

Reading Borough Council
Planning Department
Via Planning Portal Only

24th July 2025

Dear Sirs

**Prior Notification requirement under Part MA of the GPDO for the change of use of Class E space to form 78 apartments.
Site at Abbey Wharf, 57 Kings Road, Reading RG1 3AB**

This Prior Notification submission relates to the entirety of this five storey building used under Class E of the UCO to form 78 apartments under Part MA of the GPDO. The application is accompanied by a site plan together with the application forms and proposed and existing detailed floor plans. In addition, the completed CIL forms are included and the application is also supported by:

- a detailed Flood Risk Assessment including flood evacuation plan
- a contamination report
- a noise impact assessment
- and a Daylight Assessment.

The site frontage is shown in Figure 1 below.



Figure 1 - Site Frontage

The application site is located on Kings Road near the Crown Bridge. This office building has entrances in the south elevation (onto Kings Street) and the north elevation (facing the River Kennet). The site is bordered to the north and west by the River Kennet and includes a terrace area to north. The site falls within the Central Core and Area of Archaeological Potential as defined by the Reading Central Area Action Plan (2009).

The site has the benefit of an underground car park comprising circa 40 spaces.

The site is located within an Air Quality Management Area, area of potential contaminated land and is mostly within Flood Zone 2 however the north west corner of the site is within Flood Zone 3.

The Abbey Ruins (Scheduled Ancient Monument) are situated opposite the application site but the application building is not listed, nor is it located within a conservation area. Whilst Reading does possess an Article 4 Direction area this site is located outside of such defined areas.

The location of the site is shown in Figure 2 below.

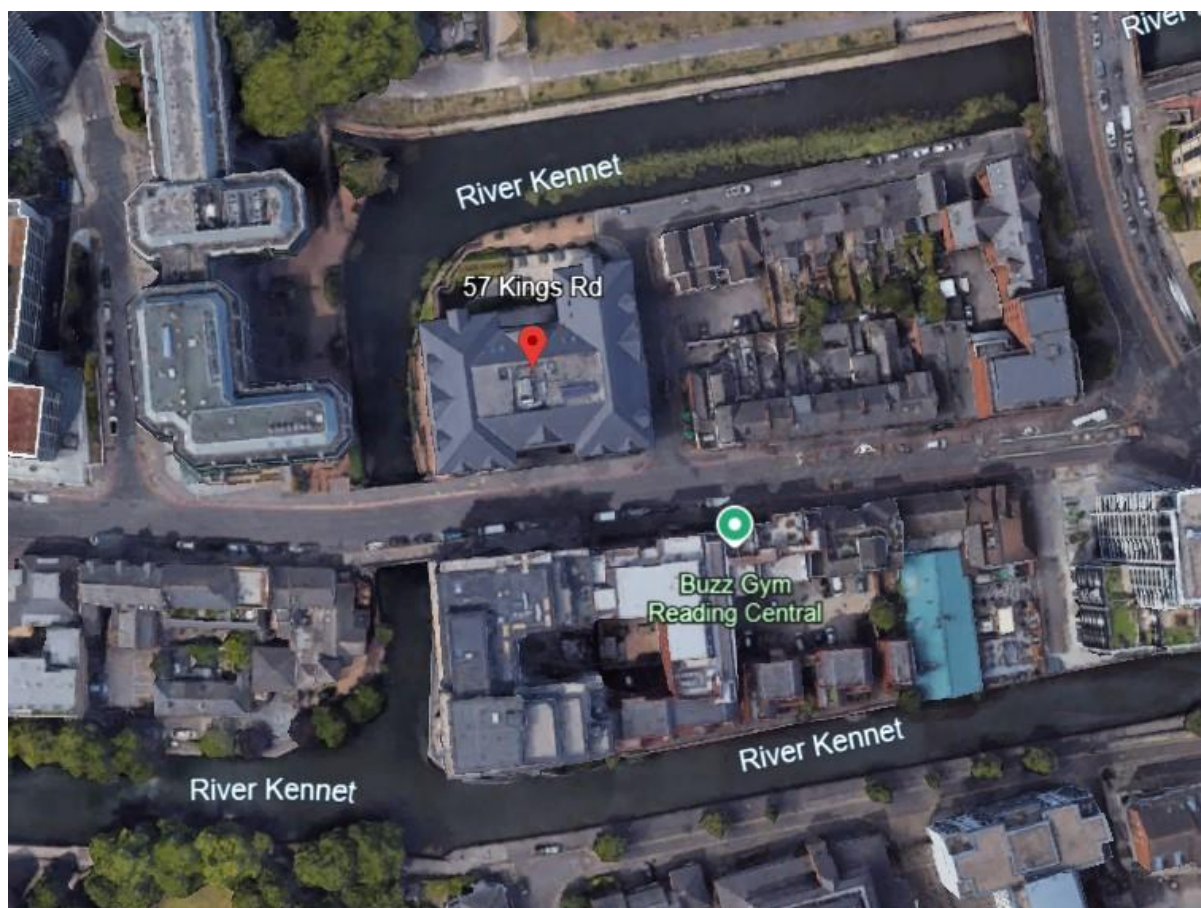


Figure 2 – Site Location

Planning History

Earlier this year a prior notification application to convert the building to form 78 apartments was refused by the LPA under reference PL/25/0642 with the reasons for refusal set out below:

1. The submitted Flood Risk Assessment does not adequately assess the flood risks posed from the development. Therefore, the Council is not satisfied the proposed change of use of the building from office to a residential would not increase the risk of flooding to the future occupants of the building, moving from a “less vulnerable” to more “more vulnerable” classification. As such, the development is contrary to condition MA.2 (c) of Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development Order) (England) Order 2015 (as amended) and the advice contained within the NPPF (paragraph 181)

2. The Local Planning Authority is not satisfied, based on the limited information provided and owing to the site contamination risk and nature of the surrounding uses, that the development would not result in a contamination risk and unacceptable levels of noise and disturbance to any potential future occupants of the building. As such, the development is contrary to condition MA.2 (b) and (d) of Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development Order) (England) Order 2015 (as amended) and the advice contained within the NPPF (paragraphs 187, 196 and 198)

3. The existing building exceeds a height of 18 metres and the proposed change of use would result in two or more dwellings, whereby a Fire Statement has not been provided in support of the proposal. As such, the Council cannot be satisfied the proposal fire safety impacts on the intended occupants of the building are satisfactory. Therefore, the proposal fails to comply with condition MA.2 (i) of Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development Order) (England) Order 2015 (as amended).

Firstly, in terms of reason 3 the LPA have incorrectly assessed the “18m rule”. Part MA in terms of the assessment of height clearly sets out (with our emphasis)

(7) For the purpose of paragraph (3)—

(a) the height of a building is to be measured from ground level to the top floor surface of the top storey of the building (ignoring any storey which is a roof-top machinery or plant area or consists exclusively of machinery or plant rooms);

(b) when determining the number of storeys a building has—

(i) any storey which is below ground level is to be ignored; and

(ii) any mezzanine floor is a storey if its internal floor area is at least 50% of the internal floor area of the largest storey in the building which is not below ground level.

Furthermore, Fire safety and high-rise residential buildings (from 1 August 2021) advises that relevant buildings at planning gateway one comprise

- contain two or more dwellings or educational accommodation and
- meet the height condition: 18m or more in height, or 7 or more storeys

In this context it adds that:

- the top storey of the building being 18 metres or more in height should be determined ignoring any storey which is a roof-top machinery or plant area or consists exclusively of machinery or plant rooms, and should be measured from the ground level on the lowest side of a building to the top storey upper floor surface

When this assessment is undertaken this building is under 18m from ground level and therefore a fire statement is not required and this reason for refusal is ultra vires.

Turning now to reasons 1 and 2 this revised application is supported by an updated Flood Risk Assessment and Contamination Report which are assessed in further detail in the sections below.

Permitted Development

Class MA of the amended General Permitted Development Order, which came into force on the 1st August 2021 states that a development consisting of would constitute permitted development: -

MA. 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 Classes Order to a use falling within Class C3 (dwellinghouses) of Schedule 1 to that Order.

Paragraph MA.1 identifies that development is not permitted by Class MA if:

(a) unless the building has been vacant for a continuous period of at least 3 months immediately prior to the date of the application for prior approval;

This criterion has been removed in the amendment to Part MA which came into force on the 6th March 2024.

(c) if the cumulative floor space of the existing building changing use under Class MA exceeds 1,500 square metres;

This criterion has been removed in the amendment to Part MA which came into force on the 6th March 2024.

(d) if land covered by, or within the curtilage of, the building—

(i) is or forms part of a site of special scientific interest;

(ii) is or forms part of a listed building or land within its curtilage;

(iii) is or forms part of a scheduled monument or land within its curtilage;

(iv) is or forms part of a safety hazard area; or

(v) is or forms part of a military explosives storage area;

The site is not covered by any of the above listed designations.

(e) if the building is within—

(i) an area of outstanding natural beauty;

(ii) an area specified by the Secretary of State for the purposes of section 41(3) of the Wildlife and Countryside Act 1981(a);

(iii) the Broads;

(iv) a National Park; or

(v) a World Heritage Site;

The site is not covered by any of these listed designations

(f) if the site is occupied under an agricultural tenancy, unless the express consent of both the landlord and the tenant has been obtained; or

The site is not occupied under an agricultural tenancy

(g) before 1 August 2022, if—

(i) the proposed development is of a description falling within Class O of this Part as that Class had effect immediately before 1st August 2021; and

(ii) the development would not have been permitted under Class O immediately before 1st August 2021 by virtue of the operation of a direction under article 4(1) of this Order which has not since been cancelled in accordance with the provisions of Schedule 3.

Not the case with these proposals.

These matters are all agreed by the LPA given the previous application determination.

Conditions

This permitted development is also subject to conditions as identified in paragraph MA.2 namely that before beginning development under Class MA, 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—

- (a) transport impacts of the development, particularly to ensure safe site access;*
- (b) contamination risks in relation to the building;*
- (c) flooding risks in relation to the building;*
- (d) impacts of noise from commercial premises on the intended occupiers of the development;*
- (e) where—*
 - (i) the building is located in a conservation area, and*
 - (ii) the development involves a change of use of the whole or part of the ground floor, the impact of that change of use on the character or sustainability of the conservation area;*
- (f) the provision of adequate natural light in all habitable rooms of the dwellinghouses;*
- (g) the impact on 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; and*
- (h) where the development involves the loss of services provided by—*
 - (i) a registered nursery, or*
 - (ii) a health centre maintained under section 2 or 3 of the National Health Service Act 2006(a), the impact on the local provision of the type of services lost.*

(3) An application for prior approval for development under Class MA may not be made before 1 August 2021.

(4) The provisions of paragraph W (prior approval) of this Part apply in relation to an application under this paragraph as if in the introductory words in sub-paragraph (5), for “and highways impacts of the development” there were substituted “impacts of the development, particularly to ensure safe site access”.

(5) Development must be completed within a period of 3 years starting with the prior approval date.

(6) Any building permitted to be used as a dwellinghouse by virtue of Class MA is to remain in use as a dwellinghouse within the meaning of Class C3 of Schedule 1 to the Use Classes Order and for no other purpose, except to the extent that the other purpose is ancillary to the use as a dwellinghouse

(a) Transport

The use of this floorspace as residential would be likely to generate less traffic when compared to the former Class E office use which operated from the site. On that basis the traffic created by this proposed development would not lead to situations detrimental to highway safety.

Turning to matters of car parking the NPPF in matters of sustainable development, transport and car parking advises at paragraph 112 of the revised Framework advises that if setting local parking standards for residential and non-residential development, policies should take into account:

- a) the accessibility of the development;

- b) the type, mix and use of development;
- c) the availability of and opportunities for public transport;
- d) local car ownership levels; and
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

Paragraph 113 advises that maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.

In addition, paragraph 116 adds that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

In terms of local policy, Policy *TR5 states that development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.*

The Council has produced a Parking Standards and Design Supplementary Planning Document (SPD), which includes different standards in four different zones according to the accessibility of those zones. The SPD also sets out requirements for cycle parking and is now of some age being adopted in 2011.

The site is located in Zone 2 which seeks 1 space per flat however the site is highly sustainable nature with easy access to all the town's amenities and public transport opportunities including a less than 10 minute walk to the town's principle railway station.

Given the site's highly sustainable location, and the most up to date guidance in the Framework, it is submitted that the provision of 40 spaces for the 78 flats proposed would meet the sustainability guidance and advice of the up-to-date framework and would avoid harm to matters of highway safety.

In addition, adequate cycle parking and refuse storage is also provided on site to serve the proposed apartments and such is shown on the proposed block plan.

Overall, therefore it is concluded that the proposed development would fulfil sustainable development planning policies and would avoid any adverse impacts upon the local highway network and this is agreed by the LPA given the reasons for refusal of the previous application.

(b) Contamination risks in relation to the building

Turning now to matters of contamination the site lies in an area where matters of land and ground contamination have been previously raised in the local area and it is therefore highly unlikely that these proposals would lead to matters of contamination.

The application proposes the conversion of the existing building only with no "ground break" or indeed any alterations to the building. The building has been the subject of significant human work/habitation as offices which have existed satisfactory with no issues of contamination.

The previous application was refused, amongst other matters, in terms of such issues as set out below:

“The Local Planning Authority is not satisfied, based on the limited information provided and owing to the site contamination risk and nature of the surrounding uses, that the development would not result in a contamination risk and unacceptable levels of noise and disturbance to any potential future occupants of the building. As such, the development is contrary to condition MA.2 (b) and (d) of Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development Order) (England) Order 2015 (as amended) and the advice contained within the NPPF (paragraphs 187, 196 and 198).”

In light of this, this revised application is supported by a detailed Contamination Assessment

*“The preliminary contamination risk assessment has identified that a complete Source-Pathway- Receptor (SPR) linkages at the site is likely to exist as part of the proposed development with a worst case **Low** risk level from potential sources of ground gas and risk drivers identified on the site and surrounding area.*

There is the potential for the presence of inorganics, organics, hydrocarbons (PAH and TPH) in Made Ground at the site associated with historical uses and development on the site. However, given the significant redevelopment of the site around 1991, which included the construction of a basement, it is considered likely that any residual contamination associated with the historical timber yard will have been removed.

Further to the above, given there are no significant structural changes or areas of proposed soft landscaping incorporated into the proposed design, any residual contamination will remain encapsulated below the existing building and is unlikely to come into contact with future site users.

Additionally, the risk at the site as a result of migrating ground gas is considered to be low due to the distance from the site of the historical landfill (780m northeast) and the nearest area of potentially infilled land (364m southwest) along with the time that has lapsed (1970s and 1962 respectively), whereby the generation of ground gas from the decomposition of organic materials would have significantly diminished. It is also noted that the historical landfill site subsequently underwent remediation efforts, which would have addressed any residual contamination or gas risks, further minimising the likelihood of ground gas migration to surrounding areas.

*Given these factors, there is considered to be a potentially complete S-P-R linkage between any potential sources of ground gas within the vicinity of the site through ground gas migration and inhalation pathways. **However, the risk is considered to be LOW.** These potential contamination features are also deemed to pose a potential hazard to ecology and controlled waters, albeit with a very low risk level.*

Given the discussion above, the site is considered suitable for the proposed development and no further works with regards to contamination are considered necessary.

Further to this, should any unexpected contamination be identified during the future development groundworks, then a suitably qualified and experienced Geo-Environmental Engineer should be consulted and if necessary further assessment should be undertaken.

In light of the above we therefore respectfully suggest that there are no material issues relating to the change of use proposed on matters of ground contamination.

(c) Flood Risk

The site lies within a defined flood risk area and this application is therefore supported by a detailed Flood Risk Assessment undertaken by UK Flood Risk.

The previous application was refused, amongst other matters, in terms of such issues as set out below:

1. The submitted Flood Risk Assessment does not adequately assess the flood risks posed from the development. Therefore, the Council is not satisfied the proposed change of use of the building from office to a residential would not increase the risk of flooding to the future occupants of the building, moving from a "less vulnerable" to more "more vulnerable" classification. As such, the development is contrary to condition MA.2 (c) of Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development Order) (England) Order 2015 (as amended) and the advice contained within the NPPF (paragraph 181)

In light of the above an updated Flood Risk Assessment has been undertaken and for the sake of ease we set out its conclusions below.

The proposal comprises permitted development application for change of use under Class MA of the GPDO from Class E (office) to residential use at Abbey Wharf, 57-75 Kings Road, Reading RG1 3AB.

In accordance with the NPPF Guidelines, the proposed development use is categorised as 'more vulnerable'.

The site is located in close proximity to the River Kennet with the risk of fluvial flooding.

According to the information available from the Local Authority's SFRA and the Environment Agency, there were no records of flooding events at the site.

The Environment Agency's Flood Maps show that a small part of site (i.e. around the northern site boundary) lies within the Flood Zone 3 (i.e. high probability flooding). Flood Zone 3 fluvial outline shows a 1 in 100 chance of flooding at a location in any one given year (i.e., a 1% annual probability of flooding). The majority of the site is located within Flood Zone 1 (i.e. low probability flooding).

The site is located within an area that benefits from flood defences. Under the current scenario, considering the flood defences, the Environment Agency's flood map indicates that the site lies outside the flood extent of this watercourse. The site also remains outside the flood extent when the climate change scenario is considered. Similarly, if the flood defences are not considered, the Environment Agency's mapping shows that the site would fall outside of the flood extent of the watercourse. The site would also be outside of the flood extent under the climate change scenario without considering the flood defences.

An assessment of the Environment Agency's detailed modelling data indicated that under the defended scenario the site is not subject to flooding from the 5% AEP (1 in 20 year) event. Similarly, the site is not subject to flooding from any of the 1% AEP (1 in 100 year), 1% AEP (1 in 100 year) plus Climate Change and the 1% AEP (1 in 100 year) events. This implies that under the defended scenario the flood hazard from these extreme events is low.

Similarly, under the undefended (no defences exist) scenario the site is not subject to flooding from the 5% AEP (1 in 20 year) event. Also, the site is not subject to flooding from any of the 1% AEP (1 in 100 year) and the 1% AEP (1 in 100 year) plus Climate Change events. This implies that under the undefended scenario the flood hazard from these extreme events is low.

The Environment Agency has produced Flood Hazard Maps based on detailed modelling of flood depths and flow velocities. These maps provide a measure of the potential risk to life and property from fluvial flooding. The Flood Hazard Maps indicate that the site is located outside of the identified flood hazard zones, implying that flood hazard levels at the site are considered very low. As such, the site is not expected to be subject to significant flood depths or flow velocities during the modelled extreme fluvial flood events.

The Environment Agency's Surface Water Flood Risk Maps indicate that the site is located outside of the flood risk from the 1 in 30, 1 in 100 and 1 in 1000 surface water flood events. This implies that the overall risk of surface water flooding is 'low'.

The flood risk from other sources including underground water, sewer and reservoir is low.

In order to afford a level of protection against flooding it is normally recommended that finished floor levels are set a nominal 300mm above the 1 in 100-year annual probability fluvial flood (1% AEP) including an allowance for climate change. However, as the site is not subject to flood risk from the 1%AEP (1 in 100 year) plus Central Climate Change event, the finished floor level will be set at the current level and the residual flood risk will be mitigated by using the flood resilient measures and by utilising the Environment Agency's flood warning service available in the area.

In order to minimise the damage and to enable quick recovery and clean up after the flooding event, it is proposed that flood resilient measures will be implemented.

As the site is located within a flood zone area, it will be necessary to make sure that the occupants are fully aware of the flood risk and flood warning and evacuation during an extreme event. A site-specific Flood Evacuation Plan has been developed for the site to ensure the safety and well-being of the occupants by providing a clear, structured, and efficient response to flooding events

The Flood Evacuation Plan ensures that occupants are evacuated promptly and safely before the floodwaters pose a significant threat to life.

The occupants are advised to utilise the Environment Agency's Flood Warning Service available in the area.

The proposed development will not lead to any increase in the surface runoff from the site.

The development will not give rise to backwater affects or divert water towards other properties.

This report demonstrates that the proposal will be safe, in terms of flood risk, for its design life and will not increase the flood risk elsewhere."

Given the findings of this updated detailed assessment, we therefore submit that the conversion of this building to form 78 apartments would not result in any unacceptable impacts in terms of potential flood risk.

(d) Noise

In terms of the impacts of noise from commercial premises on the intended occupiers of the development, in this respect traffic noise cannot be an issue for consideration in Prior Notification applications under Part MA. When considering potential noise disturbance, the revised NPPF at paragraph at 180 advises:

180. Planning policies and decisions should contribute to and enhance the natural and local environment by:

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;

Paragraph 191 adds:

“191. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life”

The site lies in a mixed-use area with predominantly Class E commercial units nearby however the majority are in office use and on the opposite side of the road are serviced residential apartments (House of Fisher). On the opposite side of Duncan Place was the Aila Restaurant and bar which is now closed and we believe operates as a food store.

As such there are no significant noise generating land uses within the vicinity of the site however the previous application was refused, amongst other matters, in terms of such issues as set out below:

“The Local Planning Authority is not satisfied, based on the limited information provided and owing to the site contamination risk and nature of the surrounding uses, that the development would not result in a contamination risk and unacceptable levels of noise and disturbance to any potential future occupants of the building. As such, the development is contrary to condition MA.2 (b) and (d) of Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development Order) (England) Order 2015 (as amended) and the advice contained within the NPPF (paragraphs 187, 196 and 198).”

In light of the above a Noise Impact Assessment has been undertaken and for the sake of ease we set out its conclusions below.

“A baseline noise survey has been undertaken by Venta Acoustics to establish the prevailing noise climate in the locality of Abbey Wharf, 57-75 Kings Rd, Reading in support of a planning application for the proposed development of new residential dwellings.

The measured levels have been assessed against the National Planning Policy Framework and currently available standards and guidance documents including World Health Organisation Guidelines for Community Noise (1999) and BS8233:2014 Guidance on sound Insulation and noise.

When assessed using BS4142, noise from most activities on site have been shown to have impacts ranging from low to significantly adverse.

Night time revelry noise levels are also high and, along with commercial noise assessed under BS4142, would require windows to remain closed in order to meet the appropriate indoor noise

targets. Glazing specifications have been provided which would allow these targets to be met and to minimise adverse impacts on health and quality of life as a result of the new development. Notwithstanding this, glazing should remain openable at occupant preference.

Daytime noise levels on the first floor communal terrace at the rear of the building meet WHO 1999 and BS8233:2014 guidelines.

The proposed scheme is not expected to experience a significant adverse noise impact and the site is considered acceptable for the proposed residential use.”

In light of the above report, we submit that there is no reason to resist the change of use proposed in terms of matters of potential noise disturbance from commercial buildings and/or land uses in close proximity to the site.

(e) Conservation

The site lies outside of any defined Conservation Area and thereby no assessment of criterion (e) is required in terms of these proposals.

(f) Adequate Natural Light

This criterion requires an assessment in terms of each flat to be created relating to the provision of adequate natural light to proposed habitable rooms. There is no definition of *adequate* within the regulations, however only natural light is to be considered as opposed to direct sunlight or daylight. Reference to ‘adequate’ suggests merely satisfactory or acceptable in quality.

The building possesses significant fenestration to all floors and has a relatively open aspect and as shown on the proposed floor plans each of the habitable rooms proposed would be served by existing fenestration.

In addition, a detailed daylight assessment has been prepared to assess such matters and we set out its conclusions below:

“In order for Prior Approval under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 3, Class MA, MA.2.(f). requires the provision of adequate daylight in all habitable rooms and the analysis undertaken in accordance with Appendix C of BR209 (2022) demonstrates that the proposals accord with that guidance; in my Expert opinion, the provision for adequate daylight has been met.”

Given the above it is submitted that the proposed scheme would provide adequate natural light into all of the habitable rooms of all 78 of the proposed apartments and this is agreed by the LPA given the reasons for refusal of the previous application.

(g) The impact on 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; and

The site does not lie within such an area

(h) where the development involves the loss of services provided by—

(i) a registered nursery, or

(ii) a health centre maintained under section 2 or 3 of the National Health Service Act 2006(a), the impact on the local provision of the type of services lost.

The previous land use was not as a nursery or health centre and it is **therefore submitted that in such circumstances there is no conflict with this criterion.**

Apartment sizes

A further requirement of prior notification is that each flat proposed must achieve the minimum size standards as set out below:

In article 3, after paragraph (9) insert—

“(9A) Schedule 2 does not grant permission for, or authorise any development of, any new dwellinghouse—

(a) where the gross internal floor area is less than 37 square metres in size; or

(b) that does not comply with the nationally described space standard issued by the Department for Communities and Local Government on 27th March 2015(a).

(9B) The reference in paragraph (9A) to the nationally described space standard is to that standard read together with the notes dated 19th May 2016 which apply to it.”.

In terms of the above a schedule of accommodation supports this application which identifies the type of each of the 78 flats as proposed proposed dwellings against the NDSS standards.

On the basis of the above all 78 of the flats proposed are therefore compliant with NDSS standards and this is agreed by the LPA given the reasons for refusal of the previous application.

Part M.2.A requirements

Paragraph M.2A.(1) requires that the following provisions apply where a developer is required under paragraph M.2(f) to make an application to a local authority for a determination as to whether the prior approval of the authority will be required.

Sub paragraph (2) advises that the application must be accompanied by—

(a) a written description of the proposed development;

a detailed description of the proposal is set out on the application forms and within this covering letter as the conversion of this floorspace into 78 apartments.

(b) a plan indicating the site and showing the proposed development;

a plan indicating the location of the site and the floorspace within the building proposed to be converted accompanies this application.

(c) drawings prepared to an identified scale and showing—

the drawings have been prepared to an identified scale and show the detailed internal layout of the proposed dwellinghouse including window position and sizes.

(i) in the case of a building to be erected, the proposed external dimensions and elevations of that building; and

(ii) in the case of a building to be extended or altered, the external dimensions and elevations of that building both before and after the proposed extension or alteration;

It is not proposed to extend, alter or erect buildings on the site

(d) a written statement in respect of the heritage and archaeological considerations of the development;

The site does not lie within a conservation area.

(e) the developer's contact address;

Mountley Ltd c/o Allen Planning Ltd, The Old Fire Station EC, Salt Lane, Salisbury, SP1 1 DU

(f) the developer's email address if the developer is content to receive communications electronically; and

Mountley Ltd c/o Allen Planning Ltd– tony.allen@allenplanning.co.uk

(g) any fee required to be paid.

The fee of £19,500.00 will be paid via the planning portal.

Conclusions

In light of the information contained within this letter we submit that the change of use of this building to **form 78 apartments** from its permitted Class E use is wholly in accord with Class MA of the amended General Permitted Development Order and the Prior Notification Procedure.

This revised application and its suite of supporting documents successfully responds to the reasons for refusal of the previous submission.

If the Council require any further information, then please do not hesitate to contact me.

Yours sincerely

anthony allen

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