

DELEGATED APPLICATION REPORT

SITE ADDRESS: Alexander House 205-207 Kings Road Reading RG1 4LS

WARD: Park

APPLICATION NUMBER: PL/25/0985

PROPOSAL: Change of use from Class E (offices) to Class C3 (dwelling houses) at part basement floor level to comprise 6 residential units and cycle parking. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).

APPLICANT: BMR Property Group

DATE RECEIVED: 10/07/2025

TARGET DATE: 04/09/2025

CASE OFFICER: Jonathan Markwell

1. Introduction

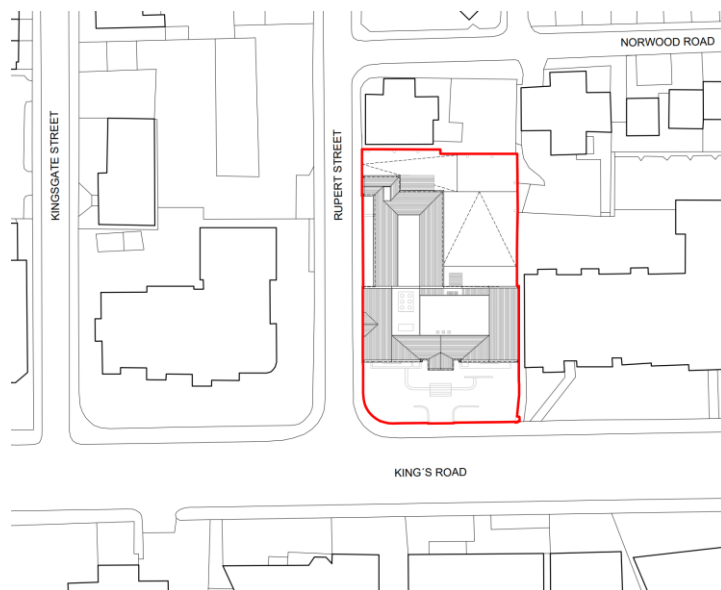
- 1.1 The application site was previously a basement and 2-storey office building, but as per the officer site visit on 05/08/2025 is now a basement and 4-storey former office building, which is in the process of being converted into residential units following various recent applications (see additional context and relevant history sections below). The site is located on the junction of Kings Road and Rupert Street to the east of Reading town centre. The pre-existing building was constructed in the early 1990s as part of a wider development which also included the residential units of Saxon Court to the north, on the junction of Rupert Street and Norwood Road. The building is 'L' shaped, fronting onto both Kings Road and Rupert Street, with vehicular access from the latter to a basement car park.



Alexander House from the junction of Kings Rd & Rupert St (left: 9/5/22; right: 5/8/25)



The rear of the site, from Norwood Road, looking south (left: 9/5/2022; right 5/8/25).



Location Plan submitted with the application.

1.2 This application site is within Park ward, although the boundary with Thames ward is Rupert Street and the boundary with Redlands ward is Kings Road. The site is also within an air quality management area. Kings Road is a major transport corridor into and out of Reading and is also designated as a 'treed corridor' in the adopted 2021 adopted Borough Tree Strategy.

1.3 The site is not within a conservation area, although it is relatively close to three. The nearest conservation areas are Alexandra Road (170m to the south), Eldon Square (220m to the west) and South Park (260m to the south-east). The application site is located outside of the designated Reading Central Area (the boundary being the grounds of Reading College 80m to the west) and outside the designated Cemetery Junction District Centre (the boundary being the former Arthur Hill Pool – now residential, 75m to the east). The application site does not include any designated heritage assets, although the following are within the vicinity of the site:

- 149 London Road – Gladstone Club, Grade II listed building 30m to south-east of the application site;
- Wycliffe Baptist Church (233 Kings Road) Grade II listed building 110m to the east of the application site
- Entrance Lodges and Gates to Reading Cemetery (London Road) Grade II listed 240m to the east of the application site
- Reading Cemetery Grade II listed park and garden, 250m to the east of the application site

1.4 The surrounding area comprises a mix of uses, predominantly residential, with office and retail/related uses in the wider immediate area. Both neighbouring buildings on the Kings Road frontage are in residential use, comprising The Pinnacle (approved in 2001) and Crossway Point (approved in 2003). Both are up to seven storeys in height. On Rupert

Street, the neighbouring Saxon Court residential block is three storeys in height, typical of the more domestic scale in the area to the north of the site.

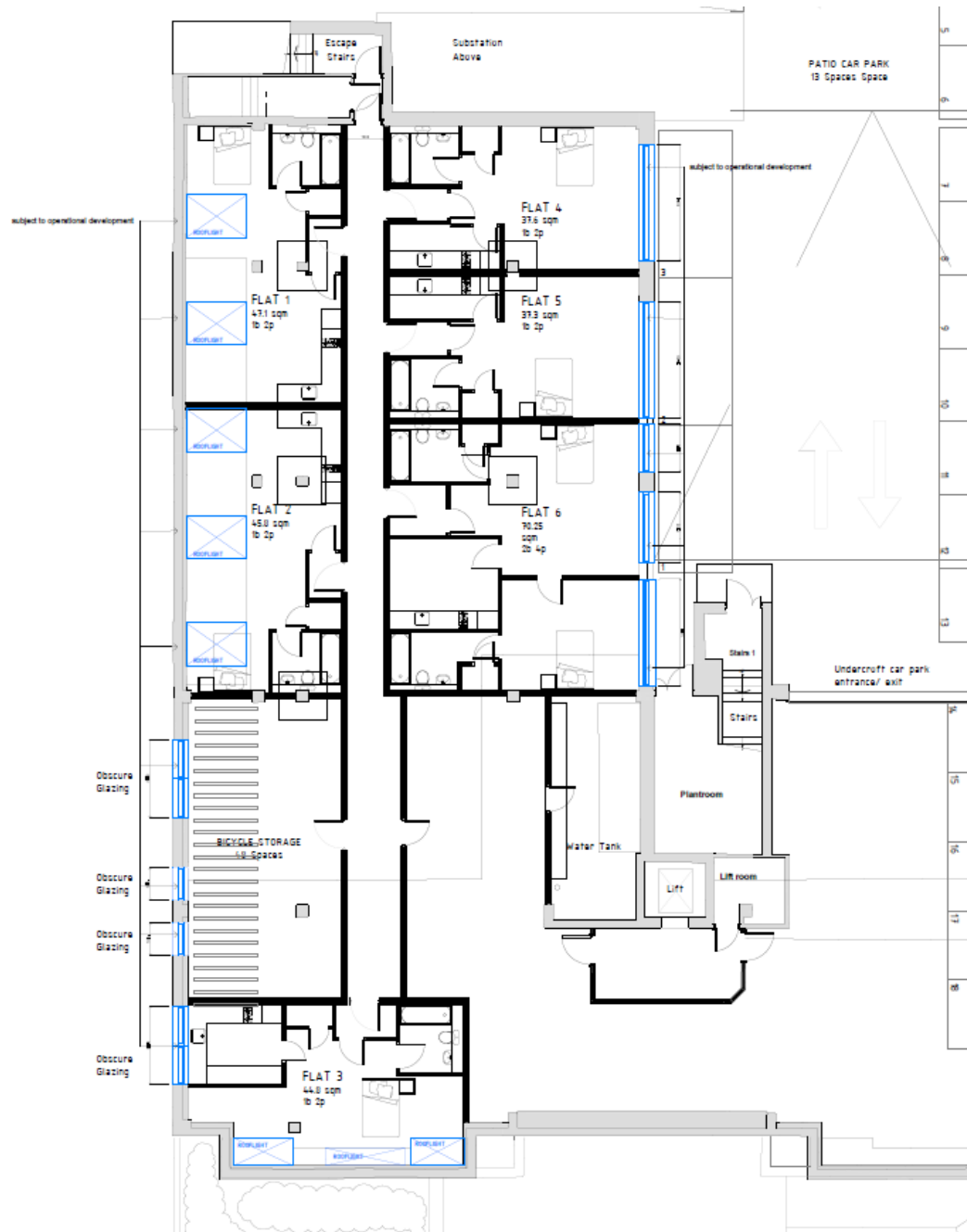
- 1.5 The site falls **outside** of the Article 4 area within Reading, which restricts prior approval changes of use.
- 1.6 The site is wholly within Flood Zone 1.
- 1.7 Additional context – given the succession of various types of application at the site in recent years, these are specified in full below:
- 1.8 Part 1: The ground and first floor of the building (minus a small area on each floor without windows marked as storage) benefits from a permitted change under Class O of use to 22 residential units under 210536/OPA in June 2021. A separate prior approval under Class MA for 22 flats under 230400/EPA was issued in May 2023. Based on the officer site visit on 05/08/2025 it would appear that these works are in the process of being implemented, although they have not been completed, with no units at the site being occupied at that time. Owing to the 2023 prior approval, the owner has until 17/05/2026 to complete the works (condition 1 of 230400).
- 1.9 Part 2: Separate full planning permission was obtained under 210885/FUL for physical external works to the building. Namely, building up the existing first floor walls to provide vertical walls for a new second floor (roof level) thereby creating 203 sqm of additional usable floorspace within the building. The application also included the introduction of additional windows on the existing first and second floor (roof level) façade and additional balconies to serve internal ‘storage’ space not provided for by external windows. A section 73 permission was granted on 04/06/2024 to 210885/FUL to alter windows and doors on all floors and elevations, provide brick banding detailing at the newly created floor level, increase the width of the addition on the northern elevation, make amendments to the height of the building and other associated works (Ref 231792/VARIAT). Accordingly, condition 2 (approved plans) was re-worded on the 231792/VARIAT decision notice to reflect the updated plans. Based on the officer site visit on 05/08/2025, externally it would appear that these works have taken place at the site.
- 1.10 Part 3: Planning permission was granted following the completion of a s106 legal agreement on 10/11/2022 for a roof addition to add a further storey of accommodation, comprising 8 residential units (ref 210902). Based on the officer site visit on 05/08/2025 it would appear that these works are in the process of being implemented, although they have not been completed and the units are not yet occupied. A section 73 permission was granted on 23/05/2024 to alter windows and doors on all floors and elevations, provide brick banding detailing below the new floor, remove the permitted roof terrace, provide 9 air source heat pumps and 2 opening vents at roof level, revise the escape staircase, amend the height of the building and various

other associated works (Ref 231801/VARIAT). Based on the officer site visit on 05/08/2025 it would appear that at least some of those works have been completed.

- 1.11 Part 4: On 22/11/2022 prior approval was allowed on appeal under Class O (Reference 210906/OPA) for a change the use of the roof level and those parts marked as 'storage' within the ground and first floor from office to residential comprising 13 residential units (11 within the roofspace of the building – as per the part 2 works - and a further 2 units on Ground and 1st Floor. Based on the officer site visit on 05/08/2025 it would appear that these works are in the process of being implemented, although they have not been completed, with no units at the site being occupied at that time. The owner has until 22/11/2025 to complete the works (as per paragraph 23 of the appeal decision). The previous application PL/24/0791 was granted permission to vary condition 1 of the decision allowed on appeal for the prior approval.
- 1.12 Accordingly, permissions/approvals are in place for 24 units at ground and first floor level (22 under 210536 or 230400, with 2 included as part of 210906), 11 units at second floor level (through 210885 [varied by 231792] and 210906 and 8 units within the roofspace (through 210902 [varied by 231801])). Accordingly, with all permissions/approvals in place a total of 43 dwellings are possible at the site.
- 1.13 Part 5: A prior approval (PL/24/1285) for 6 additional residential units in the basement floor and a separate but associated application for full planning permission for window works (PL/25/1284) to facilitate the prior approval were refused on 28/11/2024. A further prior approval submission of this proposal forms this application. A separate application for full planning permission for window works has been received by the Local Planning Authority, but is presently invalid (Ref PL/25/0983). As a result the whole building is effectively either in the process of becoming, or proposed to be changed into residential use.

Proposal

- 2.1 Prior approval is sought under Class MA Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) for the change of use from Class E (offices) to Class C3 (dwelling houses) at part basement floor level to comprise 6 residential units and cycle parking.
- 2.2 More specifically, 5 x 1 bedroom, 2 person residential flats and 1 x 2-bedroom, 4 person residential flat is proposed. These are as per paragraph 3.2 of the Planning Statement submitted with the application. The applicant specifies that 48 cycle spaces are proposed at basement level. The proposed basement level floor plan submitted with the application is shown below:



- 2.3 The submission also specifies that a series of new external openings are proposed as “operational development”, with this part of a separate application which the applicant says has been submitted simultaneously. As per the history section below, whilst the Council can confirm that such an application has indeed been submitted, it is presently an invalid application and not under consideration at the time of writing. The applicant has outlined a proposal for a condition as part of this application restricting the commencement of the use until the details contained within the external works plans (subject to the separate received but currently invalid application) were complete. This position has been outlined in full by the applicant within the supporting Planning Statement, as follows:

- 3.3 To enable the conversion of the basement space to residential use, the proposal is to introduce new external openings in the façade of the existing building in order that the proposed dwellings receive adequate natural light. The details of these external amendments are shown on the enclosed plans and highlighted in blue as areas of “operational development”. The commencement of the residential C3 use will be subject to the completion of the operational development detailed on the enclosed plans.
- 3.4 The operational development is included within an application for planning permission submitted simultaneously to this submission and will consist of works to Alexander House to create additional windows on the existing façade.
- 3.5 As stated above, the residential use of the internal area of the basement will not commence until the operation development is complete. The applicant would accept a suitably worded planning condition on the Decision Notice restricting the commencement of the use until the details contained within the external works plans were complete. This will ensure that the residential dwellings created are compliant with the conditions of Class MA.
- 3.6 This is an entirely lawful approach to the delivery and implementation of permitted development against Class MA. To assist the determination of the enclosed proposal, attached at Appendix 1 is the Appeal inspector decision attached to existing Prior Approval permission no. 210906 within which the approach outlined above was confirmed as lawful with reference to previous Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.

3. Information Submitted

- Completed application form (Portal Ref PP-14160772), dated 08/07/2025
- Completed CIL form - Community Infrastructure Levy (CIL) - Form 1: CIL Additional Information, dated 08/07/2024
- Planning Statement ‘Alexander House Prior Approval Basement Planning Statement’ by HCH Projects, undated
- 205-207 King’s Road, Reading Internal Daylight and Sunlight Report by Point 2 Surveyors Limited, Ref 3796 Version V2, dated 08/07/2025
- AHR_PA1 001 Rev 0 – Existing Location Plan
- 2023-258-002 – Location Plan (Actually the Proposed Site Block Plan)
- 2023-258-003 - Existing & Proposed Basement
- 2023-258-005 - Proposed Elevation A & B
- 2023-258-006 - Proposed Elevation C & D
- 2023-258-008 - Proposed Elevation C & D (Actually the pre-existing elevations with the “subject to operational development” additions)
As all received on 10/07/2025

4. Policy Context

4.1 Legal context

- 4.2 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.

- 4.3 In order to qualify for assessment under Class MA, all applications submitted from 6th April 2021 must comply with the DCLG's Technical Housing Standards – Nationally Described Space Standards, as per part 9A of Article 3 of the GPDO. In addition, 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

- 4.4 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.

- 4.5 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).

5. Planning History

- 5.1 PL/96/87/TP/1249 - Erection of office block with associated car parking and 7 dwellings with associated car parking. Refused outline permission on 15/01/1988. Allowed on appeal 10/11/1989.
- 5.2 89-01366-REM (891332) - Construction of office building together with associated car park and 7 no. dwellings with associated car parking. Reserved Matters Approved 28/03/1990.
- 5.3 90-00531-FUL (901103) - Erection of two storey office block with semi-basement car park for 50 cars and two storey block of 7 flats with associated parking. Granted 23/08/1990.
- 5.4 162057/FUL - Erection of basement and 4 - 7 storey building comprising 56 (30x1, 18x2 & 8x3-bed) residential units (Class C3) with associated parking and landscaping, following demolition of existing basement and 2 storey office building (Class B1a). Granted following completion of s106 legal agreement 17/05/2017. Not implemented.
- 5.5 190160/FUL - Demolition of existing office building and construction of new 182 bed student accommodation development, over 7 storeys of accommodation plus lower ground floor, together with ancillary landscaping, parking. Refused 19/07/2019. Dismissed at Appeal [Ref APP/E0345/W/19/3242252] on 19/11/2020.
- 5.6 210536/OPA - Change of use from office use Class B1(a) to use Class C3 to comprise 22 residential units. Prior Notification under Class 0, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015. Granted 25/06/2021. Referenced above as 'part 1'.
- 5.7 210885/FUL - Roof alterations and external elevation works. Granted 24/08/2021. Referenced at section 2 above as 'part 2'.
- 5.8 210906/OPA - Change of use from office use Class B1a to residential use Class C3 to create 13 new residential dwellings. These are created 11 within the roofspace of the building and a further 2 units on Ground and 1st Floor. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015. Refused 28/07/2021. Appeal APP/E0345/W/22/3291549 allowed on 22/11/2022. Referenced above as 'part 4'.
- 5.9 210902/FUL - Construction of new residential floor above existing roof level to create new residential use Class C3 to comprise 8 residential units. Granted following completion of s106 legal agreement on 10/11/2022. Referenced above as 'part 3'.

- 5.10 230400/EPA - Change of use from Class E (offices) to C3 (dwelling houses) to comprise 22 Flats. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015. Granted 17/05/2023. Referenced above as 'part 1'.
- 5.11 230656 - Application for approval of details reserved by condition 4 (Construction Environmental Management Plan and Construction Phase Plan) of Application 210902. Condition discharged 22/12/2023.
- 5.12 230671 - Application for approval of details reserved by condition 3 (schedule of materials) of Application 210902. Condition discharged 16/04/2024.
- 5.13 230819 - Discharge of condition 5 (Design stage SAP submission) of planning permission 210902, as granted on 10/11/2022. Condition discharged 15/08/2024.
- 5.14 230820 - Non-material amendments to permission 210902 (granted on 10/11/22 to provide 8 residential units above the existing roof level) to increase the height of the building by 1.7m, provide a further fire escape access point at roof level adjacent to the north elevation of the Rupert Street elevation and alter all windows and doors to all floors of the building. Withdrawn 24/07/2023.
- 5.15 230905 - Discharge of condition 15 (habitat enhancement scheme) of planning permission 210902, as granted on 10/11/2022. Condition discharged 23/08/2023.
- 5.16 231062 - Application for approval of details reserved by condition 7 (Noise assessment) of application 210902. Condition discharged 29/08/2023.
- 5.17 231801/VARIAT - Variation of condition 2 (approved plans) of planning permission 210902 (granted on 10/11/2022 for construction of new residential floor above existing roof level to create new residential use Class C3 to comprise 8 residential units) to alter windows and doors on all floors and elevations, provide brick banding detailing below the new floor, removal of the permitted roof terrace, provision of 9 air source heat pumps and 2 opening vents at roof level, revised escape staircase, amendments to the height of the building and various other associated works. Granted 23/05/2024. Referenced above as 'part 3'.
- 5.18 231792/VARIAT- Variation of condition 2 (approved plans) of planning permission 210885 (granted on 24/08/2021 for roof alterations and external elevation works) to alter windows and doors on all floors and elevations, provide brick banding detailing at the newly created floor level, increase in width of the addition on the northern elevation, amendments to the height of the building and associated works. Granted 04/06/2024. Referenced above as 'part 2'.
- 5.19 PL/24/0375 - Discharge of condition 8 (Air Quality Assessment) of planning permission 210902, as granted on 10/11/2022. Condition discharged 11/04/2024.
- 5.20 PL/24/0791/VARIAT - Variation of condition 1 (Use not to commence until roof and elevation works associated with Ref: 210885 have been completed) of prior approval Ref: 210906 (as allowed on appeal on 22/11/2022 for Change of use from office use Class B1a to residential use Class C3 to create 13 new

residential dwellings) to amend the wording to reflect that updated plans have since been approved to Ref: 210885 by Ref: 231792. Granted 27/08/2024.

5.21 PL/24/1284 - External works to basement floor to create new window openings. Refused 28/11/2024.

5.22 PL/24/1285 - Change of use of Basement level from Class E (offices) to C3 (dwelling houses) to comprise 6 residential units and cycle parking - Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015. Refused 28/11/2024 for the following reasons:

1. In the opinion of the Local Planning Authority and on the basis of the plans and supporting material submitted, the proposed development would provide insufficient natural light to many of habitable rooms of the six C3 flats proposed to be provided. The developer has provided insufficient information on how the light report was modelled particularly due to the existence of internal pillars, supports, ducts and structural features that obstruct the flow of light into the units along Rupert Street and Kings Road, vegetation to the front of the site could also provide additional shading and the location of the rear entrance in front of the bedroom to unit 6 and the light report appears to have been undertaken on the basis that such internal obstructions are absent, there are no internal walls in the flats and much larger window openings than are shown in the related full planning application ref PL24/1284 to enable the authority to establish whether the proposed development complies with MA.2(1) (2) (f) . The development would therefore give rise to unacceptable harm to the living conditions of future occupiers. Prior approval is refused on the basis that the development does not secure the provision of adequate natural light in all habitable rooms of the dwellinghouses contrary to the requirements of paragraph MA.2(1) (2) (f) of Schedule 2, Part 3 of the GPDO.
2. The plans provided in relation to the planning application ref. PL24/1284, to provide additional windows for application PL24/1285, are inconsistent and the elevations proposed do not align with the proposed floor plan 2023-258-003 or basement window images, particularly in relation to the frontage on King Street on elevation A plan 2023-258-005 and do not accurately reflect proposed windows facing into the car parking area on elevation D plan 2023-258-006. As such the proposal is contrary to paragraph W of Schedule 2, Part 3 of the GPDO, policy CC7 Design and the Public Realm of the Reading Borough Local Plan (2019) and para 140 of the NPPF 2023.

5.23 PL/24/1518 - Discharge of conditions 9 (refuse and recycling bin stores, including pest and vermin control measures), 10 (cycle parking), 11 (postal addresses), 13 (electric vehicle charging scheme), 17 (privacy screens) and 18 (accessible and adaptable measures) of permission 231801, as granted on 23/05/2024. Conditions discharged 06/03/2025.

- 5.24 PL/25/0983 - External works at basement floor level to create new window openings on the east and west elevations, and rooflights on the south and west elevations. The application was submitted on 10/07/2025. The application was made invalid by the Local Planning Authority on 16/07/2025 and information remains outstanding at the time of writing to enable the validation of the application. It therefore remains invalid at the time of writing.
- 5.25 PL/25/0994 - Discharge of condition 6 (As Built Standard Assessment Procedure details) of permission PL/23/1801, as granted on 23/05/2024. Condition discharged 26/08/2025.

6. Consultations

- 6.1 RBC Transport – The site is located to the north of Kings Road (A329), a major transport corridor into Reading. The site is accessed to the east of Rupert Street, which forms a left-in/left-out vehicle crossover with Kings Road (A329). The A329 Kings Road is a major bus route with bus stops located on both sides of the carriageway and dedicated bus lanes allowing for bus priority in both eastbound and westbound directions. The site is located in Zone 2, the Primary Core Area within the Revised Parking Standards and Design SPD. This zone directly surrounds the Central Core Area and extends to walking distances of 2 kilometres from the centre of Reading. The application proposes to create 5 x1 bedroom units and 1 x 2 bedroom unit. In accordance with the Council's Revised Parking Standards and Design SPD, the development would be required to provide 1 parking space per 1 and 2 bedroom unit.
- 6.2 The proposal will result in the loss of existing parking spaces located at basement level. The loss of the parking spaces can be accepted given the extensive parking restrictions in place preventing unauthorised parking and any overspill of parking. The Council's Residential Permit Parking Scheme operates in this area. Therefore, under the Borough's current parking standards, the proposal would generate additional pressure for parking in the area. If this application is approved there should be an assumption that any future occupants of the proposed dwellings will not be issued with resident or visitor parking permits. An informative should be stated on any future decision notice to specify this. This will ensure that 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.
- 6.3 In line with the Council's adopted Parking Standards and Design SPD, each of the 1 and 2 bedroom unit should be provided with 0.5 secure cycle parking, however under prior approval applications we would not comment on this (Planning officer comment: nevertheless, cycle parking is shown to be proposed at basement floor level, meaning suitable provision is proposed for the 6 residential units sought as part of this application).
- 6.4 Bin storage should comply with Manual for Streets and British Standard 5906: 2005 for Waste Management in Buildings and should be located no further than 10m from the access point of the site to avoid the stationing of service vehicles

on the carriageway for excessive periods. It is recommended that the Councils Waste Management team be contacted to ensure the correct capacity of bins is provided.

- 6.5 There are no Transport objections to this permitted development application, with informatives recommended to be added to any positive decision notice in respect of future highways works and future residents be unlikely to be granted future on-street parking permits.
- 6.6 RBC Environmental Protection advised that they had no comments on the application.
- 6.7 RBC Waste Services – If the applicant is proceeding with a trade waste collector as stated under the PL/24/1518 approved details, then no further comments to add (Planning Officer statement: the waste collection method is not referenced in the submission by the applicant).

7. Publicity

- 7.1 Three site notices were displayed at the application site on 17/07/2025 (expiring on 07/08/2025), on Kings Road, Rupert Street and Norwood Road (see photographs below). No comments have been received.



8. Appraisal

- 8.1 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) and MA.2 (2) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).
- 8.2 In addition, in order 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 the nationally described space standard.

8.3 More specifically, in Article 3 of the GPDO the following is stated:

(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.

(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.

8.4 With this in mind, the technical requirements within the Technical housing standards – nationally described space standard, are stated below in bold, with comments provided thereafter:

a. the dwelling provides at least the gross internal floor area and built-in storage area set out in Table 1 below - This is specified separately below in paragraphs 8.5-8.16, but in short, the proposals do not comply.

b. a dwelling with two or more bedspaces has at least one double (or twin) bedroom – Complies, albeit given the floor to ceiling heights internally are not stated in the submission, it is unclear whether the double bedrooms are sufficiently sized (see d, e, f below).

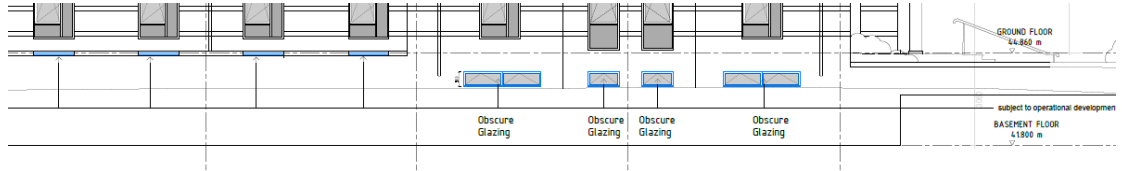
c. in order to provide one bedspace, a single bedroom has a floor area of at least 7.5m² and is at least 2.15m wide – not applicable, given 2 and 4 bedspace units are proposed

d. in order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5m² – would have complied had headroom information been provided, as per f) below, but it has not, so this is unproven.

e. one double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide – would have complied had headroom information been provided, as per f) below, but it has not, so this is unproven.

f. any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1m² within the Gross Internal Area) – unknown - not demonstrated as no section plans provided, so the applicant has failed to demonstrate this. More specifically, whilst the elevation plans do indicate floor levels (example below), it is unknown whether this actually represents the headroom within the units themselves.

Based on the officer site visit to the existing basement on 05/08/2025, there are a series of pipeworks at basement level, which would be likely to restrict floor to ceiling heights in practice (see photographs below) with suspended ceilings and raised floors likely to be required to accommodate existing arrangements, on the assumption that these are not going to be completely altered. Accordingly, there has been a failure to demonstrate this element of the proposed development by the applicant.



Above: Looking east in the area of Flats 4, 5 & 6



Above and below: Looking south in the area of Flat 3





Above and below: Looking west in the area of Flats 1 & 2.



g. any other area that is used solely for storage and has a headroom of 900-1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all – unknown - not demonstrated as no section plans provided, so the applicant has failed to demonstrate this.

h. a built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72m² in a double bedroom and 0.36m² in a single bedroom counts towards the built-in storage requirement – no built-in wardrobes shown on the plan submitted, so not counted.

i. the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area – unknown - not demonstrated as no section plans have been provided, with concerns raised as per section f. above. As such, the applicant has failed to demonstrate this.

8.5 More specific information in respect of technical requirement a: Flat Size information provided by the applicant:

3.2 The mix of proposed residential dwellings is as follows:

Flat 1: 47.1sqm 1b 2p
Flat 2: 45.8sqm 1b 2p
Flat 3: 44.8sqm 1b 2p
Flat 4: 37.6sqm 1b 2p
Flat 5: 37.3sqm 1b 2p
Flat 6: 70.25sqm 2b 4p

8.6 Annotations on the proposed basement plan:

FLAT 1	FLAT 2	FLAT 3	FLAT 4	FLAT 5	FLAT 6
47.1 sqm	45.8 sqm	44.8 sqm	37.6 sqm	37.3 sqm	70.25 sqm
1b 2p	1b 2p	1b 2p	1b 2p	1b 2p	2b 4p

8.7 Relevant extracts of Table 1 within the Technical housing standards:

Table 1 - Minimum gross internal floor areas and storage (m²)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		

*** Notes (added 19 May 2016):**

1. Built-in storage areas are included within the overall GIAs and include an allowance of 0.5m² for fixed services or equipment such as a hot water cylinder, boiler or heat exchanger.

2. GIAs for one storey dwellings include enough space for one bathroom and one additional WC (or shower room) in dwellings with 5 or more bedspaces. GIAs for two and three storey dwellings include enough space for one bathroom and one additional WC (or shower room). Additional sanitary facilities may be included without increasing the GIA provided that all aspects of the space standard have been met.

3. Where a 1b1p has a shower room instead of a bathroom, the floor area may be reduced from 39m² to 37m², as shown bracketed.

4. Furnished layouts are not required to demonstrate compliance.

8.8 Officer assessment: Flats 1, 2, 3, 4 and 5 are specified by the applicant to be 1 bedroom 2 person (1b 2p) units. In each instance, based on the gross internal floor area information stated by the applicant, within both the planning statement and on the submitted plan, these are all below the minimum gross internal floor area of 50sqm. These units, by virtue of the information submitted by the applicant, do not comply with the nationally described space standard.

8.9 Officers have separately undertaken measurements of the flats, based on the plans provided. Please note that no scale bar is shown on the plan, so measurements are based on the window & corridor width figures stated on the plan by the applicant. Officer calculations are shown below:

Flat Number & required standard	Methodology (all in metres)	Floorspace total (all in sqm)	Complies with national standards?
1 (1b 2p = 50sqm)	9 x 5.05	45.45	No
2 (1b 2p = 50sqm)	9.15 x 5.05	46.2	No
3 (1b 2p = 50sqm)	1.5 x 3.8 + 7.5 x 5.2	44.7	No
4 (1b 2p = 50sqm)	4.6 x 8.1	36.85	No

5 (1b 2p = 50sqm)	4.55 x 8.1	37.26	No
6 (2b 4p – 70sqm)	8.6 x 8.1	69.66	No

8.10 The officer assessment of the floor areas demonstrates that none of the 6 residential units comply with the nationally described space standard in terms of the minimum gross internal floor areas, with Flat 6 (2b 4p) unit also below the minimum 70sqm, at 69.66sqm.

8.11 Officers also note that even if the applicant were to suggest that the 1b 2p units were actually 1 bedroom 1 person units, then Flats 4 and 5 would still be below the 39sqm requirement, as per calculations by the applicant and officers. The internal layouts of Flats 4 and 5 show a bathroom, not a shower room, meaning 39sqm is the required standard, not 37sqm.

8.12 Hence, in terms of the nationally described space standard for the minimum gross internal floor areas, the proposals do not comply.

8.13 In terms of storage space within each unit, no information has been provided by the applicant. Although no annotations specify storage spaces on the submitted plans, the small separate rooms within each unit have been assumed to be storage spaces by officers. Officers have separately undertaken measurements of the storage spaces as follows:

Flat Number & the required standard	Methodology (all in metres)	Floorspace total (all in sqm)	Complies with national standards?
1 (1b 2p = 1.5sqm)	1.05 x 0.9	0.95	No
2 (1b 2p = 1.5sqm)	1.05 x 0.9	0.95	No
3 (1b 2p = 1.5sqm)	1.55 x 0.7	1.085	No
4 (1b 2p = 1.5sqm)	0.8 x 1.2	0.96	No
5 (1b 2p = 1.5sqm)	0.8 x 1.2	0.96	No
6 (2b 4p = 2sqm)	1.2 x 0.65 + 1.2 x 0.8	1.74	No

8.14 The officer assessment of the floor areas demonstrates that none of the 6 residential units comply with the nationally described space standard in terms of the minimum storage areas.

8.15 Officers also note that even if the applicant were to suggest that the 1b 2p units were actually 1 bedroom 1 person units, then Flats 1, 2, 4 and 5 would still be below the lesser 1sqm requirement, as per calculations by officers. Hence, in terms of the nationally described space standard for the minimum storage areas, the proposals do not comply.

8.16 Therefore, in overall terms, the proposals do not accord with the requirements of Section 9A (b) of Article 3 of the GPDO (as amended). This forms a standalone reason for refusal of the application.

- 8.17 Irrespective of the above, each of the criteria is also considered below too:
- 8.18 Criteria MA.1.—(1)
- 8.19 **Part (a) (three month vacancy)** was removed from the legislation on 5th March 2024 (as per the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2024) and is therefore not relevant.
- 8.20 **(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;*”**
- 8.21 Complies. The planning statement specifies an office (Class E) (formerly Class B1, prior to changes to the Use Classes Order in 2020) use at basement floor level:
- 2.3 The basement area of the building is a full height enclosed space which contains parking and plant equipment associated with the office (Class E) lawful use of the building and is regularly entered by users of the building.

The building has been in use class B1 (Business) since constructed in 1991.

- 8.22 Whilst the planning history of the site (see section 5 above) indicates a series of applications for change of use from office to residential, based on the officer site visit on 05/08/2025 (after the submission of this application) none of the residential units had been completed or were occupied at that time, with the basement being used for parking, staff welfare areas and storage associated with the on-going works at the site. Set within this context, the basement floor retains a Class E use at this time and based on this historic use the proposals comply at this point in time.
- 8.23 **(c) (Floorspace qualification)** was removed from the legislation on 5th March 2024 (as per the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2024) and is therefore not relevant.
- 8.24 **(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;”***
- 8.25 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.
- 8.26 **(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;”**

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

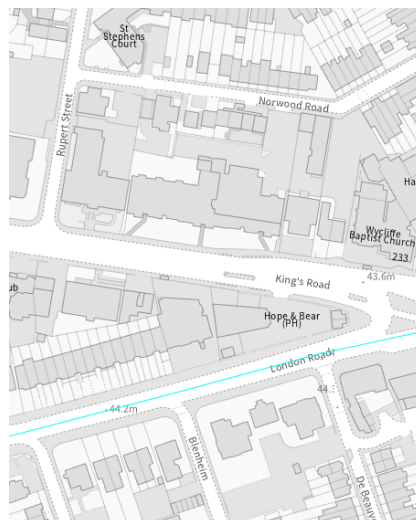
8.28 **(f) Agricultural tenancy criteria – “If the site is occupied under an agricultural tenancy, unless the express consent of both the landlord and the tenant has been obtained;”**

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

8.30 **(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.**

8.31 Complies – not applicable and, in any event, the site is outside the article 4 area within Reading Borough (London Road to the south is the boundary of an article 4 area), as shown below.



8.32 Conditions

8.33 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—

(2)

- (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.

8.33 Assessment of MA.2.—(2)

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

8.35 The Council's Transport Team, as per the comments at section 6 above, are content with the proposals, subject to informatives about a) highways works and b) which effectively advises future occupiers that they will not be automatically entitled to an on-street car parking permit.

8.36 **(b) Contamination risks in relation to the building**

8.37 The applicant has not submitted a land contamination study, specifying that the potential for site contamination to be low given the town centre location and existing built form. RBC Environmental Protection Officers, as per the comments at section 6 above, raise no issues in this regard. The proposals are considered to be acceptable in this respect.

- 8.38 **(c) Flooding risks in relation to the building**
- 8.39 The site is wholly within Flood Zone 1. A Flood Risk Assessment has not been submitted, with it agreed in this instance that no FRA is required owing to the low flood risk status of the site.
- 8.40 **(d) Impacts of noise from commercial premises on the intended occupiers of the development**
- 8.41 RBC Environmental Protection Officers raise no issues with the proposals, with the immediate neighbouring buildings being in residential use.
- 8.42 **(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;**
- 8.44 The building is not located within a Conservation Area.
- 8.45 **(f) the provision of adequate natural light in all habitable rooms of the dwellinghouses**
- 8.46 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, corridors, laundry rooms and hallways.
- 8.47 As a starting point, where the application relates to prior approval as to adequate natural light, the LPA must refuse prior approval if adequate natural light is not provided in all the habitable rooms of the dwellinghouses. This is not a matter for the LPA's discretion, as refusal is mandatory in such circumstances. The LPA's discretion under paragraph W(3) to refuse an application where the proposed development does not comply with any of the relevant conditions, limitations or restrictions applicable to the development permitted is removed in respect to the provision of adequate light in the case of Class MA, in view of the absolute requirement to refuse the application where adequate natural light is not provided in such a case.
- 8.48 The procedure for applications for prior approval under Part 3 - W clarifies as follows:
- (2A) Where the application relates to prior approval as to adequate natural light, the local planning authority must refuse prior approval if adequate natural light is not provided in all the habitable rooms of the dwelling houses.*

(3) The local planning authority may refuse an application where, in the opinion of the authority—

(a) the proposed development does not comply with, or

(b) the developer has provided insufficient information to enable the authority to establish whether the proposed development complies with, any conditions, except for conditions in paragraph G.1(d)(iv), paragraph M.2(1)(f), paragraph MA.2(1)(f), paragraph N.2(1)(e), paragraph O.2(1)(e), paragraph PA.2(1)(v), or paragraph Q.2(1)(g), limitations or restrictions specified in this Part as being applicable to the development in question.

<https://www.legislation.gov.uk/uksi/2015/596/schedule/2/part/3>

8.49 The applicant is mindful of a previous prior approval application being refused at the site (see paragraph 5.22 above for details) and has submitted an Internal Daylight and Sunlight Report, together with commentary within the Planning Statement, to seek to address the previous concerns raised.

8.50 However, a series of concerns continue to be raised with the information submitted. This means that the local planning authority considers that the developer has provided insufficient information to enable the authority to establish whether the proposed development complies with the requirement to provide adequate natural light in all habitable rooms of the dwellinghouses. More specifically, the following concerns are raised:

- Unclear whether the plans the Internal Daylight and Sunlight Report are based on are the same plans as those submitted with this application:

8.51 Section 2 of the Internal Daylight and Sunlight Report states the report is based on a series of plans, as referenced below left (all starting -2022) and stated to have been received on 07/07/2025. These drawings reference numbers, which are not included in the report itself, contrast with the plans submitted with this application (see section 3 above and reproduced below right), which all begin -2023. It is therefore unclear whether the report is based on the same plans as submitted as part of this application.

2 Sources of Information

2.1 In the process of compiling this report, the following sources of information have been used:

Archi-Tekt

- Proposed Scheme Information (received 7.7.25)

- 2022-258-001
- 2022-258-002
- 2022-258-003
- 2022-258-005
- 2022-258-006
- 2022-258-007
- 2022-258-008
- 2022-258-100
- 2022-258-101
- 2022-258-102
- 2022-258-103
- 2022-258-104

Zmapping Ltd

- 3D Zmapping Model

- 2023-258-002 – Location Plan (Actually the Proposed Site Block Plan)
- 2023-258-003 - Existing & Proposed Basement
- 2023-258-005 - Proposed Elevation A & B
- 2023-258-006 - Proposed Elevation C & D
- 2023-258-008 - Proposed Elevation C & D (Actually the pre-existing elevations with the "subject to operational development" additions)
As all received on 10/07/2025

- Unclear whether the Appendix 1 and 2 information within the Internal Daylight and Sunlight Report is consistent with the plans referenced at section 2 of the same report and those submitted with this application

8.52 Appendix 1 includes a series of 3D views and Appendix 2 a CBDM Assessment, with all those plans being dated June 2025 and the source of information being plans being referenced as being received on 03/06/2025. This is inconsistent with the information provided at section 2 of the report, which states the source of information is plans received on 07/07/2025. It is therefore unclear whether the information within the report itself is consistent and based on the same information, if the sources of information differ at different parts of the report.

Sources:

Proposed Info (received 03/06/2025)
2022-258-BASEMENT P A C of U.dwg

- *Inconsistency in the extent of openings within the Internal Daylight and Sunlight Report and with the submitted plans*

8.53 Image 2 at page 11 of the Internal Daylight and Sunlight Report (extract below) indicates some form of opening on the Rupert Street façade of the building, in line with the separate rooflights, to serve proposed Flats 1 & 2. However, this does not correspond with the equivalent 3D view at Appendix 2 of the report (extract below), or the elevation/floor plan submitted with the application, where no openings are shown at these points, only rooflights. This calls into question whether the assessment has been based on more window openings than are actually proposed in a separate 'operational development' application.

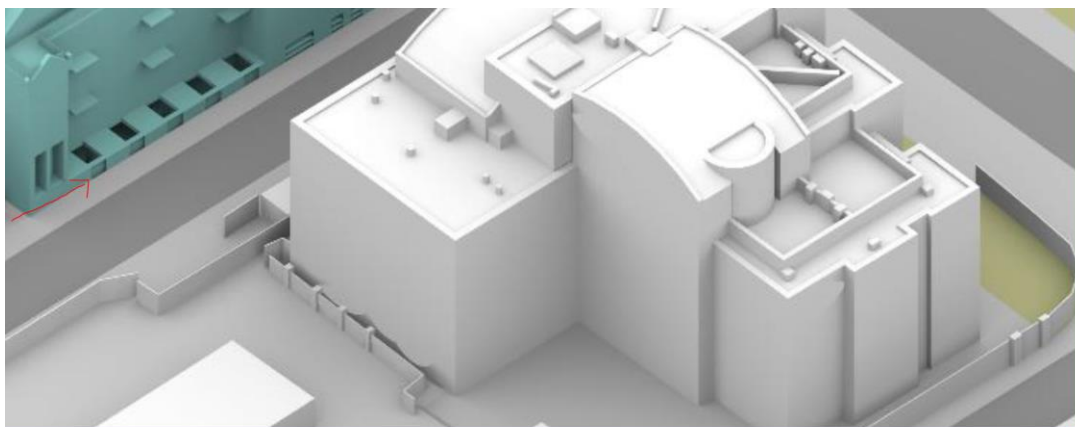
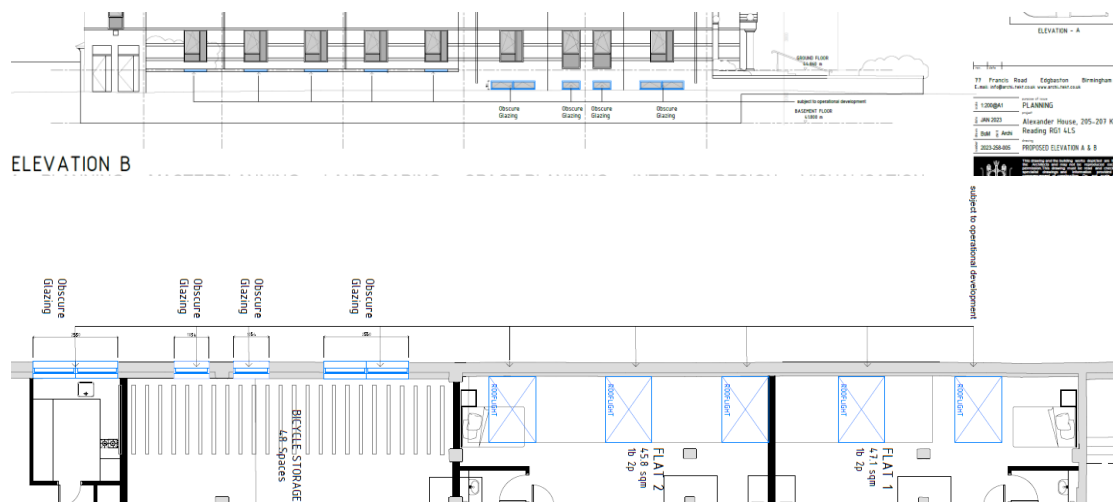


Image 2

Extract of Image 2 at page 11 of the Internal Daylight and Sunlight Report – marked up with a red arrow to show the five openings on the Rupert Street façade



Extract of page 19 of the Internal Daylight and Sunlight Report, with the proposed 3D view in Appendix 2 not showing any openings on the façade, unlike page 11



Extracts of floor plan and elevation plans submitted, which do not show any openings on the façade, only rooflights, serving proposed flats 1 & 2.

- *Unclear, based on the information provided, whether the assessment takes into account all existing services in the basement – e.g. unclear if the pipes in front of proposed flats 4-6 are taken into account – and what impact these would have on the light levels within the rooms.*

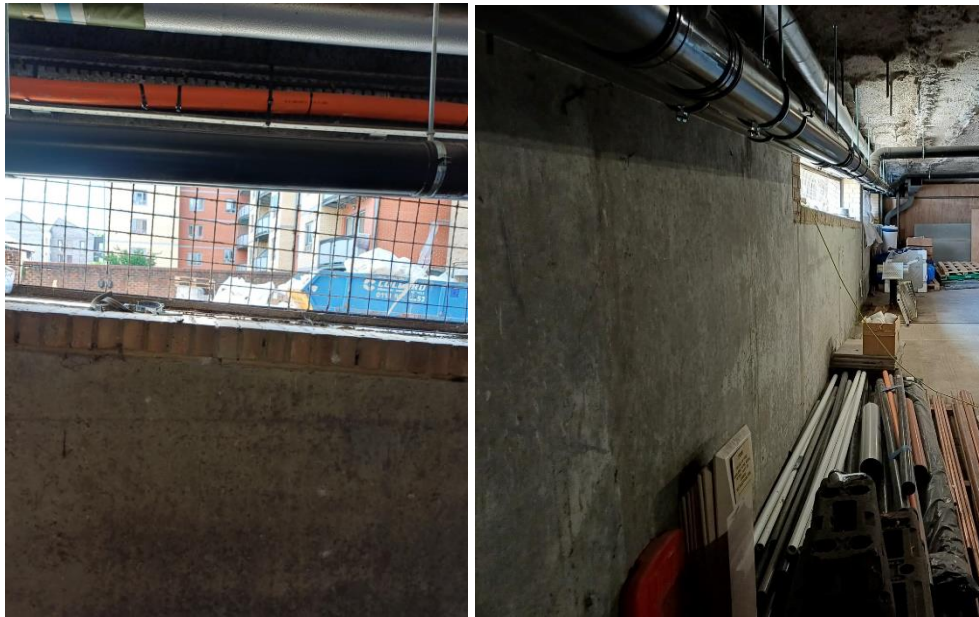
8.54 Whilst it is acknowledged that the Planning Statement quotes paragraph 7.4 of the Internal Daylight and Sunlight Report states all structural features of the building are taken into account, it is unclear why image 4 (shown below) only shows pillars and internal walls and not all elements as witnessed during the officer site visit on 05/08/25, such as the existing pipework directly in front of

the existing openings serving proposed Flats 4-6, as shown in the photographs below.

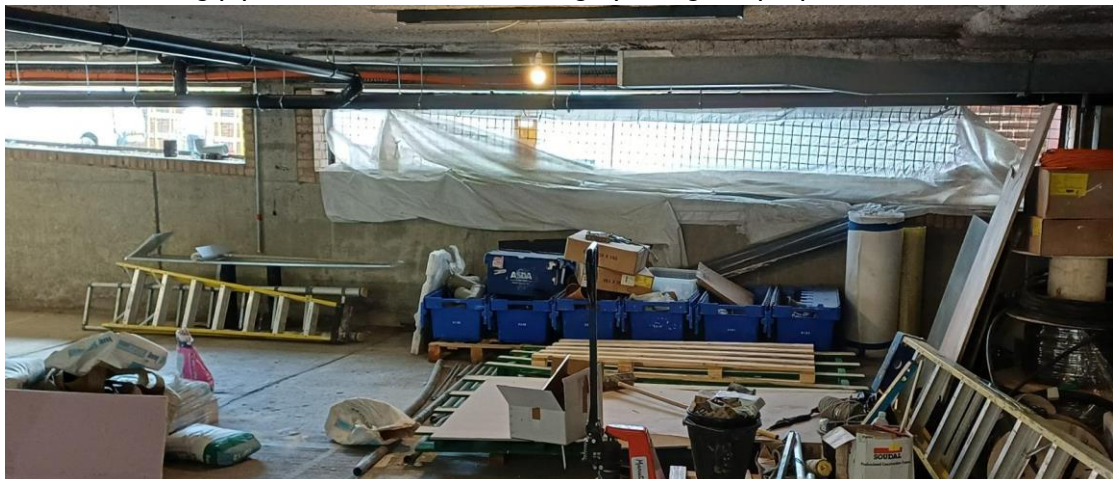
7.4 We can confirm that our model captures all the structural features of the building, including internal pillars, supports, ducts, internal walls, etc. and the rear entrance in front of unit six (which can be seen in image 3 above). We have included some images in Appendix 1 taken from our model which show the internal rooms in the building including the pillars and internal walls. The pillars and walls can also be seen on the 2D plots in Appendix 2; please see the annotated image 4 below.



Image 4



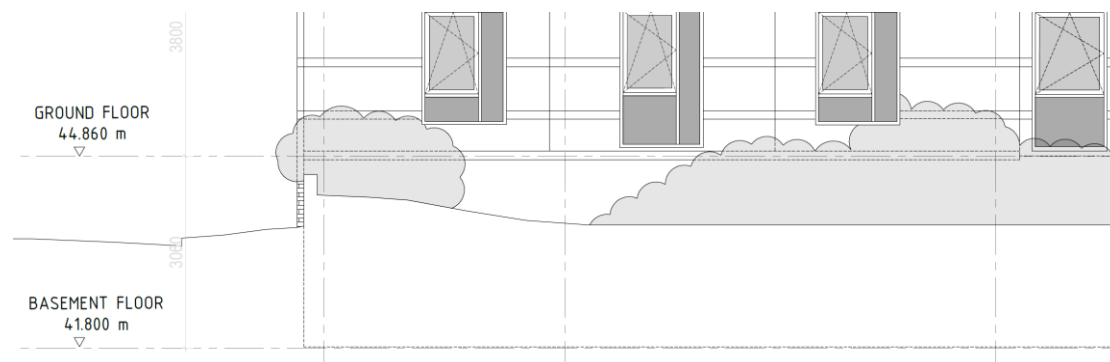
Photos showing pipeworks in front of existing openings of proposed Flats 4-6.



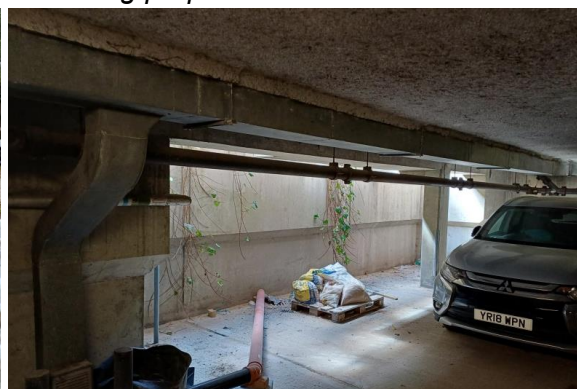
8.55 The developer has provided insufficient information to enable the authority to establish whether the proposed development complies with the standards. It is still questioned whether the methodology is robust in terms of taking into account obstructions. For example, if these pipes were to remain or be boxed in, this would limit the floor to ceiling height of the unit, which may in turn limit the light levels within the flats, noting the length of these windows are 1.4m.

- *Unclear methodology regarding the position of the glazing for Flat 3*

8.56 There is no indication on the plans submitted where the rooflights serving proposed Flat 3 are positioned. No information is stated on the elevation plan (extract below) and no section plan has been provided. The lightwell includes a raised surround, meaning that if the glazing were positioned away from the flush point, given the significant depth and small size of the lightwell, the surround could impact on the amount of light received within the subsequent room. Accordingly, the methodology followed by the applicant is unclear, meaning the developer has provided insufficient information to enable the authority to establish whether the proposed development complies with the standards.



Elevation A - no indication of the rooflights serving proposed Flat 3

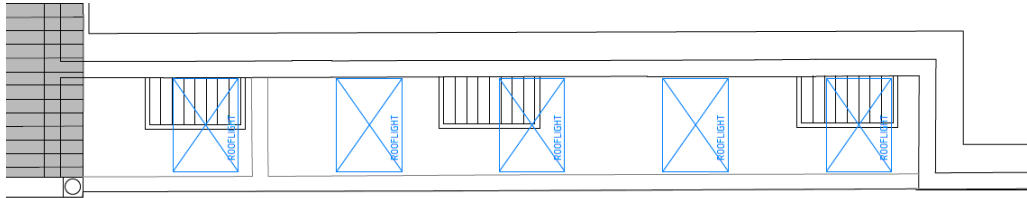


Photos showing the raised surround of the lightwell (left) & basement level (right).

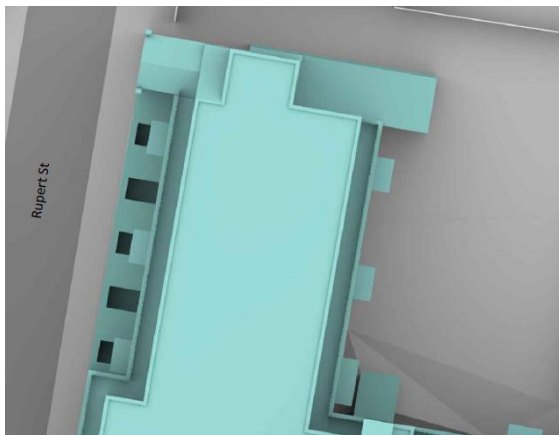
- *Inconsistency between the report and plans regarding the position of balconies on Rupert Street*

8.57 The block plan submitted with the application shows the existing balconies in the context of the separately proposed rooflights, which would serve Flats 1

and 2. However, these do not align with the positions shown at Appendix 1 of the Internal Daylight and Sunlight Report (page 17). The position of the balconies is likely to impact on the amount of light reaching these rooms, so it is unclear whether the report is based on accurate information. Again, this means the methodology followed by the applicant is unclear, meaning the developer has provided insufficient information to enable the authority to establish whether the proposed development complies with the standards.



Extract of 2023-258-002 Block Plan, showing the balconies & intended rooflights.



Extract of Appendix 1 Proposed 3D View p3796/01 Rev 06, where the location of the rooflights does not align with those shown on the block plan above.



Photos of the existing context along Rupert Street (05/08/2025)

- 8.58 Appendix 2 of the Internal Daylight and Sunlight Report (page 23) illustrates the illuminance levels (through a CBDM Assessment) of the relevant rooms. However, whilst the plan shows the results for the whole rooms (barring the areas closer than 0.3m to the walls) in Flats 1, 2 and 3, parts of the relevant rooms for 4, 5 and 6 are excluded, with these spaces instead being shown by a block outline / white space (meaning they have not been included in the assessment grid for the rooms).
- 8.59 No explanation is provided as to why this differing approach has been taken, with it evident that the light levels in the spaces not shown to be calculated likely to receive the lowest levels of light, owing to being furthest away from the proposed windows. It is acknowledged, mindful of Figure C3 within Appendix C of the BRE guidance (2022), that the applicant may suggest that the irregular shape of the rooms means the areas not included are justified on that basis. However, this is not agreed, with the BRE guidance stating the space *“need not be included in the assessment grid area (unless it is wide enough to be part of the usable space in a room, typically over 1.5m wide)”*. In all instances the space in the room is over 1.5m wide, meaning officers consider that an increased assessment grid should have been used by the applicant for Flats 4, 5 and 6. It is unclear why the applicant has included an area less than 1.5m wide in Flat 3 (the furthest west space), but excluded areas wider than 1.5m in Flats 4, 5 and 6. This would indicate an inconsistency of approach.
- 8.60 Again, this means the methodology followed by the applicant is unclear, meaning the developer has provided insufficient information to enable the authority to establish whether the proposed development complies with the standards.



- *Unclear why a maintenance factor of 0.92 and framing factor of 0.8 has been applied – impacts on the validity of the results.*
- 8.61 Section 6 of the Internal Daylight and Sunlight Report (page 10) states that a maintenance factor of 0.92 and framing factor of 0.8 has been applied, without providing any explanation in either instance.
- 8.62 In terms of maintenance factors, the applicant has applied the factor which equates to vertical, no overhang windows in an urban area (0.92 – as per Table C6 within the BRE guidance). Given that the proposals include a series of horizontal rooflights, which have a lower maintenance figure of 0.76, it is unclear why this has not been referenced in the assumptions section of the report submitted, with this potentially impacting on the validity of the results provided.
- 8.63 In terms of framing factors, Table C5 in the BRE guidance includes recommended default framing factors, all of which are lower than the 0.8 applied (0.5 for windows with small panes, 0.6 for normal windows with opening lights and 0.7 for patio doors), so set within this context it is unclear why a higher framing factor has been applied. Furthermore, the guidance notes that framing factors will generally vary with window size – given a range of window sizes are proposed then different framing factors could have been expected for different windows. Again, these assumptions, which have not been adequately evidenced, could impact the validity of the results.
- 8.64 This is another instance of where the methodology followed by the applicant is unclear, meaning the developer has provided insufficient information to enable the authority to establish whether the proposed development complies with the standards.
 - Non-default interior wall and ceiling reflectances are used without the specification of materials being stated
- 8.65 Section 6 of the Internal Daylight and Sunlight Report (page 10) states that an internal surface reflectance value of 0.8 for ceilings and 0.7 for walls has been applied. The BRE guidance includes recommended default reflectances at Table C4 (see below), with paragraph C24 stating that “surface reflectances used should be presented in the assessment, along with a specification of the materials if non-default reflectances are used”. The applicant is proposing non-default interior wall (0.7, above the default 0.5) and ceiling (0.8, above the default 0.7) reflectances, without the specification of materials being stated, contrary to the guidance. It is noted that the applicant quotes a section of paragraph C24, but excludes reference to this part of the guidance.

C23 Surface reflectances should represent real conditions. Where reflectance values have not been measured or specified, default values to be used in the calculation are given in Table C4.

Table C4 – Recommended default surface reflectances	
Surface	Default reflectance
Interior walls	0.5
Ceilings	0.7
Floors	0.2
Exterior walls and obstructions	0.2
Exterior ground	0.2

C24 Where surface finishes have been specified or measured on site, they can be used in the calculations with appropriate factors for maintenance and furniture. To allow for these factors, maximum reflectances for white painted surfaces in the calculations should not exceed 0.8 indoors, and 0.6 outdoors. Maximum reflectances for light pastel walls should not exceed 0.7 in the calculations, and maximum reflectances for light wood floors should not exceed 0.4. Surface reflectances used should be presented in the assessment, along with a specification of the materials if non-default reflectances are used.

- 8.66 This is consequently another instance of where the methodology followed by the applicant is unclear, meaning the developer has provided insufficient information to enable the authority to establish whether the proposed development complies with the standards.
- 8.67 In overall terms, given the numerous concerns with the methodology used by the applicant, this calls into question the validity of the results present, which in daylight terms are presented to be only marginally above the BRE minimum standards. Given these concerns, together with the basement location of the units, the lack of any conventional vertical windows serving Flats 1, 2 and 3 (which would only be served by rooflights) and limited extent of windows serving Flats 4 – 6 (with Flat 6 constrained by a closely located entrance to the building), officers simply consider that the developer has provided insufficient information to enable the authority to establish whether the proposed development complies with the requirement to provide adequate natural light in all habitable rooms of the dwellinghouses.
- 8.68 Paragraph 135 f) of the NPPF (2024) requires Local Planning Authorities to create places that promote health and well-being, with a high standard of amenity for future users. Policy CC8 of the Reading Borough Local Plan requires new development not to cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties in terms of access to sunlight and daylight. In this instance the applicant has provided insufficient information to enable the authority to establish whether the proposed development complies with the requirement to provide adequate natural light in all habitable rooms of the dwellinghouses. By consequence, in the absence of information to the contrary, the proposals would give rise to unacceptable harm on the living conditions of future occupiers, failing to demonstrate adequate natural light in all habitable rooms of the dwelling houses, contrary to the requirements of paragraph MA.2 (2) (f) of Schedule 2, Part 3 of the GPDO (as amended). This forms a standalone reason for refusal of the 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

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 does 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 building does not meet these criteria and therefore a Fire Statement is not required.

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

The application was received on 12 November 2024, so complies

(4) The provisions of paragraph W (prior approval) of this Part apply in relation to an application under this paragraph as if –

(a) for paragraph (e) of sub-paragraph (2) there were substituted—

“(e) where—

(i) sub-paragraph (6) requires the Environment Agency to be consulted, a site-specific flood risk assessment;

(ii) sub-paragraph (6A) requires the Health and Safety Executive to be consulted, a statement about the fire safety design principles, concepts and standards that have been applied to the development,”;

(b) 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”;

(c) after sub-paragraph (6) there were inserted—

“(6A)Where the application relates to prior approval as to fire safety impacts, on receipt of the application, the local planning authority must consult the Health and Safety Executive.”

Relevant elements complied with by the LPA.

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

Would have been secured via condition had approval been recommended.

(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.]

Would have been secured via condition had approval been recommended.

Recommendation:

Concerns – several of the units don’t meet the national space standards

Unclear whether floor to ceiling height is sufficient, as no section plans provided – this is called into question owing to the wide array of pipework witnessed at basement floor level during the officer site visit.

Series of concerns with the day/sun report, means that the applicant has failed to demonstrate that the units will receive adequate light.

Prior Approval is **REQUIRED** and **REFUSED**, for the following reasons:

1. The proposals do not comply with the nationally described space standard issued by the Department for Communities and Local Government on 27th March 2015, contrary to the requirements of Section 9A (b) of Article 3 of the of the Town and Country Planning (General Permitted Development Order) (England) Order 2015 (as amended).
2. The developer has provided insufficient information to enable the Local Planning Authority to establish whether the proposed development complies with the requirement to provide adequate natural light in all habitable rooms of the dwellinghouses. Therefore, in the absence of sufficient information, the proposal gives rise to unacceptable harm on the living conditions of future occupiers, contrary to the requirements of paragraph MA.2 (2) (f) of Schedule

2, Part 3 of the Town and Country Planning (General Permitted Development Order) (England) Order 2015 (as amended).

Informatives:

1. The following information has been taken into account in determining this application:
 - Completed application form (Portal Ref PP-14160772), dated 08/07/2025
 - Completed CIL form - Community Infrastructure Levy (CIL) - Form 1: CIL Additional Information, dated 08/07/2024
 - Planning Statement 'Alexander House Prior Approval Basement Planning Statement' by HCH Projects, undated
 - 205-207 King's Road, Reading Internal Daylight and Sunlight Report by Point 2 Surveyors Limited, Ref 3796 Version V2, dated 08/07/2025
 - AHR_PA1 001 Rev 0 – Existing Location Plan
 - 2023-258-002 – Location Plan (Actually the Proposed Site Block Plan)
 - 2023-258-003 - Existing & Proposed Basement
 - 2023-258-005 - Proposed Elevation A & B
 - 2023-258-006 - Proposed Elevation C & D
 - 2023-258-008 - Proposed Elevation C & D (Actually the pre-existing elevations with the "subject to operational development" additions)

As all received on 10/07/2025
2. Whilst a separate application for the 'operational development' referenced in the documentation specified in informative 1 has been received by the Local Planning Authority (Reference PL/25/0983), no such application is presently under consideration or has been separately approved by the Local Planning Authority. Application PL/25/0983 was made invalid by the Local Planning Authority on 16/07/2025 and information remains outstanding at the time of writing to enable the validation of the application.