

5 December 2024

FAO Chief Planning Officer
Planning Department
Reading Borough Council
Civic Offices
Bridge Street
Reading
Berks
RG1 2LU

Dear Sir/Madam,

Re: 18 Bridge Street, Caversham, Reading, RG4 8AA

I am pleased to enclose a prior-approval submission for the Change of Use from Retail and Commercial Offices (Class E) to Mixed Use Commercial and Residential at the site stated above. This letter will introduce the meaning of 'development' in accordance with the Town and Country Planning Act 1990 and introduce the allowances of Schedule 2 Part 3 Class G of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (hereafter referred to as the 'GPDO'). This letter shall set out how the development accords with the provisions and conditions as set out within the GPDO to enable determination by the planning officers at the Council. The conclusion reached is that the development is lawful and should be duly granted prior approval.

The application is accompanied by the appropriate planning application forms and plans.

The relevant application fee will be submitted by the applicant separately.

Relevant Legislation

Section 55(1) of the Town and Country Planning Act 1990 includes 'the carrying out of building, engineering, mining, or other operations in, on, over or under land' within its definition of 'Development'. The change of use of the land is considered to fall within this definition.

The GPDO provides commercial premises with permitted development and prior approval rights to change the use of their buildings under Schedule 2, Part 3, Class G. This permits 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 Class Order to a mixed use falling within Class E and up to 2 flats (Class C3).

18 Bridge Street, Caversham, Reading, RG4 8AA comprises a three storey building, with the ground floor in use as retail, and the first and second floor in use as offices, all of which fall under use class E.

The site accessed via Bridge Street. As seen in the attached plans, the ground floor will remain unaltered as a result of this proposal.

This prior approval application seeks to change the use of the shop and current offices (Class E) to a mixed residential and commercial use comprising a dental clinic and two flats. The commercial unit on the ground floor will be retained and no major changes to the unit are proposed.

Assessment of Proposals

Permitted development

G. Development consisting of a change of use of a building-

a) from a use within Class E (commercial, business and service) of Schedule 2 to the Use Class Order, to a mixed use for any purpose within that Class and as up to 2 flats

The building is used as a shop and offices, falling within Class E of Schedule 2 to the Use Classes Order, and seeks to change to a dental clinic and 2 flats to the first and second floor.

c) from a use within article 3(6)(n) (betting office) or 3(6)(o) (pay day loan shop of the Use Classes Order, to a mixed use for any purpose within Class E (commercial, business and service) of Schedule 2 to that Order and as up to 2 flats

Not applicable.

e) from a use falling within article 3(6)(n) (betting office) or 3(6)(o) (Pay day loan shop) of the Use Classes Order to a mixed use falling within article 3(6)(n) (betting office) or 3(6)(o) (Pay day loan shop) of the Use Classes Order and as up to 2 flats.

Not applicable.

Conditions

G.1 Development permitted by Class G is subject to the following conditions

–

a) some or all parts of the building used for a use within, as the case may be, article 3(6)(n) (betting office) or 3(6)(o) (pay day loan shop) of, or

Class E of Schedule 2 to, the Use Classes Order is situated on a floor below the lowest part of the building used as a flat;

The building comprises a shop at ground floor, falling within Class E of Schedule 2, and seeks for the erection of 2no. two bedroom flats at the first and second floor respectively. This criteria is therefor met.

b) where the development consists of a change of use of any building with a display window at ground floor level, the ground floor must not be used in whole or in part as a flat;

The development does not comprise any alterations at the ground floor level so this criteria does not apply.

c) a flat must not be used otherwise than as a dwelling (whether or not as a sole or main residence)-

- i) by a single person or by people living together as a family, or*
- ii) by not more than 6 residents living together as a single household (including a household where care is provided for residents)*

The flats are to be occupied by a single person or people living together as a family and by not more than 6 residents living together as a single household. This criteria would be met.

d) before beginning development, 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-

- i) contamination risks in relation to the building;*
- ii) flooding risks in relation to the building;*
- iii) impacts of noise from commercial premises on the intended occupiers of the development;*

- iv) the provision of adequate natural light in all habitable rooms of the dwellinghouses;*
- v) arrangements required for the storage and management of domestic waste.*

Contamination

The proposed change of use results in no changes to the host building that would result in contamination concern, and the previous use as a shop does not raise additional concern in this regard. No ground work is proposed.

Flood Risk

Submitted alongside this Statement is a Flood Risk Assessment prepared by BDS Surveyors Limited which confirms that the development proposals are not considered to represent a safety concern for residents or a burden on the emergency services in the event of the flood.

The site is located in Flood Zone 2, but the change of use is on the upper floors of the building. There is therefore, no change to the external fabric of the building, no change in the impermeable area of the site, no change to flood flow routes, no change to the impedance to flow or a loss of flood plain storage. The ground floor would be retained in the same use class. Thus there is no increased risk from flooding generated by the development.

The site is at low risk of flooding from groundwater, reservoirs, sewers, highways, rivers and the sea (tidal). Surface water/flash flooding is at a higher risk, but again the development is at first and second floor where upper floors are already considered a safe refuge as they are well above the 100 and 1000 year flood level.

The Table 2: Flood risk vulnerability classification of the government's Planning Policy Framework Annex 3 Flood risk Vulnerability classification

indicates a residential use falls within a 'more vulnerable' classification. As this is higher than the existing classification of 'less vulnerable', mitigation is proposed. Firstly, it is noted that the site is on higher ground levels than adjacent to the Thames watercourse which provides a measure of flood defence. Secondly, the accommodation being at first and second floor is above 2.5m over street level and hence well above the 100 and 1000 year flood level. Floor levels are therefore acceptable. Thirdly, it is ensured that a safe and independent escape route is proposed, independent of the commercial use below. Bridge Street remains a safe route for emergency vehicles even in times of flood, and an evacuation route north away from the river would be possible along Bridge Street to Church Street and Church Road. From here a full dry route is available to St Peter's Hill. This proposed escape route is safe for all and therefore low hazard. Fourthly, occupiers should subscribe to the Environment Agency's Flood Warning Service. With the known long response time of the Thames to rainfall (3-4 days) residents would be able to vacate the flats well before a flood event occurred, take safe refuge in the flats themselves noting the upper floor levels. Such refuge would include stockpiling provisions to stay in the property during a flood event. It is noteworthy anticipated flood depths are shallow in any event and so escape should always be possible.

No mitigation is required for the ground floor as planning is not required and the vulnerability and risk is no different.

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	✗	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	✗	✗	✗	✓*

Key:

✓ Development is appropriate

✗ Development should not be permitted.

In summary, the proposal is appropriate development as indicated above as is supported by the Flood Risk Assessment prepared by BDS Surveyors Limited. It is noted similar development was approved at 16 Bridge Street under application 190127.

Noise

Submitted alongside this Statement is a Noise Impact Assessment prepared by ACA Acoustics which confirms that allowing for an appropriate mitigation strategy as set out within the report, sound intrusion to the proposed residential dwellings should not be detrimental to the amenity of future occupants and the site is suitable for the proposed development.

The property is located in a frontage of similar buildings with commercial on the ground floor and residential above. The proposed use as a dental clinic does not raise noise concerns and would be operational during working day hours. Existing commercial premises nearby include the Riverside Dental Centre (which the proposed ground floor would be an expansion of this business) and other class E uses such as estate agents. The present opening hours of the dental centre are 7:45am -6:45pm Monday – Friday and 8am-1pm Saturdays, which is not a cause of concern.

There is a tyre replacement centre opposite, but this is set back from Bridge Street. The operational hours are 8-6pm Monday – Friday and 8-5pm Saturdays. This is not considered to be harmful and it is noted there is already residential development opposite and adjacent to number 18 at 16 Bridge Street. There are also residential flats directly behind the commercial use at 69 Promenade Road.

Light

All habitable rooms would benefit from natural light and ventilation.

Refuse

A domestic refuse point would be located adjacent to the commercial refuse point. This is in the same position as existing.

Conclusion

There are no other limitations in the GPDO relevant to this application. Thus, it is suitably demonstrated that the proposed development complies with the GPDO subject to the prior approval process being undertaken. Whilst the site falls within an Article 4 Designation removing the rights of Part 3 Class MA, this has no bearing on the development at hand.

The site, comprising vacant offices to the first and second floor as existing, would otherwise remain vacant. As such, a residential use in the upper floors of the building is acceptable and would make an efficient use of the site.

I trust that this letter, in addition to the accompanying plans, are sufficient for you to make a determination. If you require additional information, please do not hesitate to contact me.

Yours faithfully,

Holly Goulding BSc (Hons)

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