



Queen's Wharf, 47 Queen's Road, Reading RG1 4QE

Planning Statement

December 2023



1.0 Planning History

1.1 Existing Use

The application site forms part of 47 Queens Road, an 8 storey building situated between Kennetside to the north, and Queens road to the south. It is located within the Central Area of Reading designated employment zone.

The application site comprises the partial ground floor accommodation on the southerly side facing onto Queens Road.

The buildings surrounding 47 Queens Road comprise a mixture of residential and commercial spaces, predominantly 3-4 storeys in a brick finish.

The building at 47 Queens road comprises 8 storeys, the lowest floor of which is the main entrance from Kennetside, and access to the undercroft parking. The ground floor is a mixture of residential and commercial use, with the upper six storeys in full residential use.

The existing building at 47 Queens Road is primarily residential in use, having been converted in the early 2000s from a governmental office building. The application site is the last remaining non-residential floor space in the building. This floorspace is served by the same building managers as the commercial space.

The building at 47 Queens Road has a rendered finish, with powder coated aluminium window frames. At upper levels, there is a metal cladding finish to the top floors, along with timber balconies.

The existing office accommodation is 6000sqft, comprises a largely open plan space. The accommodation is fairly dated, with suspended ceilings and carpet finishes. In our opinion not up to the standard expected from modern office spaces.

1.2 Previous Applications

The following applications have previously been submitted to the council. These previous applications indicate that this is typical of the type of development to the site.

Planning application no: 992239

Refurbishment of existing office building with new entrance and reception area.

Decision date: 09/07/1999

Planning application no: 991765

Conversion/extension of existing commercial premises into 78 residential apartments and conversion of part of ground floor of building into a health and fitness centre, supported by secure parking for 63 parking spaces.

Decision date: 13/12/2000

Planning application no: 010602

Change of use (Health and Fitness to office accommodation) remaining residential unchanged

Decision date: 29/07/2002

1.3 Recent Applications

The existing building is currently undergoing refurbishment works to enhance the fire safety of the building, including replacement of insulated render, balcony decking and handrails.

Planning application no: 231112

Replace existing insulated render building external facing material and replacement of vertical metal cladding panels. Replacement of balcony decking and timber handrails



2.0 Prior Approval

2.1 Recent Applications

Two parallel applications for Prior Approval were submitted for the proposed conversion of office floorspace (Class E) to residential units (Class C3) in September 2022.

Two two applications were for either 7 dwellings or 9 dwellings.

Following discussions with the case officer, the overall approach for the change in use was supported, but due to fire safety information not being available, the applications were refused on 10th November 2022.

The following was provided for refusal:

"1. The proposed development has failed to demonstrate that the external wall systems meet the required fire safety standard of class A2-s1, d0 or better in accordance with 'BS EN 13501-1:2018 Fire classification of construction products and building elements. Part 1: Classification using data from reaction to fire tests'. Prior approval is therefore refused on the basis that the development would fail to meet the requirements of paragraph MA.2.(2)(i) of Schedule 2, Part 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)."



Fig. 1 Planning application no: 221383 - 7-unit scheme



Fig. 2 Planning application no: 221384 - 9-unit scheme

KEY		Unit Mix	
	Entrance		Studio
	Existing fabric		1 bedroom 2 person
	Proposed fabric		2 bedroom 4 person



3.0 Pre-application Enquiry

3.1 Pre-Application Enquiry

Following the refusal of the Prior Approval applications, a level 2 pre-application advice was submitted in July 2023 for Conversion of the ground floor from Class E to C3 to create 9 residential units, including minor external changes to create three balconies.

Case officer Thomas Bradfield provided the following headline feedback, supporting the proposals:

"Should the loss of office be justified, introducing additional residential units to a primarily residential building would be considered acceptable in principle."

Specific design feedback was received in relation to the proposed layouts of the nine residential units. Please refer to the Design and Access report accompanying this application for further information.

The following pages outline how the remaining planning policy feedback was incorporated into the new proposals.



Fig. 3 Pre-application Proposals - Proposed Ground Floor Plan (1:200@A3)



4.0 Proposals

4.1 Proposed Layout

The current proposals have been developed following feedback received at Pre-application stage.

The primary objective of the proposed development is to provide high quality housing to replace underused commercial space, in an otherwise residential building.

The dwellings have been design to provide generous spaces, which utilise the existing and constrained floor layout, and maximise existing single and double aspect external openings. All dwellings are in accordance with Local and National minimum space standards.

A storage space for the dwellings is provided adjacent to the main entrance from Queen’s Road.

There are 8no. dwellings as part of this application with the proposed housing mix as follows:

- Studio: 1 dwelling
- 1 bedroom 2 person: 3 dwellings
- 2 bedroom 4 person: 4 dwellings

The communal corridor is positioned centrally in the plan, allowing units to be located along the western facade utilising the existing windows.

KEY

Entrance

Existing fabric

Proposed fabric

Unit Mix

Studio

1 bedroom 2 person

2 bedroom 4 person

Proposed balconies



Fig. 4 Current Proposals - Proposed Ground Floor Plan (1:200@A3)

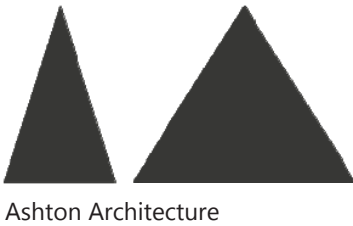


4.2 Schedule of Areas

Please refer to adjacent area schedule for unit sizes.

All units meet or exceed Local and National space standards.

Where possible, external amenity spaces have been provided in accordance with the design elsewhere in the block.



AREA SCHEDULE

PROJECT : 47 Queens Road, Reading

JOB NO. : 884

TYPE / STAGE : **Stage 3**

REV : A_191223

Type	Entrance Floor no.	Unit no.	Bedrm no.	No. of people	Hab. rm no.	GIA		Amenity Type	Amenity Area	Notes
						m2	ft2		m2	
Residential	Ground	1	1	2	2	51	549			
		2	2	4	3	101	1087			
		3	2	4	3	78	840	Balcony	5	
		4	1	2	2	55	592	Balcony	5	
		5	2	4	3	77	829	Balcony	5	
		6	1	2	2	53	570	Balcony	5	
		7	1	1	1	40	431	Balcony	5	
		8	2	4	3	74	797	Balcony	5	
TOTAL			12	23	19	529	5,694	-	-	
		Studio 1		13%						
		1 bed 3		38%						
		2 bed 4		50%						
		3 bed 0		0%						

Please note that these areas may be subject to minor change resulting from the detail design coordination of SE and MEP information

4.3 Planning Policy EM3

Reading Borough Council's Local Plan [adopted 2019] covers the policy requirements around the loss of employment space within the borough - Policy EM3.

The application site is not located within a Core Employment Zone, but within the Central Area of Reading zone.

Planning Policy EM3 states 'the following matters will be considered when assessing proposals which would result in a loss of employment land: -

Is access by a choice of means of transport, including access to the strategic road network, poor, and likely to remain poor?

The application site is well connected to local transport routes, including train, bus and roads. However, there is no on site parking designated for the commercial space.

Is the continued use of the site for employment, including the potential for redevelopment for employment uses, viable?

It is likely the premises will remain vacant if its current use remains unchanged. There are several key factors for this;

The recently withdrawn Prior Approval powers for the conversion of office space to residential means this process cannot now happen automatically, but a number of nearby buildings have already benefitted from this allowance. As such, the immediate context of the application site has changed from a predominantly commercial environment, to a predominantly residential context.

This in turn has meant facilities aimed to support commercial spaces [administration / food / support services] have also relocated. As the application site is positioned within this newly established residential context, the change of use to residential is more appropriate to create a longer term, meaningful community, rather than having empty space unable to be used.

The application site is set within a fully residential block.

The change of use to residential would create a singular block use, which is particularly appropriate in maintaining good building safety, especially in light of the current change in fire regulations.

The application site is land-locked within the building and there is little opportunity to enhance the existing commercial space to provide the facilities needed for modern office use, such as; outdoor amenity space, health and fitness spaces and such like.

The trend for office space is towards smaller units, supported by a range of services on site. The lack of facilities would make splitting the space into smaller office spaces difficult for demands.

A particular challenge is respected of Discrimination and Disability Act is level access into the site, and future proofing the accommodation.

Is there a surplus of a similar size and type of accommodation in Reading?

The Applicant's agent, Haslams, has advised there is over 1,000,000 square feet of commercial space on the market within the Central Area of Reading zone, which highlights a further reason for the lack in interest in the application site. There is higher quality accommodation elsewhere in the Central Area of Reading, which is better suited to the modern needs of occupants.

Would continued employment use of the site detrimentally affect the amenity and character of a residential area?

The application site is located in an area of changing character, due to the recent conversion of office spaces to residential accommodation. Moreover the application site sits within a residential block. This recent change has meant the facilities needed to support commercial activity are moving from the area, meaning ongoing commercial use is difficult to sustain – particularly in the post pandemic market. This is compounded by the application site not

being able to be modified to provide some of the modern facilities expected for contemporary office space.

Is the need for alternative uses stronger than the need for the retention of employment land?

The proposed conversion of the commercial space into 8 dwellings, mirrors the use of the remaining building, in providing high quality homes which exceed local and national space standards.

The evidence provided with this application demonstrates the existing space is not in demand for use as a commercial space and unless changed, is likely to remain vacant.

According to 'Housing Strategy for Reading 2020-2025', the borough's emphasis is on providing high quality and sustainable housing and neighbourhoods.

With the limited supply of land, conversion of existing accommodation must form part of the housing supply chain.

It is an accepted fact that there is currently an acute shortage of new homes, and this proposed development will help contribute to the current shortfall.

Would the proposal result in a piecemeal loss of employment land where there is potential for a more comprehensive scheme?

The application site is situated within a fully residential block, and represents only a small percentage of the total building footprint. Its positioning in the wider building removes the opportunity for a more comprehensive commercial scheme.

Summary: The points outlined above provide a strong argument for the loss of underused employment space.



5.0 Response to Pre-application Feedback

5.1 Change of Use:

The following Pre-application feedback was provided by Reading Borough Council in relation to the change of use policy matters in connection with the proposed development:

The proposal would result in the loss of office floorspace in the Central Area of Reading. Justification of this loss would have to be made as part of a full planning submission, which covers the criteria as set out in Policy EM3. ...Should the loss of office be justified, introducing additional residential units to a primarily residential building would be considered acceptable in principle.

Please refer to the Marketing Assessment accompanying the planning application.

5.2 Affordable Housing

The following Pre-application feedback was provided by Reading Borough Council in relation to the affordable housing policy matters in connection with the proposed development:

The pre-application submission does not provide any information regarding the affordable housing offer. If the proposal falls short of this policy requirement, then a viability assessment is required to be submitted, along with an additional fee to cover its assessment, in accordance with the viability fees outlined on the Reading Borough Council website.

A viability assessment will be provided by the Applicant in due course.

5.3 Transport

The following Pre-application feedback was provided by Reading Borough Council in relation to the transport policy matters in connection with the proposed development:

Policy TR5 requires developments to provide adequate car and cycle parking. ...If car parking below the Parking Standards is proposed, then this should be justified as part of the application. Cycle parking is proposed at basement level, which is acceptable. Information regarding servicing arrangements should be provided as part of the application, particularly regarding waste and recycling storage and collection.

A transport Technical Note has been provided by Lime Transport to support the application proposals, and concludes that:

It can be concluded that the development is compliant with national, local policy and in particular with the Reading Borough Local Plan and Reading Transport Strategy 2040. It is considered that the impact on the transport network will be minimal. Any impact is further limited as the development is proposed to be car-free with generous cycle parking provision.



5.4 Noise

The following Pre-application feedback was provided by Reading Borough Council in relation to the noise policy matters in connection with the proposed development:

The site is likely to be affected by road noise from Queens Road. A noise assessment should be submitted in support of the application.

A Noise Impact Assessment Report has been prepared by KP Acoustics Ltd to support the application proposals, and concludes that:

The reports notes that internal noise levels are above permitted levels, and a secondary glazing system [mounted internally] is required to two elevations; front and side.

As such, secondary glazing is proposed internally to the windows shown on the application drawings.

5.5 Air Quality

The following Pre-application feedback was provided by Reading Borough Council in relation to the air quality policy matters in connection with the proposed development:

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.

An Air Quality Assessment has been prepared by Greenavon Air Quality Consultants to support the application proposals, and concludes that:

The proposed development is, therefore, considered compliant with all local and national planning policy. Air quality should not, therefore, present a significant barrier to the planning process.

5.6 Daylight

The following Pre-application feedback was provided by Reading Borough Council in relation to the daylight policy matters in connection with the proposed development:

Five of the nine units would be single aspect, and there are some concerns regarding their outlook and light into habitable rooms. In particular, the bedroom of Unit G.1, the living space of Unit G.4 and the bedroom of Unit G.7 would appear to struggle for sufficient light and outlook. Furthermore, the depth of the living spaces in

Units G.3, G.5 and G.6 could result in quite dark areas at the back of the rooms. A daylight and sunlight report should be submitted as part of the application to demonstrate that appropriate levels of light are provided

A 'Daylight and sunlight within the Proposed Dwellings' report has been prepared by Anstey Horne to support the application proposals, and concludes that:

'the layout of the proposed development follows the BRE Guidelines and will provide good/ daylight and sunlight conditions within the proposed accommodation.



6.0 Summary

6.1 Conclusion

The proposed conversion of the application site meets the test of the EM3 planning policy.

The site is capable of delivering high quality dwellings in line with local and national planning policy requirements.

The loss of employment space can be justified through a review of the poor quality of the existing commercial space, inconvenient location and lack of demand.

The Applicant is seeking to optimise the site to provide a use which will be of greater benefit to the local community and wider context.

On this basis we trust the application proposals will be supported.

