

PLANNING STATEMENT

Prior Approval under Schedule 2, Part 3, Class MA

**Change of Use from Class E to Class C3
to Provide 10 Self-Contained Dwellings**

92 Audley Street, Reading, RG30 1BS

1. Introduction

This Planning Statement supports an application for prior approval under Schedule 2, Part 3, Class MA for the change of use of part of the existing Class E building at 92 Audley Street to provide 10 self-contained Class C3 dwellings.

The application follows previous Class MA applications PL/25/1376 and PL/26/0356. The most recent application, PL/26/0356, was refused on two matters: noise from commercial premises under MA.2(d) and adequate natural light under MA.2(f).

The current submission is accompanied by materially expanded specialist evidence prepared specifically in response to those matters: Environmental Noise Assessment P1940-PA-REP-05 by Polaris Acoustics and Daylight and Sunlight Assessment Ref. 4604 by Environmental Protection Strategies Ltd (EPS).

2. Site and Proposed Development

The application relates to part of the existing commercial building at 92 Audley Street. The lawful Class E use of the relevant premises has previously been established, including through Certificate of Lawfulness PL/24/1564.

The proposal is for the change of use of the relevant floorspace to provide 10 self-contained dwellings. Commercial uses are retained within the wider building, including welding/fabrication, fitness/gym and dog-grooming uses. The current acoustic evidence expressly considers the relationship between those uses and the proposed residential accommodation.

3. Class MA and Matters Previously Found Acceptable

The Council's determination of PL/26/0356 did not identify transport, contamination, flooding or dwelling size as reasons for refusal. It also found that the other applicable Class MA matters did not prevent the development. There has been no material change relevant to those conclusions.

The current submission therefore focuses on the two matters which resulted in refusal of PL/26/0356: noise from commercial premises and adequate natural light.

4. Noise from Commercial Premises - MA.2(d)

PL/26/0356 was refused because the Council considered that the previous evidence did not sufficiently demonstrate the effect of noise from the retained commercial uses on future occupiers. In particular, the delegated report identified limited evidence on noise transfer from the welding/fabrication and fitness uses, questioned the performance of the separating construction, and stated that "a demonstration the building has a 55 dBA attenuation is required." Polaris REP-05 has been prepared to address those points directly.

4.1 Investigation of the Existing Construction and Commercial Uses

Polaris has investigated the existing separating construction rather than relying on an assumed wall performance. The existing masonry/blockwork wall is modelled at $R_{w(C;Ctr)} 55(-2;-6)$ dB. The assessment concludes that the existing wall should not be relied upon alone to achieve the adopted internal commercial-noise transfer target under the more onerous workshop and fitness scenarios.

The retained commercial environment has also been investigated in greater detail. For the welding/fabrication use, Polaris assesses a busy-hour source level of 95 dB LAeq,1hr together with an upper-sensitivity scenario of 100 dB LAeq,1hr. The fitness/gym use is assessed using 80, 85 and 90 dB LAeq,1hr scenarios representing general gym activity, amplified group exercise and an upper-sensitivity case.

Bubbles Dog Grooming is considered within the same assessment of the retained commercial environment. Polaris records that intermittent barking was audible externally in limited locations with a direct line of sight to the eastern part of the building, but was not audible within the proposed residential demise during the attended observations and did not control the measured noise climate at the proposed residential facade.

4.2 Enhanced Separating Construction

Because the existing wall is not relied upon alone, a defined acoustic upgrade forms part of the proposed scheme. The existing masonry/blockwork wall is retained and supplemented on the residential side by an independent acoustic lining comprising staggered steel studs, 75 mm fibreglass insulation at 22 kg/m³ and two layers of 15 mm Gyproc DuraLine, or equivalent high-density plasterboard, together with appropriate acoustic sealing and control of flanking paths.

The enhanced construction is modelled at $R_w(C;Ctr)$ 87(-3;-10) dB. Polaris does not assume that the full laboratory-modelled value will be achieved on site: a separate 5 dB model-to-site de-rating is applied in the receiving-room calculations to allow for workmanship, junction detailing, service penetrations, residual flanking transmission and normal construction variability. The upgrade is therefore a substantive mitigation measure forming part of the proposal, not a matter deferred for later design.

4.3 Predicted Internal Noise Levels and Facade Performance

With the enhanced separating construction, the 95 dB welding/fabrication scenario gives a predicted internal level of 11 dB LAeq and the 100 dB upper-sensitivity scenario gives 16 dB LAeq. Both are below Polaris's deliberately conservative 25 dB LAeq,T internal commercial-noise transfer design objective; the upper-sensitivity case remains 9 dB below that objective. The assessed fitness/gym scenarios also remain below the same design objective.

The current assessment also resolves the previous uncertainty over facade and ventilation performance. Polaris physically tested the existing facade assembly, including glazing, frames, seals and trickle ventilators in their open position, and incorporates the measured performance into the assessment.

The retained commercial uses have therefore been considered, the existing separating construction has been investigated, a defined enhanced wall forms part of the scheme, conservative real-world allowances have been applied and the predicted internal commercial-noise levels remain below the adopted design objective. The requirements of MA.2(d) are therefore satisfied.

5. Adequate Natural Light - MA.2(f)

PL/26/0356 raised two distinct natural-light concerns: that rooms reliant on the existing wired attic glazing would not receive adequate natural light and would appear gloomy, and that four dwellings did not achieve the BRE sunlight targets. The updated EPS assessment addresses each point directly.

5.1 Existing Wired-Glass Attic Glazing - On-Site Measurements

EPS inspected the attic glazing and confirmed that the existing windows are fitted with wired cast glass. To test the Council's specific concern about the light admitted through that glazing, EPS undertook physical illuminance measurements within the existing attic with the windows in their current condition, including the existing level of dirt and soiling.

The measured results were 868 lux at 2.5 m and 320 lux at 5.3 m from the northern windows, and 4,044 lux at 1.0 m and 653 lux at 5.8 m from the southern windows.

EPS refers to the BRE bedroom criterion of at least 100 lux over 50% of the room area. Significantly, the readings at the furthest measurement points from the northern and southern glazed apertures were 320 lux and 653 lux respectively, both above the 100 lux threshold. These on-site measurements provide direct physical evidence addressing the previous concern about the ability of the existing wired glazing to admit adequate natural light.

5.2 Proposed Layout - Daylight

The formal assessment of the proposed accommodation demonstrates that all 18 proposed habitable rooms satisfy the applicable Illuminance daylight criterion. There are no daylight failures within the proposed accommodation.

5.3 Sunlight

The previous delegated report stated that "four units would not achieve the BRE sunlight targets". The updated EPS assessment now demonstrates that all 10 proposed dwellings satisfy the applicable BRE sunlight recommendation. The specific sunlight deficiency identified in PL/26/0356 has therefore been addressed.

5.4 Conclusion on Natural Light

The updated evidence therefore answers both strands of the previous refusal: direct on-site measurements address the Council's concern about the existing wired attic glazing, while the proposed-layout assessment demonstrates that 18/18 habitable rooms satisfy the daylight criterion and 10/10 dwellings satisfy the BRE sunlight recommendation. The requirements of MA.2(f) are therefore satisfied.

6. Direct Response to PL/26/0356

The material findings in the previous delegated report are matched below to the evidence now submitted.

PL/26/0356 finding	Current submission
Limited evidence of welding/fabrication noise transfer	95 dB busy-hour and 100 dB upper-sensitivity workshop scenarios are assessed. With the enhanced wall, predicted internal levels are 11 dB and 16 dB LAeq, both below the 25 dB LAeq,T design objective.
Limited assessment of the fitness/dance use	80, 85 and 90 dB LAeq,1hr fitness scenarios are expressly assessed; predicted internal levels remain below the adopted design objective.
Separating construction not demonstrated to provide sufficient control	The existing wall has now been investigated and modelled at Rw(C;Ctr) 55(-2;-6) dB. It is not relied upon alone: a defined independent acoustic lining forms part of the proposal and is modelled at Rw(C;Ctr) 87(-3;-10) dB, with a separate 5 dB model-to-site de-rating in the receiving-room calculations.
Acoustic mitigation / facade performance appeared to require later verification	The acoustic upgrade is defined now. The existing facade assembly was physically tested with glazing, frames, seals and trickle ventilators open, and the measured performance is incorporated into REP-05.
Existing wired attic glazing considered inadequate and rooms reliant upon it likely to appear gloomy	EPS inspected the wired-cast glazing and measured illuminance on site in its existing condition. At the furthest northern and southern measurement points, 320 lux and 653 lux were recorded respectively, both above the 100 lux BRE bedroom threshold referred to by EPS. Separately, the formal proposed-layout assessment demonstrates that all 18/18 proposed habitable rooms satisfy the applicable Illuminance daylight criterion.
Four dwellings did not achieve the BRE sunlight targets	The updated assessment demonstrates that 10/10 proposed dwellings satisfy the applicable BRE sunlight recommendation.

7. Conclusion

The current submission directly addresses the two matters which resulted in refusal of PL/26/0356. For noise, the existing construction and retained commercial uses have been investigated, a substantive enhanced acoustic wall forms part of the proposal, and the resulting internal noise levels remain below the adopted design objective. For natural light, direct on-site measurements address the Council's concern about the wired attic glazing, while the proposed-layout assessment demonstrates that all 18 habitable rooms satisfy the daylight criterion and all 10 dwellings satisfy the BRE sunlight recommendation.

Prior approval should therefore be granted.