



01325 469 236



info@elgplanning.co.uk



www.elgplanning.co.uk

Reading Borough Council,
Planning,
Reading Borough Council Civic Offices,
Bridge Street,
Reading,
RG1 2LU

Our Ref. 24/391

5th November 2024

Dear Sirs,

RE: PRIOR NOTIFICATION OF THE CHANGE OF USE FROM COMMERCIAL TO FORM 31NO. RESIDENTIAL APARTMENTS AT 40 CAVERSHAM ROAD, READING, RG1 7EB

We write in relation to the submission of a prior notification application to Reading Borough Council (RBC), under the provisions of Class MA of the Town and Country (General Permitted Development) (England) (Amendment) Order (GPDO) 2015 (as amended), for the proposed change of use of the above property to form residential apartments (C3).

Site Context

The application relates to the aforementioned property; a contemporary four-storey office block with undercroft parking, which lies immediately east of Caversham Road in Reading town centre. In terms of the local context, adjacent land uses are predominantly residential to the north east, east, south, and - beyond Caversham Road - west. Some commercial properties also exist nearby, as expected in a town centre location; this includes Premier House - an office block constructed in the late 1980's - located opposite the northern elevation of the application property, separated by Stanshawe Road.

With regards to access, the main (pedestrian) entrance and vehicular access to the building are both located on Vachel Road to the south. As a 'dead end', Vachel Road does not provide any access onto or from the adjacent Caversham Road, which is an A-road.

To confirm, the application property is not listed or lie within a conservation area.

In relation to planning history, applications at the building over the last ten years have been related to external alterations, refurbishment, and signage.

Proposed Scheme

This application proposes the change of use of the property to form 31no. apartments, as shown at Figure 1 overleaf.

Gateway House, 55 Coniscliffe Road, Darlington, Co. Durham, DL3 7EH

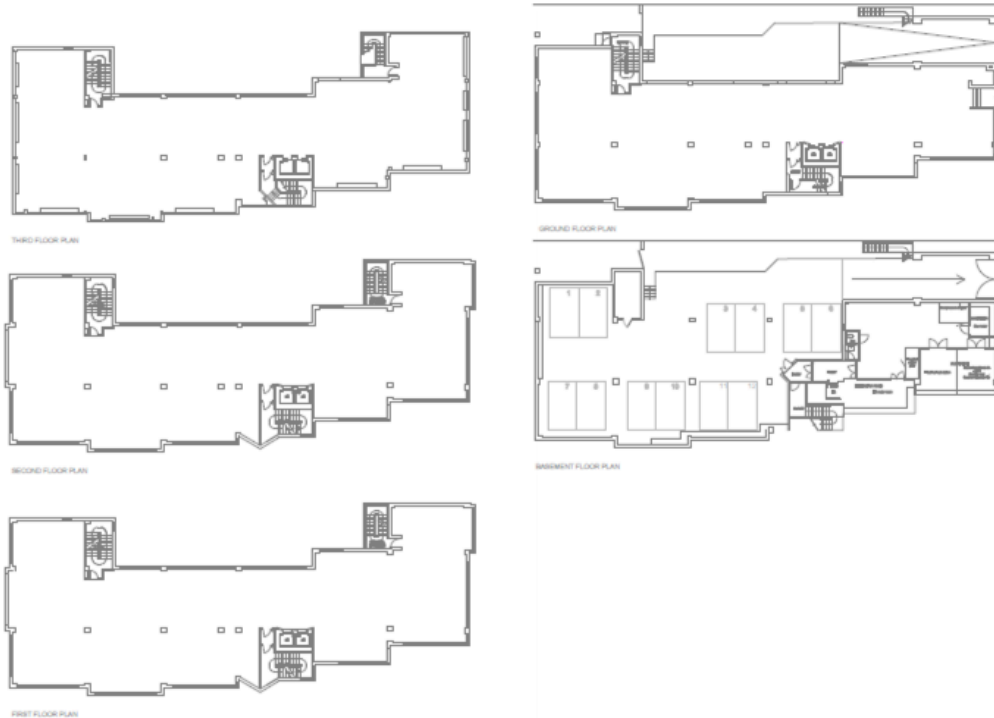


England & Lyle Ltd trading as: ELG Planning

www.elgplanning.co.uk

VAT Registration No: 660033965
Registered in England No: 3409505
Registered Address: Gateway House (as above)

Existing floor plans



Proposed floor plans – green denotes one-bed apartments, and yellow denotes two-bed apartments

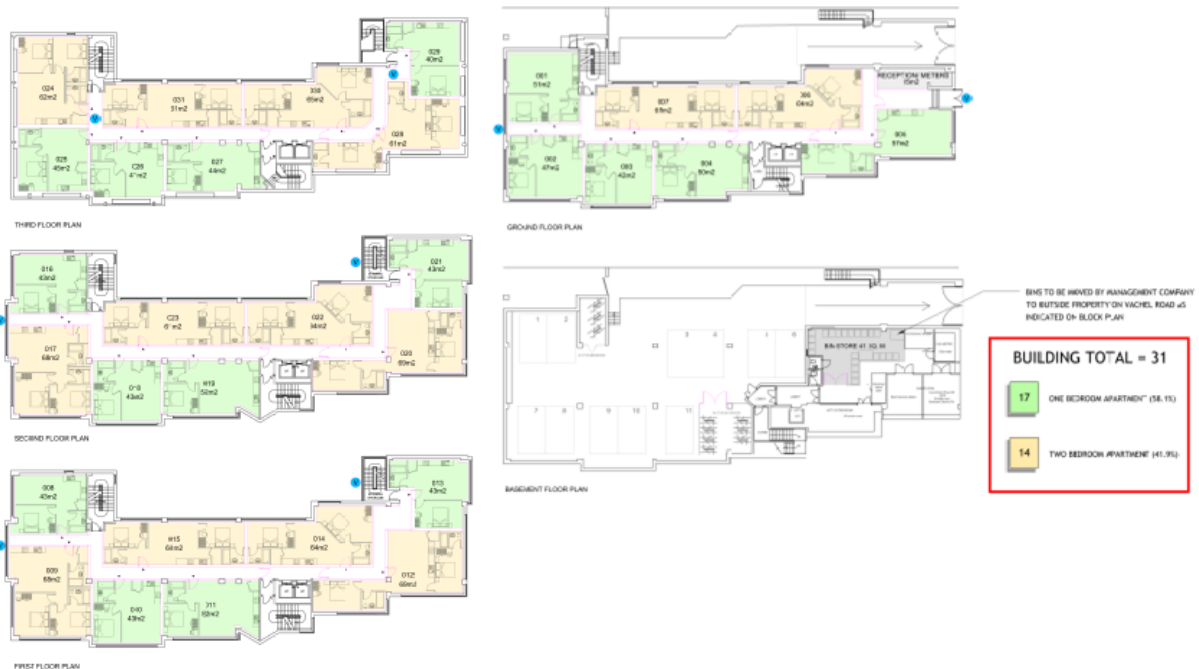


Figure 1: Existing and Proposed Floor Plans

The 2015 GPDO (as amended) is clear that a change of use from commercial to residential is only permitted where it meets the provisions of Class MA. As per these provisions, the building subject

to this application:

- Was last occupied as an office building;
- Does not form part of:
 - A safety hazard area; or
 - A military explosives storage area;
- Is not:
 - A listed building or falls within the curtilage of a listed building;
 - A scheduled monument or lie in land within its curtilage;
 - Part of a site of special scientific interest; or
 - On a site occupied under an agricultural tenancy;
- Does not lie 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.

Given the above, the proposed change of use from commercial to residential clearly constitutes permitted development under the provisions of Class MA. This is subject to the condition that prior to development commencing, an application is made to the Local Planning Authority (LPA) (in this instance RBC) for their determination as to whether their prior approval is required in respect of the:

- Transport and highways impacts of the development, particularly to ensure safe site access;
- Flooding risks in relation to the building;
- Contamination risks in relation to the building;
- Impacts of noise from commercial premises on the intended occupiers of the development;
- Provision of adequate natural light in all habitable rooms of the dwellinghouses;
- Impact on the 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;
- Impact on the local provision of the type of services lost, where the development involves the loss of services provided by a registered nursery or a health centre maintained under section 2 or 3 of the National Health Service Act 2006; and
- Fire safety impacts on the intended occupants of the building, where the development meets the fire risk condition.

In addition, paragraph 3 (9A) of the GPDO is also explicit that it does not permit dwellings that do not comply with Nationally Described Space Standards.

Prior Approval Considerations

Transport and highways impacts

This application is for a change of use from commercial to create 31 no. apartments, with 11 no. car

parking spaces retained at basement level. This represents a reduction of 1no. car parking space from those existing presently, which is proposed in order to create an additional cycle store. To confirm, the car parking spaces will be made available to residents on a 'first come first served' basis.

Although the above amount (of car parking) is 5no. less than the 0.5no. spaces per 1- 2no. bed apartments in Zone 1 set out in RBC's Revised Parking Standards and Design Supplementary Planning Document (SPD)¹ (16no. would be required based on the standards), the SPD states the following in respect of Zone 1 (underlined is ELG emphasis):

'This area lies at the very heart of Reading Borough, consisting primarily of retail and commercial office developments, with limited residential. The area is defined as having the best transport hubs, with both the main railway station and also bus interchanges at the station and within Friar Street and other streets surrounding the town centre. This area also contains the largest proportion of public car parking spaces. Further development in this area is anticipated to be of a similar nature to the existing provision, but will include some high-density residential. Typically retail units generate shorter term parking and in core areas commercial office facilities can be served well by rail and bus links.'

Based on the accepted sustainable nature of the location, it is not considered that a shortfall of 5no. spaces would give rise to any unacceptable transport or highways impacts.

With respect to cycle parking, 2no. secure cycle stores will be provided within the current car park - at basement level - as shown on the site plan, one of which is existing. Together, these will provide capacity for 20no. cycles, which is in excess of the 16no. required based on the SPD standards.

Turning to refuse collection, the proposed bin store will be located within the basement of the building, with bins moved to Vachel Road by the management company on the day of collection. This is understood to be the same arrangement as at present, so any continuation of existing arrangements is considered acceptable.

Taking all of the above into account, it is evident that the overall highways impact of the proposals will be low, and further weight to the above analysis is provided by the Transport Statement by TPS Consultants that has been provided as part of the application.

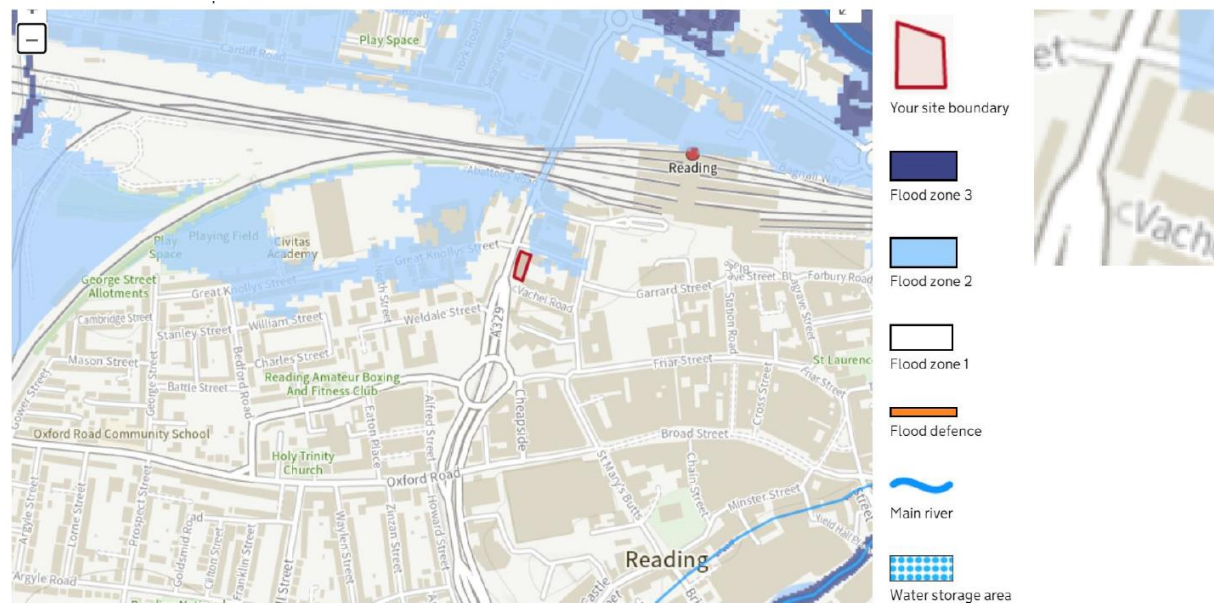
Flood risk

As shown at Figure 2 oveleaf, the building is located within Flood Zone 1. This means it is not identified as being at risk of flooding from rivers or seas.

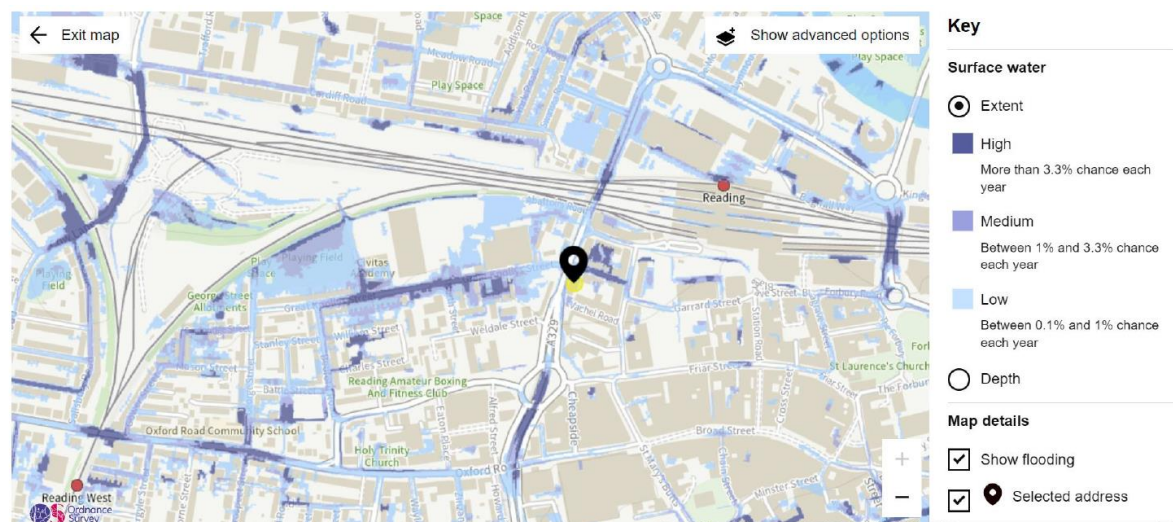
With regards to surface water flooding, a small area along the line of the rear elevation of the building is identified as being at low risk, but this is not a particularly unusual occurrence on a fully developed site in an urban location.

¹<https://images.reading.gov.uk/2019/12/Revised-Parking-Standards-And-Design-Supplementary-Planning-DocumentOct11.pdf>

From rivers and seas



From surface water



[Surface water: understand your flood risk - Check your long term flood risk - GOV.UK \(check-long-term-flood-risk.service.gov.uk\)](https://check-long-term-flood-risk.service.gov.uk/)

*Being at risk of flooding does not prevent a permitted development application but is a matter the Local Planning Authority will need to be satisfied on.

Figure 2: Flood risk affecting the site

Source: <https://flood-map-for-planning.service.gov.uk/>

Crucially, the proposals will not introduce additional hardstanding to the site, which is already well established, so it is reasonable to conclude that there will be no impact on flood risk, including the creation of any new flood risks, as a result of the proposed change of use.

Contamination

Given our client's intention is to convert an existing building without breaking any ground underneath or external to the building, and with no soft landscaping proposed, the risk of contamination as a result of the proposed change of use is deemed low accordingly.

Noise impacts from adjacent commercial land uses

In relation to noise impacts, Class MA of the 2015 GPDO (as amended) states that the LPA can only consider:

'impacts of noise from commercial premises on the intended occupiers of the development'.

Whilst the building is located in the town centre where you typically find commercial premises, as noted earlier the majority of adjoining land uses are residential, and any road traffic noise, including from Caversham Road adjacent, is not a commercial source of noise.

Based on the above, it is reasonable to conclude that noise is not a determining factor for residential applications in this location and that any concerns can be overcome by suitable conditions.

The provision of adequate natural light in all habitable rooms of the dwellinghouses

As can be seen from the submitted plans, all apartments will be served by existing sizeable windows, with the conversions carried out in such a way as to maximise the benefit of these.

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

The building is not located in an area considered important for such uses, and thus the above consideration is not applicable.

The impact on the local provision of the type of services lost, where the development involves the loss of services provided by a registered nursery or a health centre maintained under section 2 or 3 of the National Health Service Act 2006

The change of use will not result in the loss of any of the above services.

The fire safety impacts on the intended occupants of the building

The proposals do not meet the fire risk condition set out in the GPDO, meaning the above consideration is not applicable.

Space standards

The floor areas of all apartments are marked on the submitted plans and these demonstrate that space standards will be satisfied across the whole scheme.

Conclusions

The development will not give rise to any unacceptable impacts in terms of highways, drainage and flooding, land contamination, or noise disturbance. Furthermore, it is clear that - due to the nature of the existing buildings' windows and the layout of the conversions proposed - all apartments will be provided with adequate natural light and demonstrate compliance with space standards. Finally, owing to the height of the building, previous office use, and site context, there will be no impacts in respect of fire safety, loss of nursery or health services, or introduction of residential uses in an area assessed important for general or heavy industry, waste management, storage and distribution (or a mix of such uses), respectively.

In view of all the above, it is considered that in accordance with Class MA of the 2015 GPDO (as amended), the prior approval of the LPA is not required for the proposed development. In the event that prior approval is deemed to be required, it should be granted accordingly for the reasons set out in this letter.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'David Marjoram', written in a cursive style.

David Marjoram
Principal Planner