelling

Scale and appearance

To the rear at ground floor an infill extension is proposed to the rear yard. This would not be visible from the public realm. Currently the existing shed and garage infill much of this area. There is substantial evidence of similar properties in the local area which have similar extensions as such it is not considered to be harmful to the local context. The same applies to the modest first floor infill extension. Both additions will be composed of materials to match existing. At roof level a dormer roof extension is proposed. This has been substantially reduced since the pre app based on officers advice. There are a number of examples of roof extensions along Newport Road and given that the dormer is not visible from the street it is considered not to have any negative impact.

Noise impact on development

The accompanying noise assessment demonstrates that the site is predicted to meet the requirements of the relevant British Standard and planning guidance, it is considered that noise does not present a constraint to the change of use to residential apartments at the site.

Air Quality - Increased exposure

Based on the outcome of the air quality assessment the current proposals are considered acceptable in terms of the potential air quality impacts across the development.

Access

In terms of inclusive design, the proposed residential unit will be compliant, where appropriate with Part M of the Building Regulations. The unit will also be compliant with life time home standards where applicable. The following has been considered through careful design considerations: -

- Enable ease of use of all entrances for the widest range of people.
- Enable convenient movement in hallways and through doorways.
- Enable convenient movement in rooms for as many people as possible.
- Enable people to have a reasonable line of sight from a seated position in the living room and to use at least one window for ventilation in each room.
- Locate regularly used service controls, or those needed in an emergency, so that they are usable by a wide range of household members - including those with restricted movement and limited reach.
- The provision of an accessible WC.

Sustainability

The proposal emphasises that development should make a contribution to minimising carbon dioxide emissions in accordance with guidance set in the London Plan. The relevant measures to be undertaken include: -

- High standards of insulation to reduce the amount of energy required to maintain comfortable temperature levels.
- The use of thermally massive materials, which represents the ability of materials to store heat or cool, is important as a means to control building temperatures and better manage day/night fluctuations.
- Efficient lighting and appliances will reduce energy consumption.
- Low temperature heating systems.
- The use of an energy efficient water heating system.
- Ensuring water consumption does not exceed 105 litres per head per day. The designs seek to minimise water use through a variety of techniques and technologies, including the fitting of water efficient toilets, taps, showers, dishwashers and washing machines.

Report by

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1 September 2016

Your contact is: **Matt Burns - Planning & Building Control**

Without prejudice

Dear Mr Taheem

161289/PREAPP - Proposed extension to commercial area at ground floor, conversion of upper floors to form 3no. self-contained flats and associated first floor rear extension, rear dormer roof extensions and front roof lights
163-165 Caversham Road, Reading

This is a pre-application response further to the above enquiry received on 12th July 2016. Apologies for the delay in providing this response.

Site description

The site relates to a pair of two storey mid terrace properties (amalgamated into one at some point) on the west side of Caversham Road. The property is in use as an A1 use at ground floor level (cycle shop) with part shop/ancillary office use at first floor level. The site is located within Flood Zone 2, an Air Quality Management Area and within the designated Reading Central Area. On this side of Caversham Road the building predominantly consist of building with retail and related uses at ground floor level, with ancillary uses above or residential accommodation.

Any planning application at the site would be considered within the context of the Council's LDF Core Strategy (2008, Altered 2015), Sites and the Detailed Policies (2012, Altered 2015) Document and the Reading Central Area Action Plan (2009). Supplementary Planning documents would also be applied where relevant, together with national guidance (the NPPF). Please use [this link](#) to view the local policies and guidance.

The proposal

The enquiry relates to a proposed single storey rear extension to the existing ground floor shop premises and conversion of the upper floor to form 3 self-contained flats with associated first floor rear extension, rear dormer roof extensions and front roof lights.

Relevant Planning History

92-00174-FUL - Alteration to existing first floor office and showroom area to create separate B1 use at first floor with independent access at ground floor level - Granted.

Appraisal

The main issues to be considered are:

- a) Principle
- b) Design and Impact on the Character of the Area
- c) Impact on Neighbours
- d) Mix of units
- e) Quality of Residential Accommodation/Sustainability
- f) Amenity Space
- g) Transport Issues
- h) Affordable Housing

a) Principle

Policy CS27 of the Core Strategy seeks that the retail character of the centres identified within the Borough is retained as these are the main contributor to the vitality and viability of these Centres. Whilst other uses play a valuable role, there should not be an over-concentration of non-retail uses in one part of the Centre. The policy indicates that 50% of A1, A2, A3, A4, A5 and Sui Generis uses within each centre should be in A1 use. The proposal would retain the A1 use at ground floor level and, as such, is considered to be in accordance with Policy CS27. In terms of the change of use of the upper floor(s), this is unlikely to be contentious (although should the lawful use of the upper floor(s) be Class B1, an assessment in line with Policy CS11 should be submitted with your application).

It is noted that small part of the existing retail floorspace to be retained would be lost as part of the proposal to create a communal entrance, bin and cycle stores to the proposed residential units above. Notwithstanding this the retail function would be retained to the large majority of the floor space with further commercial floor space proposed to the rear of the building. It is not considered that the proposed ground floor front access and stores would be harmful to the vitality of Reading Centre.

The National Planning Policy Framework (2012) encourages the effective use of land by reusing land that has been previously developed (brownfield land) and seeks that all housing applications should be considered in the context of the presumption in favour of sustainable development. The accessibility of the site is considered acceptable for the proposed development (CS4 of the Reading Core Strategy 2008, altered 2015) and the principle of the use of the upper floors of the building as residential is considered acceptable, subject to the relevant material planning considerations below.

You are also advised to explore and clarify the lawful use of the upper floors of the building. The space may lawfully be Class A1 (as per the ground floor - as per your submission) or Class B1 (as per the planning history- but it is not clear whether this was implemented or not). Should you wish to receive a formal decision from the Council as to the lawfulness of the upper floor(s), you may wish to submit a certificate of lawfulness application (CLEUD) for our consideration. You may subsequently be

able to apply under the prior approval regime for solely the change of use of the upper floor(s) to a residential use - the The Town and Country Planning (General Permitted Development) (England) Order 2015 can be downloaded from the following link: http://www.legislation.gov.uk/ukxi/2015/596/pdfs/ukxi_20150596_en.pdf Under the prior approval regime the Local Planning Authority would only be able to consider a limited number of matters, as detailed in the legislation. Please also note the amended legislation from 6 April 2016 - <http://www.legislation.gov.uk/ukxi/2016/332/contents/made>

However, for the purposes of this pre-application response, it is assumed that a full application for planning permission (involving change of use and alterations) is envisaged.

b) Design and Impact on the Character of the Area

To the rear of the property the proposed single storey rear extension would not be readily visible from the street-scene. Whilst the extension would completely fill the area to the yard area to the rear of the property the existing rear detached garage and shed already fill much of this area. There is also evidence of similar rear extension to nearby properties within this terraced row and as such the rear extension is not considered to be harmful to the character of the host property or surrounding area. Similarly there is evidence of flat roof first floor infill extensions to the two adjoining properties to the south within the terraced row such that this part of the proposal is also not considered to result in any significant harm to the character of the property of surrounding area. The three proposed small front roof lights are not considered to result in any harm to the character of the property or street-scene.

However, the three proposed integrated flat roof rear dormer roof extensions are large in size and would fill and dominate the rear roof space of the property. There does not appear to be evidence of dormer roof extensions to the rear of nearby properties within the terraces on this side of Caversham Road. It is my view that the large rear dormer extensions proposed would be harmful to the character of the host property and appear out of keeping with the visual amenities of the surrounding properties. I note that there appears to be some examples of rear dormer extensions to the residential dwellings to the rear of the site on Newport Road, however given the absence of any dormers to the rear of properties within the terraced row along Caversham Road I considered that the introduction of these dormer roof extensions - principally for the sole purpose of accommodating a new residential unit - would appear as incongruous additions within the character and appearance of this row of properties and this element of the proposal would not be supported by officers, as being in conflict with Policy CS7 of the Core Strategy 2008, 2015 and Policy RC5 of the Reading Central Area Action Plan 2009.

c) Impact on neighbours

As the adjacent properties either side are in commercial use at ground floor level I do not consider that the proposed single storey rear extension would result in any adverse harm to the adjacent occupiers. With regard to the first floor rear and rear dormer roof extensions I do not consider that these elements of the proposal would result in any undue loss of light or privacy.

The site is located on a busy road and The Council's Environmental Protection Officers has raised concerns regarding the noise impact on the proposed development and noise transmission between dwellings, as follows:

Noise impact on development

A noise assessment would be required to be submitted in support of an application for new residential proposed in this location.

The noise assessment will be assessed against the recommendations for internal noise levels within dwellings and external noise levels within gardens / balconies in accordance with BS 8233:2014 and WHO guidelines for Community Noise. The report should identify any mitigation measures that are necessary to ensure that the recommended standard is met.

Where appropriate, the noise assessment data should also include noise events (L_{AMax}) and the design should aim to prevent noise levels from noise events exceeding 45dB within bedrooms at night. Noise levels above 45dB are linked with sleep disturbance.

Internal noise criteria (taken from BS8233:2014)

Room	Design criteria	Upper limit
Bedrooms (23:00 to 07:00)	<30dB L _{Aeq} ,8hour	
Living rooms (07:00 - 23:00)	<35dB L _{Aeq} ,16hour	
Gardens & Balconies	<50dB L _{Aeq} ,T	<55dB L _{Aeq} ,T

The proposed development is by a busy road so a noise assessment will need to be submitted with the full application.

It may be possible though clever design to reduce the need for additional noise mitigation measures, for example, ensuring that noise sensitive rooms are located on the quieter façades and bathrooms, kitchens, hallways and cupboards etc on the noisiest facades.

Noise mitigation is likely to focus on the weak point in the structure, ie. the glazing. Given that the acoustic integrity would be compromised should the windows be opened, ventilation details must also be provided, where mitigation relies on closed windows. Ventilation measures should be selected which do not allow unacceptable noise ingress and should provide sufficient ventilation to avoid the need to open windows in hot weather; however non-openable windows are not considered an acceptable solution due to the impact on living standards.

The mitigation measures, if agreed, would be required to be installed in accordance with the approved specifications prior to occupation.

Noise between residential properties - sound insulation of any building

To minimise the disturbance by noise of future residential occupiers of the flats and its effect on neighbouring residents, residential accommodation must be designed and constructed or converted so as to achieve the insulation requirements set out in Building Regulations Approved Document E.

Air Quality - Increased exposure

The proposed development is located within an air quality management area that we have identified with monitoring as being a pollution hot-spot (likely to breach the EU limit value for NO₂) and introduces new exposure / receptors. An assessment and/or mitigation measures should be provided as part of the application.

The applicant will need to demonstrate sufficient mitigation measures are implemented to protect the residents from the effects of poor air quality.

Where the development involves converting an existing building and allowing a buffer zone is not an option then it may be that other mitigation can be applied. In the first instance this would be to implement measures to reduce the level at the facade of the property by creating a barrier between the property and the carriageway, such as close boarded fencing or planting vegetation.

If this is not possible then locating habitable rooms away from the source of pollution or the use of mechanical ventilation with the inlet on the clean side of the property may be acceptable. This list of potential measures is by no means an exhaustive list.

Mitigation against increased exposure:

- Mechanical ventilation - inlets from the 'clean' side of the development, long term maintenance needs to be addressed
 - Buffer zones - consider increasing distance of the building façade from very busy roads
 - Habitable rooms - consider placing stairwells, corridors and bathrooms on the façade fronting pollution source
 - Mixed use - locate any sensitive uses on higher floors, allowing commercial use on lower elevations
 - Balconies - consider avoiding use in areas of exceedance, especially on ground and first floor level
 - Non-opening front windows - this should only be considered in certain circumstances, needs to be balanced against loss of freedom for future occupants
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Reading Borough Council's Air Quality Policy DM19 requires that developments have regard to the need to improve air quality and reduce the effects of poor air quality through design, mitigation and where required planning obligations to be used to help improve local air quality.

d) Mix of Units

Policy CS15 of the Reading Core Strategy (2008, altered 2015) states that "Developments should provide an appropriate range of housing opportunities in terms of a mix of housing types, sizes and tenures, in accordance with the findings of a housing market assessment." The supporting text to this policy states that the provision of at least an element of family housing in all developments is a priority, based on the findings of the Berkshire Strategic Housing Market Assessment (2007) (SHMA). The policy also states that the appropriate density and mix of residential development will be informed by the characteristics of the area in which it is located and accessibility. It is considered that the proposed mix of 2 x 2 bed and 1 x 1 bed flat be acceptable in this location.

e) Quality of Residential Accommodation/Sustainability

In my opinion bedroom 2 to flat 3 in the roof space would not provide an acceptable standard of living accommodation. Given the sloping roof to the front of the building, much of the floor space would not be useable resulting in cramped and contrived space for this habitable room (and therefore contrary to Policy DM4).

All other rooms appear to be of suitable size and appear to be served by suitable outlook and daylighting.

The proposal would need to demonstrate how it had been designed to incorporate measures to adapt to climate change in accordance with Policy DM1: Adaptation to Climate Change of the Sites and Detailed Policies Document and also, prior to occupation, provide a final BREEAM Domestic Refurbishment certificate demonstrating that the dwellings achieve at least a 'Very Good' rating. It will be required for a *BREEAM Domestic Refurbishment pre-assessment* to be submitted at the time of any future application.

f) Amenity Space

It does not appear that the proposed flats would benefit from any amenity space. Given the location of the site and access to nearby public amenities, I consider that a case could be made for the development without any private amenity space provision (DM10).

g) Transport Issues

The site is located within the Zone 2, the primary core area but on the periphery of the central core area which lies at the heart of Reading Borough, consisting primarily of retail and commercial office developments with good transport hubs

The proposed development is located close to the junction of York Road and Caversham Road along which there are good public transport links to and from the town centre. The junction with Caversham and York Road is subject to no-waiting regulations 'at any time' which covers the top part of York Road which runs adjacent to the site. The remainder of York Road and the neighbouring roads is controlled by the Councils Permit Parking Scheme and falls in Zone 03R.

Therefore, a parking informative would be applied to prevent any future occupants of the development from obtaining a residents parking permit for the surrounding residential streets where parking is under considerable pressure. This will ensure that the development does not harm the existing amenities of the neighbouring residential properties by adding to the already high level of on street car parking in the area.

No car parking has been proposed in the plans submitted therefore in principal there are no objections given that no residents or visitors parking permits will be issued to this development. There is restricted parking on Caversham Road whereby vehicles are permitted to park for a maximum of 30 minutes.

Bin storage has been illustrated on the plans. This should be located no further than 15m from the access point of the site and should comply with Manual for Streets and British Standard 5906: 2005 for Waste Management in Buildings and should be located no further than 15m from the access point of the site to avoid the stationing of service vehicles on the carriageway for excessive periods.

In accordance with the adopted Parking SPD, the development is required to provide a minimum of 0.5 cycle parking spaces for each 1-2 bedroom flat which should be in a conveniently located, lockable, covered store. Plans submitted illustrate there will be provision for cycle storage for 6 cycles.

h) Affordable Housing

Notwithstanding the above concerns regarding roof extensions, were the proposal otherwise acceptable, you should note the following:

West Berkshire District Council and Reading Borough Council applied for a judicial review of the Secretary of State's Written Ministerial Statement (WMS) to Parliament in 2014 on changes to national planning policy. Those changes sought to exempt developments of 10 or less dwellings from planning obligations for affordable housing and social infrastructure contributions and to introduce a new measure known as the Vacant Building Credit.

The High Court handed down its judgment on the case on 31st July 2015. The High Court found in favour of the challenge by the local authorities and quashed the amendments to the NPPG. The Secretary of State appealed the judgment and the Court of Appeal has now quashed the decision of the High Court.

Reading Borough Council has been considering its options for implementing its affordable housing policy in the light of this decision.

At its meeting of the Strategic Environment Planning and Transport Committee on 13th July 2016, the Council discussed the outcome of the Court of Appeal's decision on its challenge (the report can be found here:

http://www.reading.gov.uk/media/5651/Item09-SEPT-C-Report-on-C-of-Appeal-judgement-05-16/pdf/Item09_SEPT_C_Report_on_C_of_Appeal_judgement_05_16.pdf).

Having considered its options, the Committee agreed the following as the basis for determining planning applications where Policy DM6 of the SDPD is relevant:

To implement Policy DM6 as currently adopted in the SDPD but excluding proposals that solely involve the conversion of an existing property, where the conversion involves the provision of 10 or less dwelling units (i.e. not HMOs), or the replacement of dwellings by the same number of replacement dwellings where there is no net increase.

Significant rear dormer roof extensions are proposed to the rear of the roof space of the property without which it would not be possible to incorporate a third unit within the building. On this basis an affordable housing contribution is likely to be sought in accordance with Policy DM6, were this proposal to be submitted as a planning application and otherwise able to be supported.

The contribution would be calculated based on the price a Registered Provider e.g. housing association would pay for the unit. This is assumed to be 50% of Gross Development Value (GDV). Therefore for example if the average GDV of the scheme was £400,000, the affordable housing contribution from the developer would be the remaining 50% of the value of 0.1 units: $0.5 \times 0.1 \times 400,000 = £20,000$. To enable the precise figure for this proposal to be decided, please provide a GDV valuation of the proposed development; based on the current market with any future submission (please submit valuations from more than one suitably qualified valuer). The contribution sought would equate to 5% of the GDV of the scheme.

Should you not wish to / be able to make a contribution towards affordable housing, a viability assessment would be required to evidence this, which would be subject to review by the Council's

Valuations team during the course of the application (there would be a separate fee - currently £1000 - for this). Please see the validation requirements for more details about the type and nature of information required at application stage regarding affordable housing / viability - all such information would be required in advance of the validation of any application at the site.

Community Infrastructure Levy

From April 1st 2015 development will be subject to the Council's Community Infrastructure Levy (CIL), and this will include charges for residential development.

Further information on CIL is available to view on the Council's website at: <http://www.reading.gov.uk/businesses/Planning/planning-policy/community-infrastructure-levy/>

Should the proposal be CIL liable, the amount to be charged is non-negotiable. You will be required to submit a completed CIL form at the time of any application. In practice, you are advised that in proposals such as this, CIL effectively replaces previous S106 requirements for leisure & education (no longer sought). Affordable Housing falls outside of CIL and is a separate matter still secured via s106.

Other matters

Please note that officers are aware of past evidence of Japanese Knotweed along the common boundary with the site to the rear. You are strongly advised to remove any traces of the weed through recognised and approved methods, whether you choose to pursue this proposal or not.

This proposal will have implications for the Building Regulations, which have not been taken into account in this response.

The site is within Flood Zone 2 and in making any planning application, you should include a Flood Risk Standing Advice (FRSA) form.

Conclusion

For the reasons above set out above, principally the concerns relating to the impact of the proposed large rear dormer roof extensions upon the character of the host building and surrounding properties and poor standard of residential accommodation to be provided to bedroom 2 of flat 3 within the roof space of the building, it is my opinion that officers would be unable to support an application for the proposed development in its current form. Officers are not ruling out the principle of development for residential uses on the upper floors and you are advised to explore possible prior approval options at the site too.

Whilst not encouraged, if you were to submit an application of the nature shown at present, please note the validation requirements set out in the Council's Validation Checklist (updated July 2015). Please refer to the [Council's website](#) for details.

This advice is given on a without-prejudice basis and not all policies have been considered. This advice is in good faith and will not over-ride the formal consideration of a planning application by the Council. If you wish to discuss the contents of this letter, please contact me on the number given above.

Yours sincerely,

Matt Burns

Matt Burns

North / Central Team