

3 February 2026

The Savills logo, featuring the word "savills" in a red, lowercase, sans-serif font, positioned within a yellow rectangular background.

Reading Borough Council
Planning,
Reading Borough Council Civic Offices,
Bridge Street,
Reading,
RG1 2LU

Tom Noble
E: thomas.noble@savills.com
DL: +44 (0) 20 7499 8644
Mobile: +44 (0) 7779 402752

33 Margaret Street W1G 0JD
T: +44 (0) 20 7499 8644
savills.com

Dear Sir or Madam,

Eaton Court, 104-112 Oxford Road, Reading, RG1 7NG
Change of Use from Commercial to Residential via Permitted Development Rights
Planning Portal Reference: PP-14673805

On behalf of our client, Eaton Reading Ltd ("the applicant"), I write to submit details pursuant to the 'prior approval' of the authority for the following proposal under Class MA of Part 3, Schedule 2 of the Town and Country (General Permitted Development) (England) Order 2015 (as amended). The proposal involves the change of use of the existing building into 52 no. residential units.

The application comprises the documents set out below:

- Covering Letter (This Document);
- Application Form;
- Community Infrastructure Levy Form;
- Noise Impact Assessment, prepared by MZAcoustics;
- Overheating Risk Analysis; prepared by T16;
- Internal Daylight and Sunlight Assessment, prepared by T16 Design; and
- Transport Statement, prepared by RGP.

The following drawings prepared by RG+P have also been submitted to support this application.

- Site Location Plan (drawing reference: 103-225_(SK)200)
- Existing Ground Floor Plan (drawing reference: 103-225_(SK)001B)
- Existing First Floor Plan (drawing reference: 103-225_(SK)002B)
- Existing Second Floor Plan (drawing reference: 103-225_(SK)003B)
- Existing Elevations (drawing reference: 103-225_(SK)009B)
- Proposed Ground Floor Plan (drawing reference: 103-225_(SK)004F)
- Proposed First Floor Plan (drawing reference: 103-225_(SK)005E)
- Proposed Second Floor Plan (drawing reference: 103-225_(SK)006E)

The planning application fee of £13000 plus the £85 service charge, has been paid via the Planning Portal.

Application Site

The site constitutes a part two, part three story L-shaped commercial building (Class E) and associated hardstanding used as a car park to the rear. The site is located on Oxford Road, the road is characterised generally by terraced buildings on either side which are between 2 and 4 storeys. The surrounding area comprises a range of uses, however is predominantly residential and commercial in character.

Directly north of the site comprises a medical surgery and a new residential development which is currently in construction. Directly east of the site lies a row of 3 storey terraced properties and residential accommodation

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blocks which are between 7 and 19 storeys in height. Adjacent to the site to the south lies The Royal Meteorological Society, a grade two listed building, beyond this is Oxford Road which borders the site to the south. To the west of the site is a modern 4 storey residential block completed in 2022.

Other local supporting uses within close proximity include Holy Trinity Church circa 40m to the west, Central Jamme Mosque circa 110m to the south and four medical/dental clinics within circa 250m of the site.

Reading Borough Local Plan documents identify the site being under the following designations:

- West Side Major Opportunity Area
- Allocated development site (CR12c)
- Reading Central Policy Area

The site is well-connected with numerous bus routes serving this location. Reading Train Station (north-east) and Reading West Train Station (west) are both situated only a 14-minute walk from the site providing UK wide services and access to Central London in circa 25 minutes.

The existing building is not locally or statutory listed. As aforementioned, The Royal Meteorological Society, a grade two listed building is adjacent to the site.

There are no trees that are subject to Tree Preservation Orders (TPOs) within or adjacent to the site.

According to the Environmental Agency's Flood Risk Map, the site is situated within Flood Zone 1, meaning there is a low probability of flooding.

The Proposed Development

The proposal comprises the change of use of the existing building from office floorspace (Class E) to provide 3,550 sqm of residential floor space (Class C3). This proposal seeks to deliver 52 self-contained units.

Waste and recycling provision is proposed through an external refuse store, for residual waste, recycling, and food waste.

40 no. cycle spaces are proposed within an external communal cycle store. All spaces will be for the users of the proposed dwellings.

No alterations will be made to the external appearance of the existing building.

The proposed unit mix comprises of:

- 34 – 1B1P
- 6 – 1B2P
- 7 – 2B3P
- 5 – 2B4P

Planning History

Following a desktop search of Reading Borough Council planning applications webpage, the following applications have been considered relevant to the site and are summarised below.

Address / Ref	Proposal	Status / Date
PL/25/1214	Application for prior approval of 2 storey roof extension to accommodate 15 proposed New dwellinghouses on Detached buildings in commercial or mixed use - Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 20, Class AA	Approved (02.12.25)
PL/25/1025	Change of use of the ground, first and second floors of the building from Class E (offices) to C3 (dwelling houses) to comprise 40 x1 bedroom and 12 x2 bedroom dwelling units. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.	Approved (23.09.25)
PL/25/0770	Change of use of building from Class E (offices) to C3 (dwelling houses) to comprise 52 dwelling units. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.	Refused (16/07/25)
PL/25/0769	Application for prior approval of a proposed: 20 New dwellinghouses on detached buildings in commercial or mixed use - Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 20, Class AA	Refused (16/07/25)
PL/21/0639	Demolition and residential redevelopment to provide three buildings comprising 120 residential units (Use Class C3), along with car parking, cycle parking, servicing bay and associated landscaping, amenity space, plant and refuse areas, and access arrangements.	Refused (26/06/2024)
PL/19/0419	Change of use from Class B1(a) (offices) to C3 (dwelling houses) to comprise 58 Units. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.	Prior Approval Not Required (14/05/2019)

Relevant recent planning history surrounding the site is also summarised below.

Address / Ref	Proposal	Status / Date
PL/20/1104	Demolition of the existing building and redevelopment of the site to provide a residential building of 5 storeys (Use Class C3) and associated public realm improvements	Granted subject to legal agreement (10/11/2023)

PL/22/0486	Various works associated with conversion of existing building from 4 to 6 residential units (Class C3), including roof extension with external terrace, replacement entrance, window and door changes, new steps to lower ground floor, cycle store, boundary works, landscaping and associated alterations (amended description).	Granted subject to legal agreement (16/08/2023)
PL/21/0349	Demolition of the existing buildings on site and erection of a 3 – 5 storey building to provide 54 residential units (Class C3). Provision of private and communal external amenity areas, car and cycle parking and refuse storage.	Granted (17.12.21)
PL/15/0721	Erection of part 4, part 5 storey building providing 16 (2x1, 13x2 & 1x3-bed) residential units (Class C3) with associated parking and landscaping, following demolition of existing buildings (Class A1 / B8/ nil use). (amended description)	Granted subject to legal agreement (17.02.16)

Class MA Permitted Development Rights

“Class MA” rights came into being on 1st August 2021 and allow for development consisting of the 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 of the Use Classes Order to a use falling within Class C3 (dwellinghouses) of Schedule 1 of that Order. The new right is introduced following changes to the Use Class Order which created a new Class E which include a number of uses that previously fell under Class A1, Class A1, Class A3, Class B1 and part of Class D1 and Class D2.

Class MA states:

Permitted development

MA. Development consisting of a change of use of a building and any land within its curtilage from a use falling within Class E (commercial, business and service) of Schedule 2 to the Use Classes Order to a use falling within Class C3 (dwellinghouses) of Schedule 1 to that Order.

Development not permitted

MA.1.—(1)Development is not permitted by Class MA—

- (a) 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;
- (b) 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;
- (c) 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;
- (d) if the site is occupied under an agricultural tenancy, unless the express consent of both the landlord and the tenant has been obtained; or
- (e) 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.

(2) The classes mentioned in sub-paragraph (1)(b) are the following classes of the Use Classes Order—

- (a) the following classes of the Schedule as it had effect before 1st September 2020—
 - i) Class A1 (shops);
 - ii) Class A2 (financial and professional services);
 - iii) Class A3 (food and drink);
 - iv) Class B1 (business);
 - v) Class D1(a) (non-residential institutions – medical or health services);
 - vi) Class D1(b) (non-residential institutions – crèche, day nursery or day centre);
 - vii) Class D2(e) (assembly and leisure – indoor and outdoor sports), other than use as an indoor swimming pool or skating rink;
- (b) on or after 1st September 2020, Class E (commercial, business and service) of Schedule 2.

Conditions

MA.2.—(1) Development under Class MA is permitted subject to the following conditions.

(2) Before beginning development under Class MA, the developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to—

- a) transport impacts of the development, particularly to ensure safe site access;
- b) contamination risks in relation to the building;
- c) flooding risks in relation to the building;
- d) impacts of noise from commercial premises on the intended occupiers of the development;
- e) where—
 - i) the building is located in a conservation area, and
 - ii) the development involves a change of use of the whole or part of the ground floor, the impact of that change of use on the character or sustainability of the conservation area;
- f) the provision of adequate natural light in all habitable rooms of the dwellinghouses;
- g) the impact on intended occupiers of the development of the introduction of residential use in an area the authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses;
- 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; and
- (i) where the development meets the fire risk condition, the fire safety impacts on the intended occupants of the building.

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

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

(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.”;

(c) in sub-paragraph (7) for “(5) and (6)” there were substituted “(5), (6) and (6A)”;

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

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

Paragraph MA.1 of Class MA

Paragraph MA.1 details instances where development under Class MA development is *not* permitted. Compliance with this criteria is set out in the table below.

Class MA.1 Criteria	Assessment
a) Unless the use of the building fell within one or more of the use classes specified in sub-paragraph (2) for continuous period of at least 2 years prior to the date of the application for prior approval	The premises is in commercial use (Class E) and have been for at least 2 years.
b) If land covered by, or falls within the curtilage of, the building- i. is or forms part of a site of special scientific interest; ii. is or forms part of a listed building or land within its curtilage; iii. is or forms part of a scheduled monument or land within its curtilage; iv. is or forms part of a safety hazard area; or v. is or forms part of a military explosives storage area.	The site is not on land covered by, nor does it fall within the curtilage of, any of the identified assets.
c) 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	The building is not located within any of the identified designations.

v. <i>A World Heritage Site</i>	
d) <i>If the site is occupied under an agricultural tenancy, unless the express consent of both the landlord and tenant has been obtained</i>	The site is not occupied under an agricultural tenancy.
e) <i>Before 1 August 2022, if-</i> i. <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</i> ii. <i>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.</i>	Not applicable.

Paragraph MA.2 of Class MA

Paragraph MA.2 states that: where any development under Class MA is proposed, development is permitted subject to the condition that before beginning the development, the developer must apply to the local planning authority for prior approval of the authority 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;*
- (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(4), 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.*

Development under Class MA is permitted subject to the condition that it must be completed within a period of 3 years starting with the prior approval date.

Procedure For Applications For Prior Approval Under Part 3

The following is provided in accordance with requirements of Paragraph W (2):

- a. Written description of the proposed development.

Change of use of Eaton Court, 104-112 Oxford Road, Reading, RG1 7NG from commercial (Class E) into 52 no. residential units.

- b. A plan indicating the site and showing the proposed development.

Enclosed within this application are a site location plan, existing and proposed internal layout plans of the proposed accommodation, as well as existing and proposed sections.

- b(a). A statement specifying the net increase in dwellinghouses proposed by the development

The proposals result in a net increase of 52 no. dwellinghouses.

- b(b). A floor plan indicating the total floor space in square metres of each dwellinghouse, the dimensions and proposed use of each room, the position and dimension of windows, doors and walls, and the elevations of the dwellinghouse.

Enclosed with this application are existing and proposed floorplans showing the dimensions of each dwelling, the dimensions and use of each room and the position and dimensions of all windows, doors and walls. Existing and proposed elevations and sections are also submitted as part of the application.

- c. The developer's contact address.

32 Castlewood Road, London, United Kingdom, N16 6DW

- d. The developer's email address.

All correspondence should be with the Developer's Planning Agent, Savills.

thomas.noble@savills.com

Assessment

Application ref. PL/25/1025 was granted by the council on 23th September 2025. This was for an identical proposal.

Certain parts of Paragraph MA.2 are not considered below as they are not relevant to the application site. These are part (g) as the site is located in an area with existing residential use. The proposal involves the loss of existing office floor space and not a nursery or health centre, meaning part (h) does not need to be assessed.

Part (i) stipulates that where the development meets the fire risk condition, the fire safety impacts on the intended occupants of the building should be assessed. The fire safety condition, as stated in Article 9A of the Town and Country Planning (Development Management Procedure) (England) Order 2015, applies when a development contains two or more dwellings **and** is over the 18m height or 7 storeys in height threshold.

Eaton Court is below 18m in height and is below 7 storeys in height, therefore does not exceed the threshold for fire safety to be assessed.

Condition (e) of paragraph MA.2 does not apply given the site is not located in a conservation area.

The remaining conditions are considered below in turn.

Transport Impacts

The site benefits from a sufficient access to existing transport infrastructure. The site is within a 14 minute walk of both Reading Train Station and Reading West Train Station providing UK wide transport links to many stations including major travel hubs such as London Paddington in circa 25 minutes. Additionally, the site also benefits from a number of bus stops. Waylen Street bus stop is located directly outside the site, this provides access to numerous bus routes which serve the stop every 6 minutes throughout the day.

Reading Borough Councils parking standards highlight for a zone 1 development a maximum of 0.5 car parking spaces per unit can be provided. Due to the sites location being adjacent to zone 1 and benefitting from strong sustainable transport infrastructure, this proposal will use these standards and deliver 26 car parking spaces at the ratio of 0.5 spaces per dwelling.

A total of 40 cycle spaces will be provided in line with Reading Borough Council's parking standards. These spaces will be provided in a secure store within the western boundary of the site.

A Transport Statement, prepared by RGP has been submitted alongside this application. This demonstrates a change of use is consistent with relevant transport policy guidance and is not anticipated to give rise to any transport issues.

In determining application ref. PL/25/1025, it was demonstrated that the transport impact was not deemed as a reason for not giving prior approval for conversion of the floorspace to residential on site. There have been no amends within this application which will change the transport impact.

This demonstrates that there will be no adverse 'transport impacts of the development, particularly to ensure safe site access' as required under Paragraph MA.2(a) of Class MA.

Contamination Risks

The site is currently vacant, the site was most recently in commercial use as a Centre for Health and Disability Assessments for the Department for Work and Pensions, this does not pose a risk of contaminating the site. There are no land use designations which apply to the site which identify that the site may be subject to contamination risks. Land uses in close proximity to the site are predominantly residential and commercial uses, these uses also do not present a contamination risk.

As outlined above, the current building has a very limited planning history with only minor development having been undertaken, neither of which will have had an impact on the contamination of the site.

In determining application ref. PL/25/1025, it was demonstrated that the contamination risk was not deemed as a reason for not giving prior approval for conversion of the floorspace to residential on site. There have been no amends within this application which will change the contamination risk.

This demonstrates that there will be no 'contamination risks in relation to the building' as required under Paragraph MA.2(b) of Class MA.

Flood Risk

The site is located within Flood Zone 1 (less than 0.1% annual probability of river flooding).

As a permitted development application, the proposals submitted under this application only alter the use of the site. The impermeable footprint of the site and external ground levels remain unaltered. As a result, there would be no alteration to the existing surface water drainage network, and no impact as a result of the Proposed Development.

In determining application ref. PL/25/1025, it was demonstrated that the flood risk was not deemed as a reason for not giving prior approval for conversion of the floorspace to residential on site. There have been no amends within this application which will change the flood risk.

The above demonstrates that there will be no adverse 'flooding risks in relation to the building' as required under Paragraph MA.2(c) of Class MA.

Noise Assessment

The site has a southern frontage onto Oxford Road and eastern frontage onto Eaton Place. The remainder of the site is sheltered from roadways via hardstanding which is car parking for the site. The surrounding area is generally residential with some commercial space typically occupying ground floor units of terraced properties.

A Noise Impact Assessment has been prepared by Quantum Acoustics which sets out mitigation measures to meet the recommended internal noise levels provided in BS8233 to protect the proposed dwellings from external noise impacts. The report concludes that noise from existing commercial uses in the immediate vicinity of the site should not have an adverse impact on the amenity or health of future occupiers of the apartments. The creation of new residential units does not raise any noise impacts of concern that would hinder the operations of existing commercial uses in the locality. Therefore, the proposed development complies fully with national and local planning policy on noise.

In determining application ref. PL/25/1025, it was demonstrated that there will be no adverse impacts of noise from commercial premises on the intended occupiers of the development. There have been no amends within this application which will change the impacts from commercial noise.

This demonstrates that there will be no adverse 'impacts of noise from commercial premises on the intended occupiers of the development' as required under Paragraph MA.2(d) of Class MA.

Provision of Natural Light

An Internal Daylight Assessment has been conducted by T16 Design. The Daylight Assessment has been undertaken in conformity to the methodology and criteria provided by the Building Research Establishment's (BRE) guidance 'Site layout planning for daylight and sunlight: A guide to good practice' (BRE 209 3rd edition, 2022), which in turn references the British Standard BS EN17037:2018 'Daylight in buildings'.

The Daylight Assessment uses the Daylight Illuminance Test utilises climatic data for the location of the site, based on a weather file for a typical or average year, to calculate the illuminance at points within a room on at least hourly intervals across a year. The illuminance is calculated across an assessment grid sat at the reference plane. Guidance provides target illuminance levels that should be achieved across at least half of the reference plane for half of the daylight hours within a year. For spaces with a shared use such as combined living kitchen and dining rooms or a studio dwelling, the 'living room' target of 150 lux is used.

The results of the daylight illuminance assessment demonstrate that 52 (100%) of the 52 residential units surpass the BRE guidance criteria. The results of the technical analysis have shown that all rooms would receive lux levels in line with the illuminance targets.

In determining application ref. PL/25/1025, it was demonstrated that the provision of natural light was not deemed as a reason for not giving prior approval for conversion of the floorspace to residential on site. There have been no amends within this application which will change the provision of natural light.

This demonstrates that there will be 'adequate natural light in all habitable rooms of the dwellinghouses' as required under Paragraph MA.2(f) of Class MA.

Nationally Described Space Standards

The nationally described space standards require a 1 storey 1 bedroom (1 person) dwelling to be at least 39sqm in size (37sqm if there is a shower room instead of a bathroom). The nationally described space standards require a 1 storey 1 bedroom (2 person) dwelling to be 50sqm in size and a 1 storey 2 bedroom (3 person) bedroom to be 61 sqm in size. The nationally described space standards require a 1 storey 2 bedroom (4 person) dwelling to be 70sqm.

The current proposals are demonstrated to meet the minimum space standards, as shown on the submitted Proposed Floorplans which demonstrate unit sizes as well as bedroom and storage space. It is therefore demonstrated the proposals meet the minimum space standards.

As such, all proposed units comply with the minimum standards as described above.

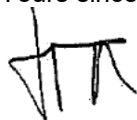
Conclusion

The proposal comprises the change of use of the ground floor of Eaton Court, from office floorspace (Class E) to provide 3550 sqm of residential floorspace (Class C3). This proposal seeks to deliver 52 self-contained units.

As required under Paragraph MA.2 of Class MA it has been demonstrated that there are no transport, contamination, flooding, noise, daylight access or dwelling size reasons why the development should not proceed.

Should you have any queries on the proposal, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Tom Noble", written over a horizontal line.

Tom Noble
Savills Planning