

DELEGATED APPLICATION REPORT

SITE ADDRESS: 20 Tudor Road, Reading, RG1 1NH

APPLICATION NUMBER: PL/25/0929

PROPOSAL: Change of use from Class E (offices) to C3 (dwelling houses) to comprise 58 flats (28 x 1b1p, 26 x 1b2p & 4 x 2b3p. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (amended by plans received on 11 August 2025).

TARGET DATE: 26/08/2025

Introduction

20 Tudor Road (Pinnacle) is a six-storey office building prominently located in Reading town centre at the junction of Tudor Road and Caversham Road, less than 150m from Reading Station. Town centre amenities and services are a short walk from the building, including The Oracle shopping centre. The mainline train station provides a fast and frequent service to London Paddington, with additional local and nationwide connections. The site is also well served by local bus services.

The site currently has a lawful use within Class E, having previously fallen within Use Class B1 (Office) prior to the introduction of the new Use Classes in September 2020. The site lies outside of a Conservation Area, is not a Listed Building, nor is the site situated on Article 4 Land. The site is situated on land partially within Flood Zone 2 and within the Air Quality Management Area (AQMA), with an underground car park comprising circa 35 spaces.

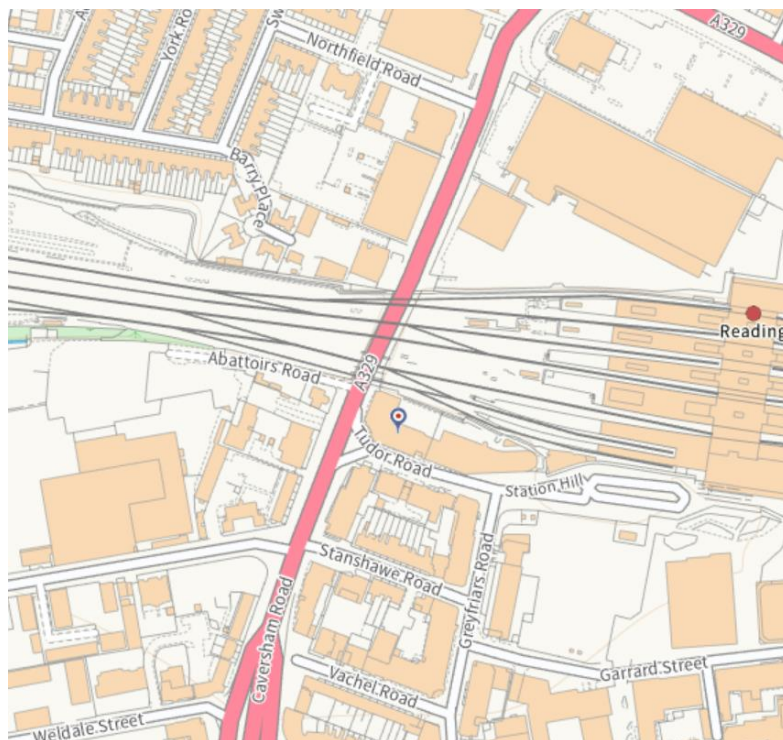


Figure 1: Site Location Plan



Figure 2: Application Building

Proposal

Prior approval was sought under Class MA Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) initially for the change of use of the whole building to 58 self-contained flats. However, amended plans were received on 11 August 2025 removing the top (fifth) floor from the proposal. This in turn has resulted in a reduction in the total number of proposed dwellings / flats from 70 to 58 (reduction of 12 units).

The building extends over six floors. The proposed residential internal layout is proposed as follows:

- Ground level: 1 x studio flat and 1 x 1 bed flat, 37 car parking spaces (4 electric charging spaces and 2 x disabled), 48 cycle spaces (7 x short term spaces), bin store (General Waste 9x1,100l bins, Recycling 9 x 1,100l bins and food waste 3 x 240l bins)
- First floor: 7 x studio flats, 6 x 1 bed flats and 1 x 2 bed flat
- Second floor: 7 x studio flats, 6 x 1 bed flats and 1 x 2 bed flat
- Third floor: 7 x studio flats, 6 x 1 bed flats and 1 x 2 bed flat
- Fourth floor: 7 x studio flats, 6 x 1 bed flats and 1 x 2 bed flat

Car and cycle parking will be provided at ground floor level, together with bin storage with access from Tudor Road.

The accommodation schedule is set out in the tables below.

Floor	Type (Bedrooms / persons) and unit numbers	Gross Internal Area (GIA) Square metres	National Described Space Standards (minimum)
Ground	1 bed 1 person x 1	44.32 m ²	37 m ²
Ground	1 bed 2 persons x 1	50.42 m ²	50 m ²
First, Second and Third Floors	1 bed 1 person x 18	37.42 – 43.67 m ²	37 m ²
First, Second and Third Floors	1 bed 2 persons x 21	50.00 – 55.44 m ²	50 m ²
First, Second and Third Floors	2 bed three persons x 3	61.03 m ²	61 m ²
Fourth Floor	1 bed 1 person x 7	39.01 – 42.17 m ²	37 m ²
Fourth Floor	1 bed 2 persons x 6	50.00 – 55.43 m ²	50 m ²
Fourth Floor	2 bed 3 persons x 1	61.03 m ²	61 m ²

Table 1: Accommodation schedule.

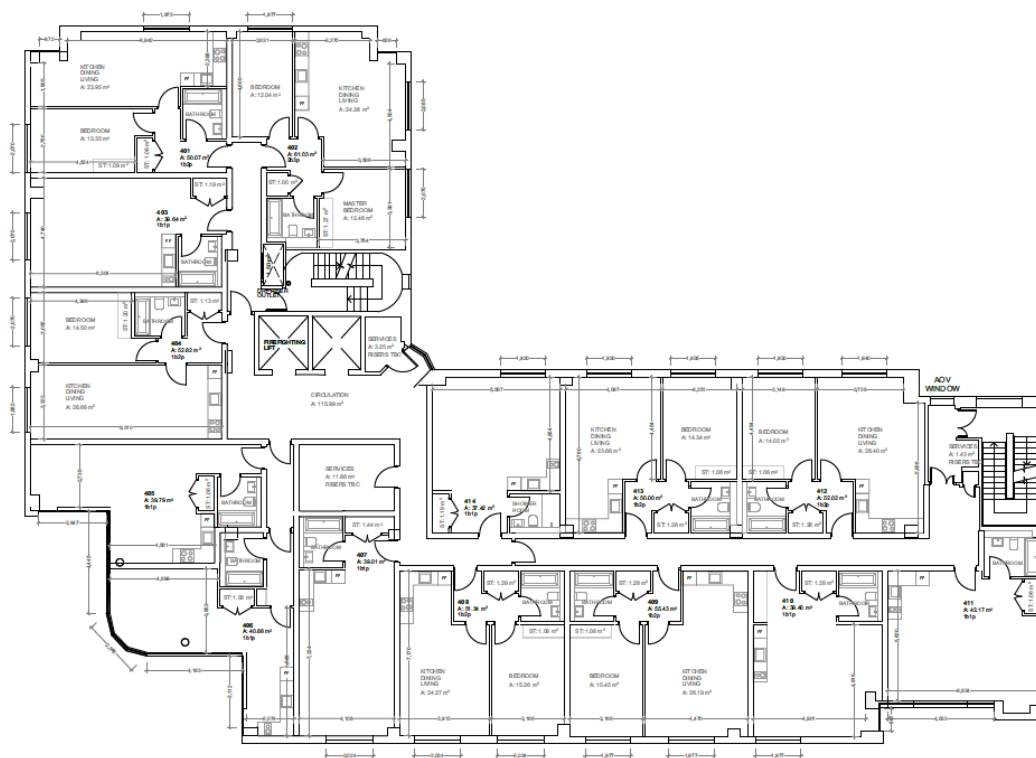


Figure 5: Proposed Fourth Floor Plan

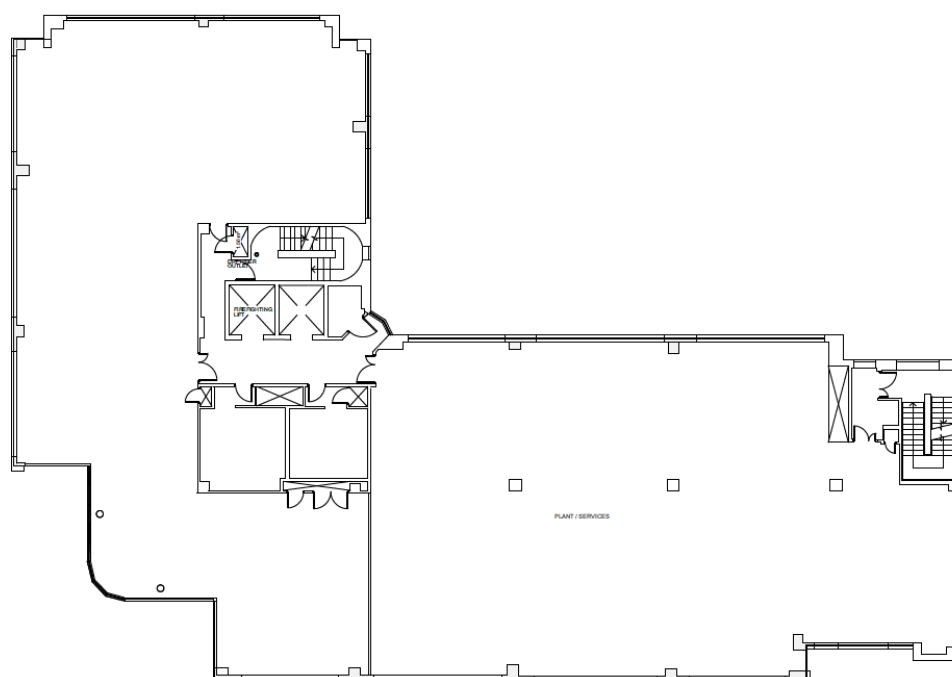


Figure 6: Fifth Floor Plan

Information Submitted

The completed application form, including a written summary of the proposed development and the developer's contact details.

Drawings and Documents ref.

- Prior Approval Notification Form
- CIL Form
- Planning Statement
- Fire Statement, prepared by BWC, reference: DN01, dated 23 June 2025, received on 01 July 2025
- Flood Risk Assessment, prepared by Nimbus Engineering Consultants Ltd, reference: C3586-R1-REV-A, dated June 2025, received on 01 July 2025
- Internal Daylight Assessment, prepared by Ollie Westover, reference: 6440 Issue 2, dated June 2025, received on 01 July 2025
- Ordnance Survey Map (Location Plan), drawing number 32508/P001 P01, received on 01 July 2025
- Existing Ground Floor Plan, drawing number 32508/P003, received on 10 August 2025
- Existing 1st, 2nd, and 3rd Floor Plan, drawing number 32508/P004, received on 10 August 2025
- Existing 4th Floor Plan, drawing number 32508/P005, received on 10 August 2025
- Existing 5th Floor Plan, drawing number 32508/P006, received on 10 August 2025
- Existing 6th Floor Plan, drawing number 32508/P007, received on 10 August 2025
- Existing Roof Plan, drawing number 32508/P008, received on 10 August 2025
- Existing Front Elevation, drawing number 32508/P009, received on 10 August 2025
- Existing Rear Elevation, drawing number 32508/P010, received on 10 August 2025
- Existing Side Elevations, drawing number 32508/P011, received on 10 August 2025
- Proposed Ground Floor Plan, drawing number 32508/P012, received on 10 August 2025
- Proposed 1st, 2nd, and 3rd Floor Plan, drawing number 32508/P013, received on 10 August 2025
- Proposed 4th Floor Plan, drawing number 32508/P014, received on 10 August 2025
- Proposed 5th Floor Plan, drawing number 32508/P015, received on 10 August 2025
- Proposed 6th Floor Plan, drawing number 32508/P016, received on 10 August 2025

- Proposed Roof Plan, drawing number 32508/P017, received on 10 August 2025
- Proposed Front Elevation, drawing number 32508/P018, received on 10 August 2025
- Proposed Rear Elevation, drawing number 32508/P019, received on 10 August 2025
- Proposed Side Elevations, drawing number 32508/P020, received on 10 August 2025
- Schedule of Accommodation, drawing number 32508/P21, received on 10 August 2025

Policy Context

Legal context

The application has been submitted to determine whether prior approval is required in accordance with Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). Class MA involves 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.

Before development can be carried out under Class MA, the developer must submit a Prior Notification to determine if 'Prior Approval' of the Local Planning Authority is required in respect of the following matters:

- (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 the impact on the local provision of the type of services lost.
- (i) where the development meets the fire risk condition, the fire safety impacts on the intended occupants of the building

Class MA requires development to be completed within a period of 3 years starting with the prior approval date. 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.

If the Local Planning Authority determine that Prior Approval is required, Paragraph W of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) states that the Local Planning Authority should, when determining an application, have regard to the National Planning Policy Framework (NPPF), 'so far as relevant to the subject matter of the prior approval, as if the application were a planning application' (Paragraph W, para 10b).

Planning History

- PL/90/1230 - 4 and 5 storey offices over street level car parking and office access. Highway improvements, road widening junction of Tudor Road and Caversham Road.
- PL/17/0266 - Notification for Prior Approval for installation of Solar PV equipment. Notification under Schedule 2, Part 14 Class J of the Town and Country Planning (General Permitted Development) (England) Order 2015. Permitted – 13/04/2017.
- PL/17/1777 - Construction of a new shower block (including new plant equipment) within the undercroft car park and additional cycle racks (loss of 4 parking spaces) (amended description). Permitted – 18/12/2017.

Consultations

Environment Agency (EA): No comments: Flood Risk Standing Advice applies.

Transport (RBC): No objection.

Environmental Protection (RBC): No objection, subject to condition and informative.

Waste Services (RBC): No objection, condition recommended (submission of written refuse strategy - when and where the bins would be presented and by whom).

Health and Safety Executive (HSE): No response.

Publicity

A site notice was displayed at the application site on 18 July 2025. No comments were received.

Appraisal

The proposal comprises the change of use of the building from Class E (office) to Class C3 (dwellinghouse) with the proposal to be considered against the criteria and conditions contained within Part 3, of Class MA.1. (1) (a)-(g), of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

In addition, to qualify for assessment under Class MA, all applications submitted under this class from 6th April 2021 must comply with Department for Communities and Local Government's Technical Housing Standards – Nationally Described Space Standards, minimum space standards. As the application was received after the 6th April 2021 there is a requirement to comply with these minimum space standards. It can be confirmed that the proposed units comply with these minimum space standards as illustrated in the accompanying plans and the accommodation schedule. All units also include storage / cupboard spaces.

Criteria MA.1.—(1)

Parts (a) (three-month vacancy) and (c) (Floorspace qualification) were removed from the legislation on 5th March 2024 and so are no longer assessed.

(b) Previous use qualification – “*unless the use of the building fell within one or more of the classes specified in subparagraph (2) for a continuous period of at least 2 years 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.

(d) Land designation criteria – “*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 does not form part of a site of special scientific interest, listed building nor land within its curtilage, a Scheduled monument or land within its curtilage, safety hazard area, nor military explosive storage area.

(e) Landscape designation criteria – “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;**
- (iii) the Broads;**
- (iv) a National Park; or**
- (v) a World Heritage Site;”**

It can be confirmed the site is not within a landscape designation criteria.

(f) Agricultural tenancy criteria – “If the site is occupied under an agricultural tenancy, unless the express consent of both the landlord and the tenant has been obtained;”

It can be confirmed the site is not occupied under an agricultural tenancy.

(g) Previous use criteria - “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 applicable to proposal.

Conditions

MA.2.—(1) Confirms that development under Class MA is permitted subject to the condition that before beginning the 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—

- (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,
 the impact on the local provision of the type of services lost.
- (i) where the development meets the fire risk condition, the fire safety impacts on the intended occupants of the building and the provisions of paragraph W (prior approval) apply in relation to that application.

Assessment of MA.2.—(1)

(a) Transport impacts of the development, particularly to ensure safe site access

The Council's Transport Team raise no objection to prior approval, with the proposal providing 37 on-site car parking spaces and a further 48 secure covered cycle parking spaces.

The Council's Transportation Strategy Team have advised that whilst the proposal would generate additional pressure for parking in the area, the site lies within the Council's Residential Permit Parking Scheme, and it has been recommended that a condition be applied to any potential permission that no future residents of the building would be given a resident or visitor parking permit. (This would usually also be added as an informative too). This is to ensure the development does not harm the existing amenities of the neighbouring residential properties by adding to the already high level of on-street car parking in the area.

The proposed development, with the permit parking restriction, is not considered to materially increase vehicle parking movements nor change the existing access and egress arrangements presently operating on the site. As such, the proposal is not considered to have any adverse transportation impacts.

(b) Contamination risks in relation to the building

The application site is not situated on land known to be at risk of contamination and the proposal is for a change of use only, with no physical alterations to the external elevations of the building or groundwork sought. However, the development lies adjacent to the site of an historic warehouse/malthouse, which has the potential to have caused contamination. . On this basis, the Council's Environmental Protection Team have recommended both a condition and informative relating to unidentified

contamination. Subject to the recommended condition, the development is not considered to amount to any unacceptable risks in relation to contamination.

(c) Flooding risks in relation to the building

The site is located within Flood Zone 2 and with the proposal being for a change of use of existing offices (Class E) to flats (C3 – dwellinghouses, the Environment Agency have advised the proposal have declined to respond to the consultation and have referred that LPA to its Standing Advice). Under Annex 3 (Flood risk vulnerability classification) of the NPPF it sets out flood risk vulnerability classification. Offices come under the 'Less Vulnerable' category whereas dwellinghouses come under the 'More Vulnerable' category. Therefore, the proposed change of use would increase the flood risk vulnerability.

A Flood Risk Assessment has been submitted in support of the application, setting out the various flood risks relating to the development proposal (tidal, overland, groundwater, sewers and reservoirs), including safe access and egress arrangements and mitigation and flood resilience measures. An assessment in terms of the potential various flooding sources is set out below.

Fluvial or Tidal Flooding

The site is located north of the River Kennet, and south of the River Thames, with the submitted Flood Risk Assessment noting the risk of fluvial flooding is caused by the River Thames based on Environment Agency data. Owing to the site's location away from the coast there is no risk of tidal flooding.

Overland Flow

The Flood Risk Assessment sets out that the proposed development is at a low risk of surface water flooding, with supporting surface water flood maps provided from Environment Agency's website (set out below).

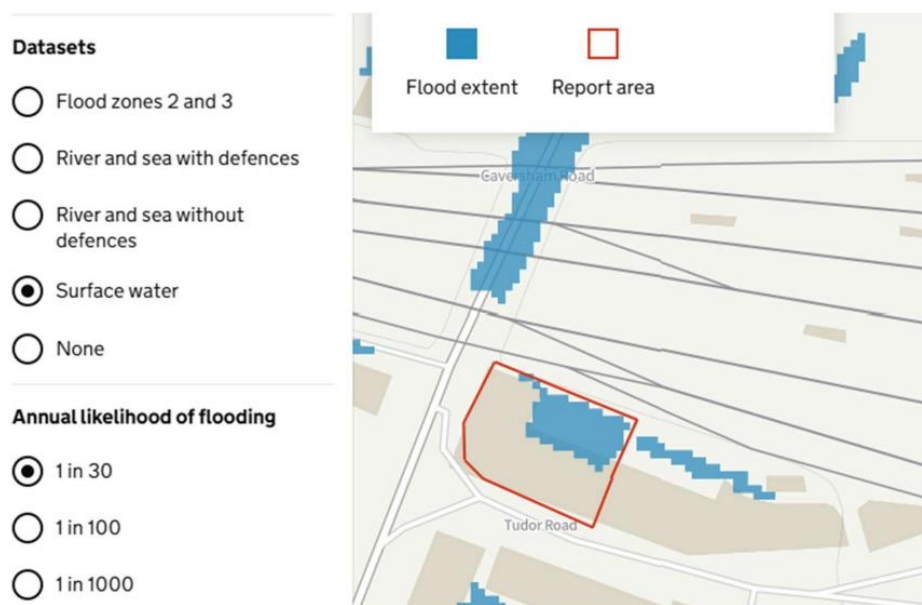


Figure 7: Surface Water Flooding 1 in 30 years

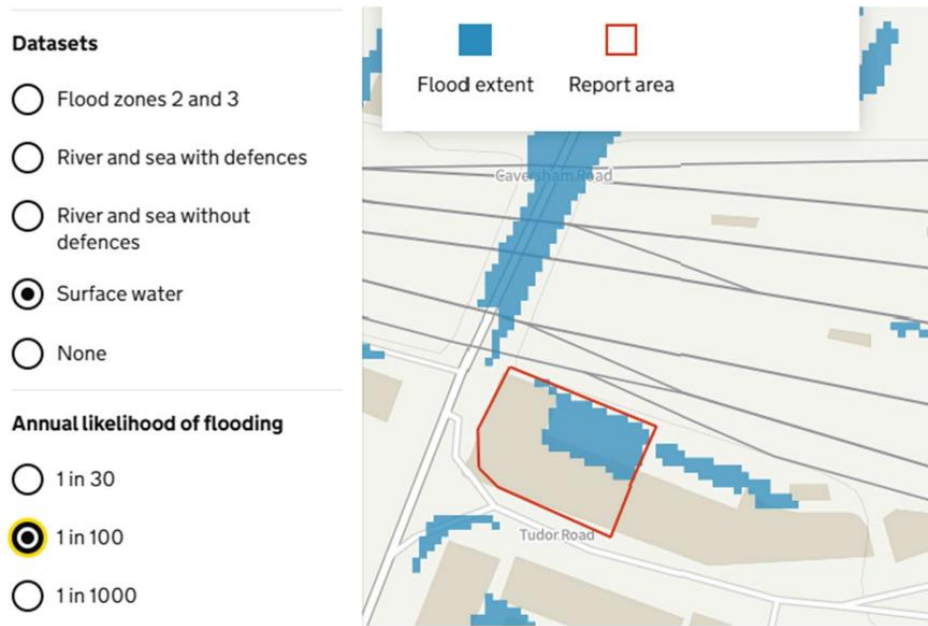


Figure 8: Surface Water Flooding 1 in 100 years

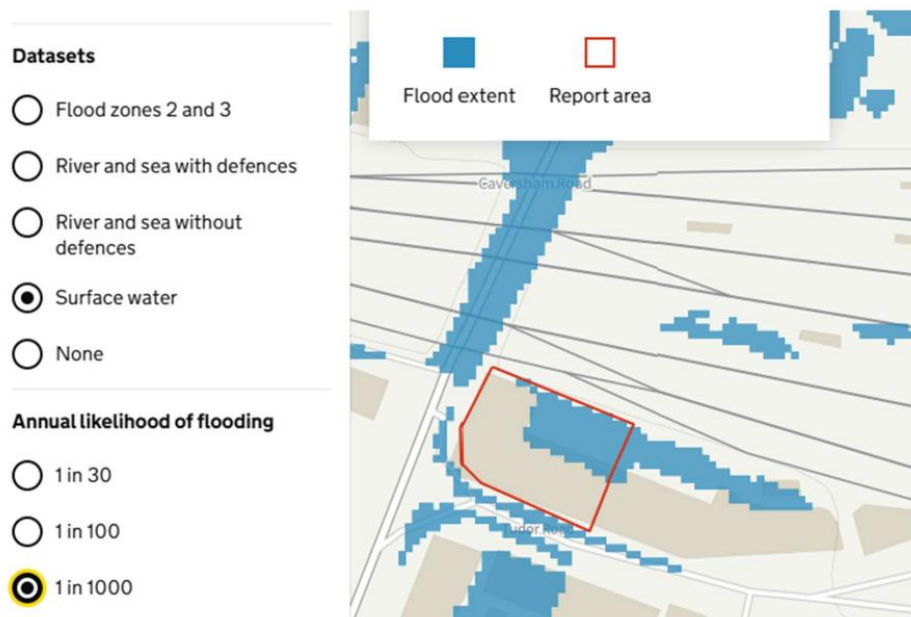


Figure 9: Surface Water Flooding 1 in 100 years

The figures above show a degree of surface water flooding on the site, with an area of surface water flooding external to the building, between the building's rear elevation and the railway line. The 1 in 100 and 1 in 1000 likelihood of surface water flooding figures (Figures 8 & 9) show a small area of surface water flooding potential along the building's frontage on the corner of the site at the junction of Caversham Road (the IDR) and Tudor Road.

The information provided within the Flood Risk Assessment relating to surface water flooding notes that there are areas of surface water flooding to the rear of the site and notes that this is caused by water ponding in naturally low lying areas at the site and this surface water flooding area only extends to under the undercroft car parking area, and will not enter the building. In addition, the main entrance is not affected by this surface water flood risk, therefore no flood water will enter the building.

It is also advised within the Flood Risk Assessment that the surface water flooding levels at the front of the site would unlikely have a maximum higher than 250mm for the 1 in 1000-year storm event.

Flooding from Groundwater

The Environment Agency's website confirms that groundwater flooding is unlikely in this area. As the proposals are for internal changes and reconfiguration, there will be no excavations proposed.

Flooding from Sewers

The Council's own Strategic Flood Risk Assessment (Reading Level 1 Strategic Flood Risk Assessment, November 2024) shows a small number (14) internal (7) and external (7) of recorded flooding incidents from sewers since 1989. There are no known flooding from sewers risks at the application site. The likelihood of flooding from sewers at the application site is very low.

Flooding from Reservoirs

There is a risk of reservoir flooding to this site, as demonstrated on the Environment Agency's website and shown in figure 10 below. However, this is stated in the submitted Flood Risk Assessment to be very low, and flood warning measures are in place. As such, the risk of flooding from reservoirs is also limited.

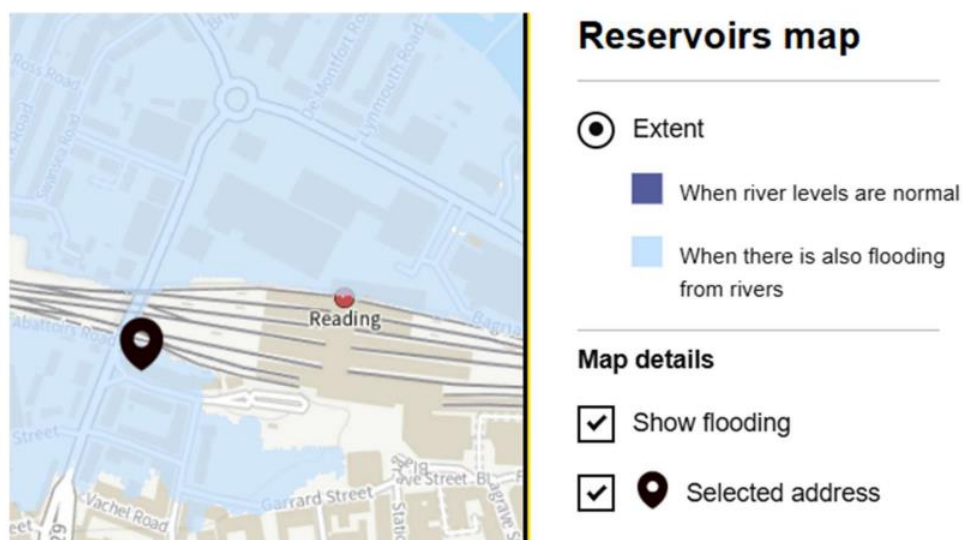


Figure 10: Environment Agency Reservoir Flood Map, 1 in 1000-year storm event, for the proposed development.

Safe Access and Egress

The change of use proposal would increase the flooding vulnerability risk of the building and it has been seen that there is a low risk of fluvial and pluvial flooding. As such, safe access and egress during extreme fluvial and pluvial events requires consideration.

The Flood Risk Assessment advises that fluvial flooding events will restrict access and egress to the site, and, in these circumstances, residents will be advised to remain in their properties once a flood warning has been issued. The Flood Risk Assessment goes on to set out that residents need to be made aware of hidden dangers during any extreme fluvial and pluvial events, such as blown manholes and any potential future occupants will be required to sign up to the Environment Agency's Flood Line to receive flood warnings, as well as making sure they are aware of any extreme storm events that may cause surface water flooding.

Environment Agency Standing Advice

The Environment Agency's Standing Advice is applicable to this application, being a change of use proposal development within Flood Zone 2 that has a vulnerability classification of 'more vulnerable'. The Standing Advice produced by the Environment Agency covers several factors, including what to include in a Flood Risk Assessment, flood resistance and resilience measures and access and escape. These are covered in the sections below.

What to include in the Flood Risk Assessment

The standing advice sets out that the Flood Risk Assessment should include:

- the site address
- a description of the development
- the estimated flood level for your development, taking into account the impacts of climate change over its lifetime
- details of the finished floor levels
- details of your flood resistance and resilience plans
- any supporting plans and drawings
- any other information the relevant standing advice tells you to include

The submitted Flood Risk Assessment sets out the site address, description of the proposal and provides supporting plans as an appendix. However, the Flood Risk Assessment does not provide estimated flood levels for the development, considering the impacts of climate change over the development's lifetime nor do the submitted plans provide the finished floor levels for the proposed ground floor residential units or details of any flood resistance and resilience plans.

In terms of floor levels, the standing advice recommends that floor levels are set at least 600mm above the estimated floor level and flood resistant materials are used up to at least 600mm above the estimated floor level. Without knowing the flood level and proposed finished floor level of the proposed units it is not possible to ascertain the extent of the flood risk.

Considering the absent information, officers have significant concerns are raised to the suitability and credibility of the coverage of the submitted Flood Risk Assessment.

Flood resistance and resilience measures

This section of the Standing Advice provides information on what to do if finished floor levels cannot be raised to the required height, which is potentially the case in this instance being a change of use proposal. In such instances, the advice requires buildings are designed to prioritise excluding water, and, where possible, the speed recovery in cases where water gets in.

The submitted Flood Risk Assessment has a section entitled 'Mitigation and Resilience Measures' (Section 6), but this section is blank with no supporting information. Therefore, officers cannot conclude whether any mitigation and resilience measures are being proposed or not.

Access and Escape

The Environment Agency's Standing Advice, in respect of access and escape, advises that proposals need to provide details of emergency access and escape plans if any part of the development is below the estimated flood level. This includes access and escape routes. The submitted Flood Risk Assessment neither provides details of emergency access and escape plans, nor confirms that the proposed finished floor levels for the ground floor units are not below the estimated flood level.

For reasons relating to the lack of information and required detail in the submitted Flood Risk Assessment, officers are not satisfied that the proposed change of use of the building would not increase the risk of flooding to the proposed future occupants of the building, over and above the building's existing use. The development is therefore 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).

(d) Impacts of noise from commercial premises on the intended occupiers of the development

The surrounding area is a mixture of commercial and residential uses. Some level of noise is expected within a town centre location. RBC Environmental Protection Officers have reviewed the proposal and advised that the site is affected by significant

noise sources (busy road) and rail. However, a noise assessment cannot be required under this prior approval, but to provide good quality and healthy accommodation, it has been recommended that the developer ensures suitable windows and ventilation are selected to protect occupants from high levels of external noise and follows the guidance in BS8233.

Aside from the road and rail noise sources, there are no existing commercial premises in the area that would result in unacceptable impacts on any potential future occupants of the development in terms of noise.

Were this MA application otherwise approvable, an informative in relation to proximity to the railway line and making contact with NR in relation to e.g. lighting would be prudent, for rail safety reasons.

(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;

The site is not located within a conservation area.

(f) the provision of adequate natural light in all habitable rooms of the dwellinghouses

Statutory Instrument 2020:632 introduces the requirement that consideration is given in respect to the provision of adequate natural light in all habitable rooms. This requires examination of the detailed floor plans and a judgement to be exercised as to whether appropriate levels of light can be achieved to rooms used for sleeping or living. This excludes bathrooms, service rooms, corridor, laundry rooms and hallways.

All rooms used for sleeping or living within the proposed development would be served by good sized windows.

An internal lighting assessment has been submitted with the application, and this demonstrates that all rooms receive adequate levels of natural light. This assessment demonstrates the living, kitchen and bedroom spaces achieve adequate natural light levels.

Officers are satisfied that the proposal will provide adequate natural light to 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

The site is not within a core employment area or located 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.

(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, the impact on the local provision of the type of services lost.

The development would not result in the loss of services provided by a registered nursery, or health centre maintained under the relevant sections.

(i) where the development meets the fire risk condition, the fire safety impacts on the intended occupants of the building

A Fire Statement would be required if the development involves the development of an existing 'relevant building'. These new criteria applies to a building which satisfies the height condition in paragraph (3) of the Procedure Order and contains—

- (a) two or more dwellings; or
- (b) educational accommodation.

Paragraph (3) states the height condition is that— (a) the building is 18 metres or more in height; or (b) the building contains 7 or more storeys.

The height of the building exceeds 18 metres, and the change of use proposal would be for more than two dwellings. As such, a Fire Statement is required as part of the proposal.

A Fire Statement has been provided in support of this proposal that demonstrates a level of fire safety equal to or greater than the general standard implied by compliance with the recommendations in Approved Document B, Volume 1 (including up to 2025 Amendments). This level of safety therefore satisfies the functional requirements of the Building Regulations relating to fire safety. As the proposals show that Building Regulation standards in relation to fire safety are met and by extension, the planning requirements for fire safety are also addressed.

Officers are satisfied that the development meets the fire risk condition and the fire safety impacts on any future residents of the building are not unacceptable

Recommendation:

Prior Approval is REQUIRED and REFUSED, for the following reason:

- 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).