

PLANNING STATEMENT

IN SUPPORT OF AN APPLICATION FOR A S73 MINOR-MATERIAL
AMENDMENT TO APP. NO. 210902 FOR THE “CONSTRUCTION OF
A NEW RESIDENTIAL FLOOR ABOVE THE EXISTING ROOF LEVEL
TO CREATE 8 RESIDENTIAL UNITSS”

ALEXANDER HOUSE, 205-207 KING’S ROAD,
READING, RG1 4LS

PREPARED ON BEHALF OF APPLICANT:

BMR PROPERTY GROUP

DECEMBER 2023

HCH LLP

Prepared by:
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1. INTRODUCTION

- 1.1. This planning statement has been prepared by Hooper Curry Hamilton (HCH) LLP on behalf of BMR Property Groups ("the Applicant"). It accompanies a planning application submission for a Section 73 Minor-Material Amendment (MMA) to planning permission no. 210902 for the "*Construction of a new residential floor above the existing roof level to create 8 residential units*" at Alexander House, 205-207 King's Road, Reading RG1 4LS ("the Application site"). This is submitted to deliver the proposed minor changes listed below in Section 3.
- 1.2. This statement takes the following form: a brief description of the Application Site and Surrounding Area in Section 2; Description of the Development in Section 3, Planning History in Section 4, Planning Policy is referenced in Section 5. Planning Consideration is provided in Section 6 and the Conclusion in Section 7.

2. SITE AND SURROUNDING AREA

- 2.1. Alexander House 205-207 King's Road, Reading RG1 4LS lies to the north of the King's Road adjacent to its junction with Rupert Street in Reading town centre. It is a short 10-minute walk from the main retail and leisure offering in the town centre at Broad Street and the Oracle shopping centre. Reading is a strategic regional town in the Thames Valley/ M4 corridor with a population of circa 200,000 people.
- 2.2. The town is located approximately 67km (42 miles) west of London, 44km (27.5 miles) south of Oxford and 27km (17 miles) east of Newbury and lies within an 8-minute drive of the M4. The property is situated approximately 1.6km (1.0 mile) to the east of Reading Railway Station which provides excellent links to the south-west of England, with regular fast services to London Paddington taking just 25 minutes and offering up to 16 trains per hour.



3. DESCRIPTION OF THE DEVELOPMENT

3.1. The existing permission no.210902 is for the “*Construction of new residential floor above existing roof level to create new residential use Class C3 to comprise 8 residential units*”. This planning permission forms part of a suite of planning permissions and prior approvals, which cover the application site and allow for the comprehensive conversion of the existing office building to residential use. The permissions that cover the building are as follows:

3.1.1. *Prior Approval for the Main Building Floor Grd-1st - App. No.: 230400*

Change of use from Class E (offices) to C3 (dwelling houses) to comprise 22 Flats. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015. Decision Date: 17/05/2023

3.1.2. *Planning Permission for Roof Alterations and External Elevation Work App. No.:210885*

Roof alterations and external elevation works to facilitate introduction of natural light into the roof area. Decision Date: 24/08/2021

3.1.3. *Prior Approval for Roof Storey and Additional Residential Units at Grd/1st - App. No.: 210906*

Change of use from office use Class B1a to residential use Class C3 to create 13 new residential dwellings. These are created 11 within the roofspace of the building and a further 2 units on Ground and 1st Floor. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015. Decision Date: 28/07/2021. Allowed at Appeal 22/11/22.

3.2. This S73 MMA submission is made to deliver the following minor-material changes to the permission no. 210902:

3.2.1. Correct a minor error on the existing and proposed building heights listed, due to an error on the building survey at the original planning stage. The error incorrectly labelled the existing loft floor at 6.600m when it should have been 7.600m. The proposed elevations have also been updated and with the additional storey in place, the final roof level will be 13.85m, rather the 12.00m annotated on the approved plan.



- 3.2.1.1. Amendment to proposed fenestration to subdivide the large panels to comply with building regulations. The subdivided areas are shown on the enclosed window detail drawings listed overleaf. The approach to the fenestration will now introduce fixed spandrel glazed panels.
- 3.2.1.2. Removal of the roof terrace to reduce the envelope of the building, to offset the minor increase in height. The roof terrace would also require the introduction of a secondary escape from the roof space as part of the fire strategy, which was not identified at planning stage, and would have an unacceptable impact on the height and visual impact of the building.
- 3.2.1.3. The introduction of an additional brick detailing in the form of red brick banding running just below the proposed additional storey. This will tie the building into the two existing brick bands which are lower down the building and were not previously shown on the approved existing elevations.



Image 1: Brick Banding missing from Approved Existing elevation



Image 2: Proposed addition brick band

- 3.2.1.4. A revised escape stair, which now proposes a flat roof where a sloping roof was previously approved, as it has not been possible to deliver the required head heights to make this a usable stair.
- 3.2.1.5. An updated area schedule as below which shows marginal changes from the approved schedule. This proposes a NIA of 426.9sqm and 550.8sqm GIA (compared to 402sqm and 543sqm respectively previously approved).

NIA Per Apartment				
Floor	Unit	Unit Type	Area (sqm)	Area (sqft)
TF	36	2B 4P	70.79sqm	761.95sqft
TF	37	1B 1P	56.15sqm	604.38sqft
TF	38	2B 3P	68.52sqm	737.59sqft
TF	39	Studio	38.90sqm	418.77sqft
TF	40	2B 3P	67.86sqm	730.43sqft
TF	41	Studio	42.66sqm	459.22sqft
TF	42	Studio	40.77sqm	438.84sqft
TF	43	Studio	41.28sqm	444.38sqft
Total			426.9sqm	4587.9sqft



- 3.3. The application is being made under Section 73 of the Town and Country Planning Act 1990 to vary Condition 2 of planning permission no. 210902, which lists the approved drawings. The drawings are listed below with the proposed revised drawings numbers represented in bold.

Approved Plans Listed on Decision Notice

AHR_PA2 001_Existing Location Plan

AHR_PA2 002_Existing Site Plan

AHR_PA2 003_Existing Basement Ground Floor Plans

AHR_PA2 004_Existing First Loft Floor Plans

AHR_PA2 005_Existing Roof Plan

AHR_PA2 006_Existing Elevations A B replaced with 2022-258-206

AHR_PA2 007_Existing Elevations C D replaced with 2022-258-207

AHR_PA2 008_Existing Sections AA BB replaced with 2022-258-208

AHR_PA2 009_Existing Contextual Elevations A B replaced with 2022-258-209

AHR_PA2 103_Proposed Basement Ground Floor Plans

AHR_PA2 106 Rev 0 – Proposed roof terrace and roof floor plans replaced with 2022-258-306

AHR_PA2 101 Rev A - Proposed Location Plan

AHR_PA2 102 Rev A - Proposed Site Plan

AHR_PA2 107 Rev 0 – Proposed Elevation A & B replaced with 2022-258-307

AHR_PA2 108 Rev 0 – Proposed Elevation C & D replace with 2022-258-308

AHR_PA2 109 Rev A - Proposed Section AA&BB replaced with 2022-258-309

AHR_PA2 110 Rev A - Proposed Contextual Elevations A&B replaced with 2022-258-310

Additional Plans

2022-258-211 Rev A (Window Detail)

2022-258-212 Rev A (Window Detail)

2022-258-213 Rev A (Window Detail)

AHR_PA2_105 – Proposed Third Floor Plan replaced with 2022-258-305



- 3.4. This submission is made simultaneously with a S73 Minor-material Amendment to planning app. ref. 21088: Roof Alterations and External Works permission to Alexander House. This is to deliver minor amendments to the proposed roof floor structure and the window openings to roof and main building.
- 3.5. Further section 96a Non-Material Amendments (NMA) will then be made to update the attached drawings to the prior approval application no. 210906 – “*Change of use from office use Class B1a to residential use Class C3 to create 13 new residential dwelling*” for the roof storey and to prior approval application no. 230400 – “*Change of use from Class E (offices) to C3 (dwelling houses) to comprise 22 Flats*” for ground and 1st floor of the existing building.

4. PLANNING POLICY

- 4.1. The enclosed proposals have been considered against the following relevant planning policies.

Reading Borough Local Plan November 2019

CC1: Presumption in Favour of Sustainable Development

CC2: Sustainable Design and Construction

CC6: Accessibility and the Intensity of Development

H1: Provision of Housing

H2: Density and Mix

H3: Affordable Housing

H5: Standards for New Housing

TR1: Achieving the Transport Strategy

TR3: Access, Traffic and Highway-Related Matters

TR5: Car and Cycle Parking and Electric Vehicle Charging

RBC Supplementary Planning Documents

Revised Parking Standards and Design SPD (2011)

Affordable Housing SPD (2013) / Draft Affordable Housing SPD (October 2020)

Revised SPD on Planning Obligations under Section 106 (2015)

Sustainable Design and Construction SPD (2019)

DCLG Technical housing standards – nationally described space standard (2015)



5. PLANNING HISTORY

5.1. The relevant planning history of the application site is as follows.

App. No.: 231062

Application for approval of details reserved by condition 7 (Noise assessment) of application 210902

Decision Date: 29/08/2023

App. No.: 230905

Discharge of condition 15 (habitat enhancement scheme) of planning permission 210902, as granted on 10/11/2022.

Decision Date: 23/08/2023

App. No.: 230819

Discharge of condition 5 (Design stage SAP submission) of planning permission 210902, as granted on 10/11/2022

Decision Date: 15/08/2023

App. No.: 230671

Application for approval of details reserved by condition 3 (schedule of materials) of Application 210902

Decision Date: 16/05/2023

App. No.: 230656

Application for approval of details reserved by condition 4 (Construction Environmental Management Plan and Construction Phase Plan) of Application 210902

Decision Date: Under Consideration

App. No.: 230400

Change of use from Class E (offices) to C3 (dwelling houses) to comprise 22 Flats. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.

Decision Date: 17/05/2023



App. No.: 162057

Erection of basement and 4 - 7 storey building comprising 56 (30x1, 18x2 & 8x3-bed) residential units (Class C3) with associated parking and landscaping, following demolition of existing basement and 2 storey office building (Class B1a)

Decision Date: 17/05/2017

App. No.: 901103

Erection of two storey office block with semi-basement car park for 50cars and two storey block of 7 flats with associated parking.

Decision Date: 23/08/1990

App. No.: 190160

Demolition of existing office building and construction of new 182 bed student accommodation development, over 7 storeys of accommodation plus lower ground floor, together with ancillary landscaping, parking and amenity space

Decision Date: 17/07/2019

App. No.: 210902

Construction of new residential floor above existing roof level to create new residential use Class C3 to comprise 8 residential units.

Decision Date: 10/11/2022

App. No.: 210885

Roof alterations and external elevation works.

Decision Date: 24/08/2021

App. No.: 230820

Non-material amendments to permission 210902 (granted on 10/11/22 to provide 8 residential units above the existing roof level) to increase the height of the building by 1.7m, provide a further fire escape access point at roof level adjacent to the north elevation of the Rupert Street elevation and alter all windows and doors to all floors of the building.

Decision Date: 24/07/2023 WITHDRAWN



App. No.: 210536

Change of use from office use Class B1(a) to use Class C3 to comprise 22 residential units. Prior Notification under Class 0, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015

Decision Date: 25/06/2021

App. No.: 210906

Change of use from office use Class B1a to residential use Class C3 to create 13 new residential dwellings. These are created 11 within the roof space of the building and a further 2 units on Ground and 1st Floor. Prior Notification under Class 0, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.

Decision Date: 28/07/2021

6. PLANNING CONSIDERATION

Design, Impact on the Character of the Area, and Street Scene

- 6.1 Policy CC7: Design requires all development to be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.
- 6.2 The two nearby developments, No. 209-211 King's Road and No. 201-203 King's Road, establish the character of the street scene which consists of contemporary fenestration, presence of balconies and non-gable roofs. The consented scheme enhances the street scene at King's Road by delivering a modern flat roofed top storey with a set-back surrounding private terraces for all proposed residential units, which compliments the existing character of the area.
- 6.3 The consented envelope represented an appropriate balance between maximising the potential of the site for residential development whilst not representing an overdevelopment of the site. The proposal did not adversely harm the character of the surrounding streetscape or give rise to an overly dominant or incongruous addition to the immediate area and was determined to be compliant with Policies CC8, H10 and H11.



- 6.4 With the correction to the building survey, the correct contextual relationship is shown on submitted drawing 2022-258-310 Proposed Contextual Relationship A B. This clearly demonstrates that, when presented correctly, the additional storey remains below the heights of the buildings at 209-211 and 201-203 King's Road.
- 6.5 It is considered that the correction to the building survey does not undermine the conclusions of the existing planning permission, and the completed building will still be appropriate to the surrounding character and acceptable within the street scene. However, the impact of the proposed correction on Saxon Court to the rear of the application site must be appropriately considered, which is undertaken in the next section.
- 6.6 The proposed amendment to the fenestration to subdivide the large panels with the addition of spandrel glazed panels is a minor change to the scheme when viewed from street level, which would not change the design quality of the scheme to any material nature.

Impact on Neighbour Amenity

- 6.7 Residential amenity is assessed against Policy CC8, which requires developments to not cause a detrimental impact on the living environment of existing properties in terms of privacy and overlooking; access to sunlight and daylight; visual dominance and overbearing; harm to outlook; noise and disturbance; artificial lighting; vibration; dust and fumes; smell; and crime and safety.
- 6.8 During the determination of application no. 210902, it was made clear that the impact of the proposed additional storey on Saxon Court to the rear was among many material considerations in the establishing the acceptability of the proposal. This has also been a consideration when assessing the impact of the slight increase in height of the additional storey. When assessing the impact it is important to consider the following:
- 6.8.1 The existing building has not actually increased in height; therefore, the actual physical impact will only be felt by the 0.85m increase in the height of the additional storey and this was to address a floor-to-ceiling height, which needed to be slightly increased to deliver appropriate internal headroom. This increase is not material.



- 6.8.2 The removal of the roof terrace also removes the privacy screen from around the roof, which reduces the bulk of the building and offsets any minimal increase in height. This also removes a management issue, which was a previous Council concern (see para 6.12).
- 6.8.3 It has not been possible to deliver the diagonal roof of the escape stair core and it has been necessary to add a flat roof to the core in order to allow for additional steps and a refuse store. This requirement has arisen out of detailed design. However, it is clear from that the revised envelope will not cause a detrimental impact upon or visually dominate the property at Saxon Court as had previously been feared. Indeed, even if there is a slight increase in impact as a result of this updated detailed design, this impact would be outweighed by the delivery of the final scheme, contribution to housing numbers in a sustainable location and improvements to the proportions of the existing building in design terms. Therefore, on balance, the proposed building remains acceptable and no significantly harmful amenity impacts would occur in compliance with adopted policy CC8.

Amenity of Future Occupiers

- 6.9 Policy H10 (Private and Communal Outdoor Space) seeks that residential developments are provided with adequate private or communal outdoor amenity space, and it is against this policy that the proposed removal of the roof terrace should be assessed.
- 6.10 The proposal to remove the terrace is required due to the following reasons:
- 6.10.1 The introduction of the roof terrace would require a secondary escape under fire regulations which in turn would require a much larger lift overrun on the side of the building closest to Saxon Court. It is considered that the introduction of this would represent an overbearing structure in this location given the sensitivity of this relationship.
- 6.10.2 The removal of the roof terrace would help reduce the perceived envelope of the building and help adjust for the effective additional height.



- 6.11 It should be noted (and it is relevant to this consideration) that given the provision of private terraces for all proposed dwellings, the roof terrace was never a requirement by the Council to meet the terms of policy H10. It was offered by the Applicant. In fact, as confirmed in the planning officer report for planning application no. 210902, the Council considered the roof terrace to be more of a liability than an asset to the scheme. Consequently, planning condition 16 requires the submission and agreement of a management plan for the terrace before its use can commence to address this concern. The removal of the terrace now addresses and removed this previous management concern.
- 6.12 It is therefore considered that the removal of the proposed roof terrace does not cause planning harm to the proposal, that the provision of private terraces for all proposed residential dwellings meets the requirement of adopted policy and that this amendment should be allowed.

7. CONCLUSION

- 7.1 On the basis of the enclosed information, it is considered that the proposed minor amendments would not strike at the heart of the original proposals granted planning permission under app no. 210902.
- 7.2 The proposed residential dwellings still deliver a high standard of accommodation and they provide acceptable levels of private amenity space.
- 7.3 In terms of height scale and massing, the scheme is still acceptable given that it is of a lower scale than both surrounding existing buildings even with the height adjustment. The relationship with Saxon Court to the rear is still acceptable and does not cause planning harm to the amenity of that building. The enclosed proposals are compliant with both the adopted Development Plan and the National Planning Policy Framework (2019) and should be considered acceptable in planning terms.