



Head of Planning and Development  
Planning Department  
Reading Borough Council  
Civic Offices  
Bridge Street  
Reading  
RG1 2LU

9<sup>th</sup> January 2025

Ref. SP24-1060

Dear Sirs,

**Town and Country Planning Act 1990 – Full Planning Application  
Great Brighams Mead, Vastern Road, Reading, RG1 8DJ**

Simply Planning Limited (SPL) is instructed by our client, Kings Oak Miami LLP (in Administration), to submit the enclosed full planning application which seeks external alterations to the property known as Great Brighams Mead, Vastern Road, Reading, RG1 8DJ ('the site').

The full description of development is as follows:

***'External alterations in connection with conversion of the building to residential use'.***

The following plans, prepared by Ridge and Partners LLP, are submitted in support of this application.

| Drawing Ref.                 | Title                                         | Scale    |
|------------------------------|-----------------------------------------------|----------|
| 5025893-RDG-XX-EL-D-B-0901-A | Existing Elevations                           | 1:200 A1 |
| 5025893-RDG-XX-EL-D-B-0902-A | Existing Inner Elevations                     | 1:200 A1 |
| 5025893-RDG-XX-EL-D-B-0903-B | Proposed Elevations                           | 1:200 A1 |
| 5025893-RDG-XX-EL-D-B-0904-B | Proposed Inner Elevations                     | 1:200 A1 |
| 5025893-RDG-XX-EL-D-B-0907-B | Proposed Elevations Window Replacements       | 1:200 A1 |
| 5025893-RDG-XX-EL-D-B-0908-B | Proposed Inner Elevations Window Replacements | 1:200 A1 |

The requisite planning fee (£363) will be paid via the planning portal.

By way of background, Prior Approval (ref. 210567) was awarded in June 2021 for the following:

***"Change of use from office use Class B1 (a) to Use Class C3 to comprise 110 residential units."***

Application (ref. PL/24/1320) sought to extend the timeframe for completion of the development from 3 years to 6 years. This application was approved on 2<sup>nd</sup> December 2024. Accordingly, the development is required to be completed by 1<sup>st</sup> June 2027.

This application bought the project and design team time to complete the development and allowed for a full detailed design and feasibility review to be undertaken. Layout changes to the consented development form part of a follow-up Section 73 application that has been submitted to the LPA, in parallel with this submission and seeks to replace several of the consented drawings as they appear at Condition No. 2 of planning application ref. PL/24/1320. Following the aforementioned design audit.

This planning application is, therefore, submitted alongside the follow-up Section 73 and seeks permission for several elevational changes to the consented building ensuring design consistency between the two submissions.

## Site and Surroundings

The application site comprises a three-storey former office building known as Great Brighams Mead with a part brick façade, a hipped roof and a distinctive clocktower located in a prominent position facing the public realm.

The site is located to the north of Reading Train Station, fronting onto the Caversham Road/Vastern Road roundabout. It is on the edge of a residential area which comprises predominately terraced Victorian houses and flats to the rear.

In terms of main planning constraints, the site is located within Flood Zone 3. The River Thames is located directly to the rear of the site.

The site is not statutory or locally listed, and there are no listed buildings or scheduled monuments located within the immediate vicinity.

The site lies outside, but on the edge, of the Central Core Policy Area and the Office Core Policy Area (Reading Borough Local Plan).

## Planning History

The pertinent planning history, is summarised in the table below:

| Planning App Ref. | Description of Development                                                                                                                                                                                                                                                                                                  | Decision/Date               |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| 210567            | Change of use from office use Class B1(a) to use Class C3 to comprise 110 residential units. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.                                                                                            | Approved<br>1 June 2021     |
| 220717            | External alterations in connection with conversion to residential use, including replacement of main revolving doors with double swing doors, new glazing to lobby, creation of side and rear door openings, new window openings and replacement windows.                                                                   | Approved<br>4 August 2022   |
| 221479            | Application for Prior Approval of 72 proposed new dwellinghouses on detached buildings in commercial or mixed use - Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 20, Class AA, for the proposed additional storeys to result in a third and fourth floor. | Refused<br>21 November 2022 |
| 220778            | Application for Prior Approval of 72 proposed new dwellinghouses on detached buildings in commercial or mixed use - Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part                                                                                          | Refused<br>4 August 2022    |

| Planning App Ref. | Description of Development                                                                                                                                                                                                                                                                                                                                                                          | Decision/Date                             |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
|                   | 20, Class AA, for the proposed additional storeys to result in a maximum overall building height of 21.92m.                                                                                                                                                                                                                                                                                         |                                           |
| 230745            | Construction of a two-storey roof (third and fourth floor) extension to accommodate 100 apart-hotel rooms (Use Class C1) with associated parking, cycle stores and bin stores.                                                                                                                                                                                                                      | Refused<br>13 <sup>th</sup> August 2024   |
| 24/1320           | Change of use from office use Class B1(a) to use Class C3 to comprise 110 residential units. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 without complying with condition 1 (time limit for completion) of consent ref. 210567 to allow for completion of the development within 6 years rather than 3 years | Approved<br>2 <sup>nd</sup> December 2024 |

As shown in the table above, the main planning history relates to conversion of the building to residential purposes, as originally permitted under planning application ref. 210567.

There is also established precedent for standalone planning applications, which have secured external alterations of the former office building ensuring it is suitable for residential purposes/conversion. In this regard, the current application proposals are no different. They seek minor alterations to the building in conjunction with an improved residential layout and are necessitated by a comprehensive technical and design led review of the project.

### Proposed Development

Following approval of planning application ref. 24/1320, the detailed design of the residential conversion has evolved. Accordingly, alongside internal alterations, it is also now necessary to seek several minor elevational changes to the existing (former office) building to enable its conversion to residential purposes of both the form and type now proposed. In short, planning permission is sought for the following:

- Highlighted large windows removed and replaced with slightly smaller new windows. The materials, colour and fenestration design of the new windows are all to match existing.
- The windows have been replaced to allow a section of 1.3m wide approx. non-combustible construction (typically brickwork to match existing) to be installed. This is to ensure that the internal party walls between apartments comply with the latest fire regulations.
- Section of infill brickwork (to match existing) indicated at ground level below existing windows. This is to reflect the internal raised ground floor slab level.
- Facetted full-height curtain walling to each end of the building replaced with matching fire-rated curtain walling. The colour and fenestration design of the new curtain walling to match existing. This is required to ensure adequate fire compartmentation between floors.
- Automatic smoke vents (in pitch with existing roof) indicated upon elevation. These are required to ensure compliance with current fire regulations.
- Automatic smoke vents (0.5m high on central flat roof) indicated upon elevations. These are required to ensure compliance with current fire regulations.

- New entrance curtain walling and entrance doors indicated at front and rear of the central atrium. These have been previously approved under application 220717.
- New external escape doors from new staircores indicated upon elevations. Adjoining external ramps indicated to provide a safe level exit from the building.

From the outset, it is worth considering whether the external works would constitute development, and as such, require planning permission.

Development as defined by Section 55 of the Town and Country Planning (Meaning of Development) (England) Order 2015 (as amended) sets out what would not be considered development, the relevant text (paragraph 2) is extracted below:

*'The following operations or uses of land shall not be taken for the purposes of this Act to involve development of the land—*

*(a) the carrying out for the maintenance, improvement or other alteration of any building of works which—*

*(i) affect only the interior of the building, or*

*(ii) do not materially affect the external appearance of the building.'*

On this basis, it is questionable as to whether the works proposed can be said to materially affect the appearance of the existing building itself. They are all extremely minor in nature with the majority of the changes largely indistinguishable. However, for completeness, and to ensure consistency with the follow up s73 they have been included as part of this submission.

### Key Relevant Planning Policies

Section 38 (6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

The statutory development plan for the application site comprises the Reading Borough Local Plan (adopted November 2019).

The relevant policies in the determination of this application includes:

| Policy                           | Description                                                                                                                                                                                                                                                                                                                                                       |
|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CC1: Presumption in Favour       | A positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). Where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible. |
| CC7: Design and the Public Realm | All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.                                                                                                                                                                                                            |

| Policy                        | Description                                                                                                                                                                    |
|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CC8: Safeguarding Amenity     | Development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties. |
| H5: Standards for New Housing | This policy sets out the standard for new housing development.                                                                                                                 |

The National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG) and Supplementary Planning Documents/Guidance (SPD/G's) are also important material considerations.

## Material Considerations

### Design

The proposed external alterations are materially minor in nature and do not have any adverse impact on the existing building or character of the surrounding area.

No new built form will occur as a result of the proposal. The height, scale and mass of the existing building will remain unaltered.

The elevational changes are considered to be minimal and do not substantially differ from the consented position. They are compliant with adopted Policy CC7 (Design and the Public Realm) which states:

***'All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.'***

It is considered that the modest elevational changes proposed to the exterior will improve upon the existing position, especially on the principal elevation, which now contains a new entrance, doors and glazing. The alterations ensure the building is fully suitable for a residential conversion of both the form and type now proposed.

Moreover, it is anticipated that all changes will match the existing elevations in terms of materiality. This is to create minimal material difference from the existing position.

In the context of the alterations proposed through this application, it is also worth noting that similar external alterations to the fenestration detailing of the former office building have previously been considered acceptable by the Local Planning Authority in the awarding of planning application ref.220717. This application proposed a similar arrangement of windows / doors to facilitate the conversion to residential use. In considering this application, Officers remarked within their delegated report, the following:

***'The proposed development would not be harmful to the character or appearance of the site or its surrounding and would not have a detrimental impact on the amenities of the original building or those of neighbouring properties.'***

The current proposals draw several similarities with this approved application. These include for example:

- New entrance doors and front glazing
- New windows on turrets
- New doors at ground floor level

In this regard, there has been no material change in circumstance which would now warrant a different decision now being taken.

This application also seeks to incorporate additional ventilation outlets within the roof space. These take the form of smoke vents informed by a wider fire safety strategy for the building, following its conversion to residential use. The proposed ventilation is contained entirely on the roof, minimising the visual impact.

As can be identified in the submitted plans and drawings the proposed ventilation outlets are a minor addition, thus, it is not considered that they will cause any visual intrusion. The smoke vents will provide a controlled means of removing smoke and heat from the building, allowing for safer evacuation and reducing the risk of smoke inhalation and fire spread.

Lastly, as per the submitted plans and drawings, the proposal will also incorporate 4 additional means of escape at the ground floor level. These will also have new external stairs / ramps for access and exit, this is in order to tie in with the internal layout alterations as part of the S73.

Given the above, it is not considered that the new means of escape / access will be of detriment to the existing building or character of the area.

#### **Amenity**

As previously described, this full planning application has been submitted in conjunction with a follow up s73 application that seeks permission for internal alterations and, in-short, a much-improved residential layout compared to that previously consented at this location. The proposals give rise to no residential amenity concerns. All properties continue to meet, or exceed, the minimum standards. Further, the internal layouts and positioning of windows have been designed with good daylight in mind and the building will continue to provide good levels of daylight to the proposed rooms once the elevational changes have been incorporated.

#### **Conclusions**

Based on the above, the proposed external alterations are materially minor in nature they do not substantially differ from the consented position. They give no rise in policy conflict and there is no reason as to why they cannot be supported.

The elevational changes should be read in conjunction with a follow-up s73 application, which is also with the LPA for determination.

I trust that the above and attached explains our thinking behind the suggest amendments. Obviously, we are happy to discuss the application with your officers once the application has been registered. If there is any reason why the application cannot be registered, then I would be grateful if you can contact me immediately. Otherwise, we look forward to further discussions with the case officer, throughout the determination period.

Yours faithfully,



A handwritten signature in blue ink that reads "Alastair Thornton".

Alastair Thornton

Director

Encs.