

DELEGATED APPLICATION REPORT

Ward: Tilehurst

App Ref: PL/24/0866 Full planning permission

Address: 74 School Road, Tilehurst, Reading RG31 5BN

Proposal: Conversion from Class E office to 2no flats C3 to first floor areas

Applicant: Mr Nick Edwards

Received date: 2024-07-08

Target Decision date: 2024-09-02 EOT requested but not agreed

Case Officer: Marcelina Rejwerska

1. SITE DESCRIPTION

The site comprises the upper floors above a vacant bank in the Tilehurst Triangle district centre. The property is identified as a key frontage within this area. The terrace of commercial properties is characterised by mixed residential, and office uses on the upper floors. There is a private service/parking yard at the rear, accessed from Dunstall Close to the north-east. The site is within an Article 4 Direction area removing permitted development rights for conversions from office use to residential (Class MA).



Left: Application site as seen from School Road. Right: Rear of the site. Images taken by planning officer on 09/09/24.

Over the course of the application, the development as described has been completed and both flats are currently occupied.

2. PROPOSAL AND SUPPORTING INFORMATION

Permission is sought for conversion of the first floor from office use (Class E) to 2x 1-bedroom flats (Class C3). As the applicant completed the development over the course of the application, the application is now retrospective. The flats are accessed from the rear of the property. The flats measure:

Flat 1

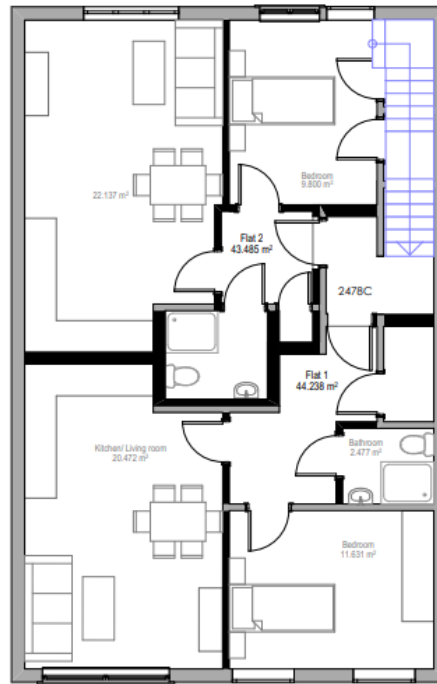
GIA 44.23m²

Bedroom 11.6m²

Flat 2

GIA 43.48m²

Bedroom 9.8m²



Proposed Floor Plan

2.1. Information Submitted:

- 9329-24 Design & Access Statement, dated 02/07/24
- 9329-100 Location Plan, dated 01/05/24
- 9329-103 Existing Plans, dated 01/05/24
- 9329-106 Existing Elevations, dated 01/05/24
- 9329-105 Existing Roof Plan, dated 01/05/24
- 9329-101 Existing & Proposed Block Plan, dated 01/05/24
- 9329-110 Proposed Roof Plan, dated 01/05/24
- 9329-108 Proposed Ground & First Floor Plan, dated 01/05/24
- 9329-112 Proposed Elevations, dated 01/05/24

Received by the LPA on 8 July 2024

3. RELEVANT PLANNING HISTORY

- PL/91/0949 – Rear ground floor extension and internal alterations – Application permitted
- PL/92/0786 – Replacement of existing fascia sign at rear and at the front of building and erection of new projecting sign – Application permitted
- PL/00/0508 – Installation of 60cm Satellite Antenna – Application permitted
- PL/02/0817 – External signage alteration – Application permitted
- PL/14/1993 – 1 fascia sign at front and 1 at rear, 1 projecting sign, ATM surround signage and 3 purple vinyl cladding – Application permitted
- PL/21/0930 – Installation of 1no. internal 55" window digital screen, external facing – Application permitted

- PL/23/0452 – Removal of ATM and Night Safe Bezel, existing signage and reinstate materials where required – Application permitted
- PL/24/0798 - Change of use from Class E (offices) to C3 (dwelling houses) to comprise 1 flat. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015. – Application closed
- PL/24/0569 - Change of use of 1st Floor from Class E (offices) to C3 (dwelling houses) to comprise 2 flats. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015. – Application refused
- PL/24/0858 – Conversion from Class E office to 1 no flat C3 to rear of ground floor area – Refused

4. CONSULTATIONS

The following were consulted:

- RBC Transport Development Control
 - The application site lies within Tilehurst District Centre and is in a highly sustainable location in terms of proximity to local services and transport links to Reading town centre. The C402 School Road has parking restrictions preventing on-street parking and forms part of the Red Route 'no stopping' corridor. There is a Council owned public car park located to the rear off Dunstall Road and charges apply between 6am to 6pm Monday to Saturday.
 - Local parking standards are set out in the RBC, Revised Parking Standards and Design Supplementary Planning Document (SPD) which takes into account the accessibility of the site. The site is located in Zone 3, Secondary Core Area and the parking requirement in this zone is 1 space per 1-2 bedroom dwelling.
 - There is a private car park located to the rear of the building and the planning statement indicates that 1 no parking space is proposed for each flat with 1 no car parking space allocated for the Class E ground floor premises. No parking is provided for the ground floor residential flat proposed under app ref 240858.
 - Good quality cycle storage should be provided. It is stated that cycle storage is to be provided within the rear service area with the Metrostar containers. The proposed location is acceptable, however, we require detailed plans confirming that the cycle parking provision meets the Council's adopted standards in terms of provision and layout. I am, however, happy for this to be dealt with by way of a condition.
 - Further details regarding refuse collection points is also required and should be covered by condition.

The following addresses were consulted by letter:

- 72a School Road, Tilehurst, Reading, RG31 5AW
- 72 School Road, Tilehurst, Reading, RG31 5AW
- 76 School Road, Tilehurst, Reading, RG31 5AW
- 70 School Road, Tilehurst, Reading, RG31 5AW

No letters of representation received.

5. LEGAL AND PLANNING POLICY CONTEXT

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'. However, the NPPF

does not change the statutory status of the development plan as the starting point for decision making (NPPF paragraph 12).

National Policy and Guidance

National Planning Policy Framework

National Planning Practice Guidance

Reading Borough Local Plan (2019)

CC1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

CC5: WASTE MINIMISATION AND STORAGE

CC7: DESIGN AND THE PUBLIC REALM

CC8: SAFEGUARDING AMENITY

H1: PROVISION OF HOUSING

H2: DENSITY AND MIX

H3: AFFORDABLE HOUSING

H5: STANDARDS FOR NEW HOUSING

H8: RESIDENTIAL CONVERSIONS

H10: PRIVATE AND COMMUNAL OUTDOOR SPACE

TR1: ACHIEVING THE TRANSPORT STRATEGY

TR3: ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS

TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING

RL3: VITALITY AND VIABILITY OF SMALLER CENTRES

SPD

Affordable Housing (2021)

Revised Parking Standards and Design (2011)

Residential Conversions (2013)

Planning Obligations under Section 105 (2015)

Reading Borough Local Plan Partial Update Pre-Submission Draft (2025)

Equality Act 2010:

In determining this application, the Council is required to have regard to its obligations under the Equality Act 2010. However, there is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application. Therefore, in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

Local Plan Update

The current version of the Local Plan (adopted in November 2019) turned five years old on Tuesday 5th November 2024. The Local Plan was reviewed in March 2023 and around half of the policies in the plan are considered still up to date. However, the rest need to be considered for updating to reflect changing circumstances and national policy. A draft version of the Local Plan Partial Update was submitted to the Secretary of State on 9th May 2025 and is currently at examination.

Although there is a five-year period for carrying out a review of a plan after it is adopted, nothing in the NPPF or elsewhere says that policies automatically become “out of date” when they are five years old. It is a matter of planning judgement rather than legal fact whether a plan or policies within it are out-of-date. This will depend on whether they have been overtaken by things that have happened since the plan was adopted, either on the ground or through changes in national policy, for example.

Officer advice in respect of the Local Plan policies pertinent to this application is that they remain in accordance with national policy (aside from Policy H1, which is acknowledged to be out-of-date) and

that the objectives of those policies remains very similar in the submission draft updated Local Plan. Therefore, they can continue to be afforded weight in the determination of this planning application and are not considered to be 'out of date' (aside from Policy H1).

6. APPRAISAL

6.1. Land Use Matters

The NPPF seeks to 'boost significantly the supply of housing' and deliver a wide range of homes, of different types and tenures. Achieving an efficient use of the land within the context of any central and sustainability located site is a key priority both at a national and local level. The NPPF states that LPAs should actively "*encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value*". Policy H2 (Density and Mix) specifically considers density and mix and requires that an appropriate density of residential development is informed by the character and mix of uses of the area in which it is located and its current and future level of accessibility.

Policy H1 sets out the housing provision over the plan period. As the Local Plan is now over 5 years old, this policy is considered out of date. The draft Local Plan Partial Update comprises updated housing need and provision figures based on the Housing Needs Assessment carried out in 2024. The principle of the policy is the same and the proposal would be considered a positive contribution to the housing needs of the Borough.

The application site is a windfall site – it is not allocated for residential development. Whilst windfall sites are considered an important aspect in the provision of housing within the Borough, the public benefit has to be weighed against other material policy considerations, including high quality design.

The proposal comprises of conversion of a vacant office space and provision of 2x new residential units which contribute to meeting the housing need identified in the Borough, and is considered acceptable in this respect, subject to all other material considerations.

6.2. Design and Character

Paragraph 135 of the NPPF 2024 details that decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character including the surrounding built environment. Policy CC7 requires all development to be of high-quality design and maintain and enhance the character and appearance of the surrounding area. Policy H5 is also relevant and sets out standards for new housing, including minimum space standards.

At the rear of the site, there is an external staircase which provides access to the first floor. The proposal includes the removal of this staircase, replacement of the door with a full-length window, and alterations to the ground floor to create a private access lobby from the rear for residents to access from the ground floor. This is considered acceptable and improves the appearance of the site from the rear.

The internal layout of the flats meets the nationally set out minimum space standards for single-occupancy units and as such would be considered acceptable should the application have been recommended for approval.

6.3. Residential Amenity

Policy CC8 seeks to ensure that new development does not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties.

The proposal due to minimal external alterations poses no identified risk of harm in any manner to nearby residential properties.

There are a number of identified risks to future occupants due to the nature of the location in a commercial area. There are a number of air conditioning units at the rear elevation of adjoining commercial premises. The ground floor is also proposed to be kept as existing (Class E). Should the application have been recommended for approval, a condition would have been recommended to secure appropriate acoustic insulation to ensure the future occupants are not put at risk of unreasonable noise levels both internally and from the various mechanical plants externally.

There are no other identified risks of harm to the future occupiers identified. The fenestration layout is proposed to stay as existing, which allows adequate access to natural sunlight/daylight.

Policy H10 is also relevant and seeks to secure functional private or communal open space, including green space where possible, for all new dwellings. Due to the nature of the surrounding area, it is not possible to provide any meaningful private or communal outdoor space. On balance, this would have been considered acceptable in this case as the residents would have access to nearby open green spaces which would offset some of the harm created.

6.4. Transport Matters

Policy TR5 requires all new development to provide appropriate levels of car parking, cycle parking depending on the location within the borough. Policy CC5 is also relevant and requires demonstration of good design to waste storage, reuse, and recycling.

Local parking standards are set out in the RBC, Revised Parking Standards and Design Supplementary Planning Document (SPD) which considers the accessibility of the site. The site is located in Zone 3, Secondary Core Area and the parking requirement in this zone is 1 space per 1–2-bedroom dwelling.

There is a private car park located to the rear of the building and the planning statement indicates that 1no parking space is proposed for each flat with 1no car parking space allocated for the Class E ground floor premises.

Had the scheme been recommended for approval, conditions would have been recommended to secure the details of proposed cycle storage, refuse storage and collection arrangements.

6.5. Affordable Housing & CIL

The proposed new residential unit would be required to provide a policy compliant level of off-site affordable housing contribution. Policy H3 states *“on sites of 1 – 4 dwellings, a financial contribution will be made that will enable the equivalent of 10% of the housing to be provided as affordable housing elsewhere in the Borough”*. The Affordable Housing SPD further outlines that *“For sites of 1-4 dwellings, where the contribution required by policy H3 is 10%, this will equate to 5% of GDV of the development.”*

An up-to-date assessment of the need for Affordable Housing that exists in the Borough is within the supporting text for Policy H3 (para 4.4.21) of the Reading Borough Local Plan Submission Draft Partial Update May 2025 which states the following:

“The Reading Housing Needs Assessment (HNA, 2024) has once again emphasised the critical need for affordable housing within Reading as well as the remainder of Berkshire. The HNA identified a need for 406 additional affordable homes per year in Reading, which represents a substantial proportion of the overall housing required. The consequences of not providing much-needed affordable homes would be severe, and would include homelessness, households in temporary or unsuitable accommodation, overcrowding and younger people having to remain living with parents for increasing periods. Insufficient affordable housing will also act as an impediment to economic growth, as firms will face increasing problems with accommodation for their workforce. Meeting even a substantial proportion of the identified housing need presents significant challenges, and it is therefore critical that new residential development of all sizes makes whatever contribution it can”.

As such, it is considered that Policy H3 is still relevant and applicable.

The applicant agreed the Heads of Terms for a Section 106 agreement with the LPA on 3 October 2024, and the LPA instructed the Council Legal department on 10 October 2024 to write up the S106 legal agreement. Since then, the applicant has failed to work with the LPA to sign the agreement. Furthermore, the LPA was informed in March 2025 that the development has been completed and is now occupied. Since then, the agent has made little effort to progress the application and work with the LPA. Due to this, the application is being recommended for refusal, on the basis that the agent has failed to enter into a Section 106 legal agreement to secure a policy compliant contribution to affordable housing in the Borough.

7. CONCLUSION

The applicant has failed to sign a Section 106 agreement with the LPA to secure a contribution towards affordable housing in the Borough.

The existing Local Plan, the emerging Local Plan and the NPPF are all aligned in their overall objective of creating mixed and balanced communities, and the delivery of an appropriate mix of housing types for the local community which includes affordable housing (NPPF Para 63). When considering the relative weight to be given to the various benefits and harms identified, it should be in the context of this need for housing which meets identified needs.

Therefore, the failure to meet identified housing need in terms of affordable housing amounts to substantial harm. The absence of affordable housing will have practical, tangible and absolute impacts on the ability of the Borough to house its residents and would be in direct conflict with the aims and objectives of existing and emerging development plan policy and the NPPF in respect of achieving sustainable, mixed and balanced communities.

8. RECOMMENDATION

REFUSE

Due to the following reasons:

1. In the absence of a completed legal agreement to secure an appropriate financial contribution towards the provision of affordable housing elsewhere in the Borough, the proposal fails to make an appropriate contribution to the housing needs of Reading Borough, contrary to Policies H3 of the Reading Borough Local Plan (2019), Affordable Housing Supplementary Planning Document (2021), Planning Obligations under Section 106 SPD (2015) and paragraphs 11, 63, 64, 66 of the NPPF 2024.