

PLANNING APPLICATION FOR CHANGE OF USE FROM CLASS E OFFICES TO CLASS F1 PLACE OF WORSHIP

PLANNING, DESIGN AND ACCESS STATEMENT

**ATTENBOROUGH HOUSE, 15 BENNET ROAD,
READING, RG2 0QX**

ON BEHALF OF CHURCH OF PENTECOST UK

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by Pegasus Group on behalf of the Church of Pentecost (UK) to address planning issues related to a planning application for change of use from Class E office use to Class F1 place of worship use at 15 Bennet Road, Reading.
- 1.2 The Church of Pentecost is currently located in temporary premises in Oxford Road, Reading. The purpose of the move is to establish the church in a permanent building, which will be better suited to its needs.
- 1.3 The planning application is submitted to Reading Borough Council via the Planning Portal. In addition to this Planning, Design and Access Statement and the on-line planning application form, the following documents are submitted:
- Location plan
 - Site plan
 - Existing and proposed floor plans
 - Existing and proposed elevations
 - Transport Statement by Pegasus Group
 - Travel Plan by Pegasus Group
 - Marketing Report and Appendices 1 to 3 by Hicks Baker
 - Appendix 4a Office Lease Transactions
 - Appendix 4b Industrial Lease Transactions
 - CIL Form 1
- 1.4 The application fee for a change of use application is £462.00 (plus £28 admin fee). This fee will be paid to the Council via the Planning Portal by the applicant.

2. SITE DESCRIPTION

- 2.1 The application site is a detached two-storey flat roofed office building, which was constructed about 30-40 years ago. The building has a floor area of 808 sqm, consisting of 421 sqm on the ground floor and 387 sqm on the first floor. There are storage areas with a loading door on the ground floor and the first floor is mostly open plan with partitioned offices.



- 2.2 The property has 5 allocated car parking spaces available at the front of the building and 3 at the rear.
- 2.3 The building is functional in appearance, with floor to ceiling glazed panels on the front elevation. It is located in an industrial estate on the southern side of the town of Reading and it is surrounded by other functional, commercial buildings of similar appearance and dimensions.
- 2.4 The building is currently in use by a charity and is used for furniture sale and storage. However, this is only a temporary use and no official change of use from offices (class E) has been sought or granted.
- 2.5 The rear half of the building is divided up into 4 small industrial units, which are access via a driveway at the side of the building and a car parking area at the rear of the site.

3. RELEVANT PLANNING HISTORY

3.1 Planning application 170094 - Unit 3, Attenborough House, 15 Bennet Road, Reading – retrospective application for the temporary change of use (4 years) from B1/B8 commercial use to D1 community use (communal worship, education and training centre). This planning application concerned only part of Attenborough House (126 sqm) and planning permission was refused on 3rd April 2017 for 2 reasons, as follows:

1. The use of the land and the building erected thereon as a place of worship, education and training (community use D1) results in the continued temporary loss of employment land/floor space within a defined Core Employment Area and results in a harmful risk in undermining the local economy by reducing employment generating opportunities and the range of sites and space available contrary to Policies CS11 (Use of Employment Land for Alternative Uses), CS12 (Maintaining a Variety of Premises) of the Reading Borough Local Development Framework Core Strategy (2008) (as amended) and Policy SA12 (Core Employment Areas) of the Reading Borough Local Development Framework Sites and Detailed Policy Document (2012) (as amended).

2. The parking layout details submitted fail to demonstrate that it complies with the Local Planning Authority's standards in respect of vehicle parking. With the parking spaces for the other units not available to the community (D1) use, failure to comply with the parking standards could result in on-street parking on Bennet Road, adversely affecting road safety and the flow of traffic, and in conflict with Policy CS24 (Car/Cycle Parking) of the Reading Borough Local Development Framework Core Strategy (2008) (as amended) and Policy DM12 (Access, Traffic and Highway Related Matters) of the Reading Borough Local Development Framework Sites and Detailed Policy Document (2012) (as amended).

Both of these potential objections are addressed below, and in the documents supporting our application.

4. PROPOSALS

4.1 The Church of Pentecost is acquiring 15 Bennet Road, including its curtilage, and it is proposing to change the front half of the building from Use Class E offices to Class F1 place of worship/meeting place. How the building will be converted is shown on the submitted plans. All of the changes to the building will be internal with partitions removed and installed to make the spaces meet the needs of the church and its parishioners. There will be no external changes to the building.

4.2 The church currently holds services at Russell Hall on Oxford Road in Reading. The church will make full use of the Bennet Road building to provide a number of services for the congregation and the local community. The weekly timetable of uses will be as follows:

	Activity		Staff		Visitors/clients
Monday	Youth Empowerment 6pm to 8pm	Ancillary Creche	2 staff 1 minister	1 – 2 staff for creche	10-15 attendees
Tuesday	Debt Management Sessions 6pm to 9pm		2 staff		3 attendees
	Immigration Support 6pm to 9pm		2 staff 1 minister		5-8 attendees
Wednesday	Counselling sessions 6pm to 8pm		1 social worker		2 attendees
	Midweek service 7pm to 8.30pm		1 minister		18 attendees
Thursday	Zumba 3pm to 6pm		1 teacher 1 minister		Maximum of 10 attendees per session (approx. 30 over 3 hours)
Friday	Midweek service 7pm to 8.30pm		1 minister		12 attendees
Saturday	Meetings		1 minister		3-5 attendees

	Zumba 4pm to 6pm	1 teacher	Maximum of 10 attendees per session (approx. 20 over 2 hours)
Sunday	English service 10am to 12.30pm	1 minister	45 attendees
	Vernacular service 2pm to 5pm	1 minister	86 attendees

- 4.3 The above activities will generate a certain amount of traffic and parking demand. How this will be addressed is set out in the Transport Statement and Travel Plan, which are submitted with this planning application.

5. RELEVANT PLANNING POLICIES AND MATERIAL CONSIDERATIONS

5.1 Section 38 of the Planning and Compulsory Purchase Act 2004 and section 70 of the Town and Country Planning Act 1990 require that, in determining planning applications, the LPA must have regard to the development plan, unless material considerations indicate otherwise.

5.2 In this case, the development plan is the Reading Borough Local Plan adopted November 2019. Material considerations include the NPPF, as well as supplementary planning documents. The following policies are of relevance:

Reading Local Plan

5.3 **Policy CC1** – Presumption in Favour of Sustainable Development – states that a positive approach will be taken to considering development proposals that reflects the presumption in favour of sustainable development contained in the NPPF.

5.4 **Policy EM2** – Location of New Employment Development – lists several Core Employment Areas, including:

- *EM2d: Bennet Road*

5.5 **Policy EM3** – Loss of Employment Land – states that the overall level of employment land should be maintained. Proposals that would result in a loss of such land will not be permitted other than in exceptional circumstances.

Where, in exceptional circumstances, it can be demonstrated that a site in a Core Employment Area has no long-term prospect of employment use, a related alternative commercial use or a use which complements the employment use of the area may be considered that would not result in a significant reduction in jobs.

In other areas, the following matters will be considered when assessing proposals which would result in a loss of employment land: -

- (i) Is access by a choice of means of transport, including access to the strategic road network, poor, and likely to remain poor?*
- (ii) Is the continued use of the site for employment, including the potential for redevelopment for employment uses, viable?*

- (iii) *Is there a surplus of a similar size and type of accommodation in Reading?*
- (iv) *Would continued employment use of the site detrimentally affect the amenity and character of a residential area?*
- (v) *Is the need for alternative uses stronger than the need for the retention of employment land?*
- (vi) *Would the proposal result in a piecemeal loss of employment land where there is potential for a more comprehensive scheme?*

5.6 **Paragraph 4.3.13** goes on to state that:

The policy recognises that on some exceptional sites within the CEA, there may not be any long-term prospect of re-use or redevelopment for employment, and in these cases it is preferable for a site to be used for an alternative commercial use that complements the area than for it to be vacant in the long-term. Long term vacancy in this case can be taken to mean five years or more, as shorter time periods might be the result of short-term economic conditions. For example, some of the older industrial areas contain large sites that were tailored to the needs of a specific type of operation that no longer exists or operates in the same way, making it unviable to re-let, either in its existing form or sub-divided, in the long-term. If there is also no long-term prospect of redevelopment of these sites for employment, alternative commercial uses under this policy may be considered.

5.7 **Policy TR1** – Achieving the Transport Strategy – this policy states that all development proposals should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling.

5.8 **Policy TR3** – Access, Traffic and Highway-Related Matters – this policy states that developments will only be permitted where:

- i) *Accesses and works to the highway comply with the adopted standards of the Transport Authority;*
- ii) *The development would not have a material detrimental impact on the functioning of the transport network;*

- iii) *The proposals would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists;*
- iv) *The proposal would not generate regular movement of heavy goods vehicles (HGVs) on unsuitable roads, or on roads without easy access to the Classified Highway Network; and*
- v) *For non-residential uses, or new dwellings on classified roads, off-street servicing would be provided.*

- 5.8 **Policy TR4** - Cycle Routes and Facilities – states that developments should make full use of opportunities to improve access for cyclists, including the provision of new facilities, such as cycle parking.
- 5.9 **Policy TR5** – Car and Cycle Parking and Electric Vehicle Charging – states that developments should provide car and cycle parking that is appropriate to the accessibility of the location in relation to sustainable transport facilities, particularly public transport.
- 5.10 **Policy OU1** – New and Existing Community Facilities – this policy states that proposals for new, extended or improved community facilities will be acceptable, particularly where this will involve co-location of facilities on a single site. New community facilities should be located where there is a choice of means of travel (including walking and cycling), and in existing centres where possible.
- 5.11 **Paragraph 4.7.1** – states that quality of life for the residents of Reading is one of the key elements of the vision for the Borough. A good quality of life is not only desirable in itself, but also ensures that Reading remains attractive to investment. The provision of sufficient good quality community facilities is crucial to ensuring that Reading is a place in which people want to live and continue living.
- 5.12 **Paragraph 4.7.2** – states that Community facilities mean different things to different people. The term could encompass health facilities, education and training facilities (at all levels), youth and community centres and meeting places, libraries, places of worship, civic and administrative facilities and recycling facilities and civic amenity sites. (my underlining)

NPPF

- 5.13 **Paragraph 11** states that plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means that proposals which accord with development plan policies should be approved without delay.
- 5.14 **Paragraph 108** states that in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:
- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
 - b) safe and suitable access to the site can be achieved for all users; and*
 - c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*
- 5.15 **Paragraph 109** states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 5.16 **Paragraph 110** states that within this context, applications for development should:
- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
 - b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
 - c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*

d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

5.17 **Paragraph 111** states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

6. ASSESSMENT AGAINST RELEVANT PLANNING POLICIES AND MATERIAL CONSIDERATIONS

6.1 The proposal is the change of use of an office building (use class E) to a place of worship for the Church of Pentecost (use class F1), which will also include a range of weekday services for the community, as set out above, including youth empowerment, debt management, counselling, Zumba classes, and a midweek service. Two main services will be held on Sunday's, when the building will be busiest. The use of the building will employ 4 full-time and 12 part-time people, on a permanent basis, who will provide a range of services that will benefit the health and well-being of many members of the local community.

6.2 With regard to relevant development plan policies, the following issues are most relevant to the proposal:

i) Principle of change of use

6.3 It is accepted that Bennet Road is listed as a Core Employment Area under Local Plan policy EM2, where the loss of employment uses is discouraged. However, policy EM3 states that:

Where, in exceptional circumstances, it can be demonstrated that a site in a Core Employment Area has no long-term prospect of employment use, a related alternative commercial use or a use which complements the employment use of the area may be considered that would not result in a significant reduction in jobs.

6.4 In this case, we are able to demonstrate that the site has no long-term prospect of employment use. A Marketing Report by Hicks Baker (commercial agents) is submitted with this application. This explains that the building has been extensively marketed by a respected local commercial agent from May 2019 to the present day. In that time there have been only 7 viewings of the property and only 2 offers. One of the offers was from a gym operator, but it was only for part of the building, which made it unsuitable. The second offer was from the Church of Pentecost, who are the applicants in this case.

6.5 The agent considers that there are several reasons why the building is not attractive to business class users, as follows:

1. The configuration, layout and location are not suited to office users, who prefer higher quality premises in the town centre, or on business parks.
 2. The loading options and low eaves height are not suited to Industrial users, who prefer better loading options and much greater eaves height.
 3. There is a considerable supply of offices and industrial space (over 1.63 million sq ft) available within a 2-mile radius of the application site, which means that occupiers can pick and choose premises that best suit their needs.
- 6.6 It should be noted that the proposed change of use will not, in the long-term, result in the loss of employment land, because the building could be converted back to business use if demand and market needs changed in the future. Furthermore, the rear half of the building will remain in commercial use in the form of 4 small industrial units.
- 6.7 Paragraph 4.3.13 of the local plan recognises that there will be some sites in the CEA, which may not have any long-term prospect of re-use for employment purposes and in these cases, it is preferable for these sites to be used for an alternative commercial use that complements the area, than for it to be vacant in the long-term. In this case, the property has been out of business use for 6 years, since it was first occupied by SARA charity in May 2015. The existing use employs 3 part-time staff on site. Hicks Baker have marketed the building for the last 2 years and received no interest from commercial occupiers. Clearly, if the building were suitable for employment purpose, it would have attracted an office or industrial user. However, for the reasons suggested by the agent, and listed above, it is not suited to modern commercial use. It should be noted in the marketing report, that the only other offer for the property was from a gym operator, which could be classified as "an alternative commercial use that complements the area", but they only wanted to rent part of the building, which made them unsuitable tenants. The only user to make an offer for the whole building, after 2 years of marketing, is the applicant, the Church of Pentecost, a charitable organisation.
- 6.8 As stated in the proposal section above, the church will employ a number of staff on the site, including a minister and several support workers. Once Zumba classes and other services are set up, these uses will generate further employment opportunities. It should also be noted that the church will offer

services to the local community, which will significantly enhance peoples mental and physical health, as well as their general well-being. These types of services will be particularly important, as the country emerges from lockdown after the Covid-19 pandemic.

6.9 Policy OU1 states that proposals for new and improved community facilities, such as places of worship, will be acceptable, particularly where a range of facilities can be located on one site, as in this case. New community facilities should be located where there is a choice of means of travel, including walking and cycling. The application site is highly accessible, by multiple travel modes, as explained in the Transport Statement.

6.10 Paragraph 4.7.1 states that quality of life for the residents of Reading is one of the key elements of the vision for the Borough. This proposal will provide important community and social facilities that will be of benefit to local residents and will help to improve physical and mental health and well-being for many people, at a difficult time in world history.

6.11 Consequently, it is considered that the principle of the proposed change of use from class E to Class F1 is acceptable, as the existing building is no longer fit for its original purpose and there is a significant supply of more suitable business accommodation within 2 miles of the site. Furthermore, the proposed use by the church will generate a number of jobs, while offering valuable services to the local community, which will be beneficial for the personal health and well-being of local residents.

ii) Access and Parking

6.12 Policy TR1 states that all development proposals should make appropriate provision to ensure an adequate level of accessibility and safety by all modes of transport. The application is accompanied by a Transport Statement and Travel Plan, which confirm that the proposal will comply with the council's transport strategy and policy TR1, in that the site lies close to several bus routes and can easily be accessed by cycle and foot.

6.13 Policy TR3 states that all development proposals will be considered in relation to their effect on safety, congestion and the environment. In this case, the existing access points will continue to be used, which will not have a material impact on highway safety. The proposed use will be a modest generator of traffic

movements on weekdays, with the largest number of movements being on Sundays, when the road network is less busy. This means that the impact of the proposal on road congestion will not be harmful. Furthermore, as set out in the travel plan, measures will be taken to discourage private car use and encourage the use of public transport, walking and cycling. In addition, the church owns a mini-bus that will be used to transport some parishioners to services. Everything possible will be done to minimise the impact of the proposal on the environment. Consequently, the proposal will comply with policy TR3.

- 6.14 Policy TR4 states that developments will be expected to make full use of opportunities to improve access for cyclists to and from the property. The site lies in a relatively flat part of Reading and there are cycleways, including National Cycle Network (NCN) route 23, passing close to the property. Therefore, the premises can easily be accessed by cycle in compliance with policy TR4.
- 6.15 Policy TR5 states that development should provide car and cycle parking that is appropriate to the location of the site in relation to alternative travel modes, including public transport. As stated in the transport statement, the site is highly accessible by public transport, cycle and on foot. There are 8 car parking spaces on site (including 3 disabled spaces), which will be allocated to the church. The church also owns a mini-bus, which will be parked at the drivers home address for most of the time. Furthermore, the church has agreed to lease 10 parking spaces from the Madejski Stadium, for times of peak demand (Sunday's). Therefore, it is considered that the amount of available car parking is sufficient to meet the needs of the church. In addition, 16 cycle parking spaces will be provided, which is also considered to be an appropriate level of provision. Please note that the church does not propose to provide any EV charging points at this time. However, this may be a consideration in the future, if there is sufficient demand. At the current time, it is considered that the proposed use would not generate enough demand for an EV charging point. Consequently, it is considered that the proposed levels of car and cycle parking are adequate for the proposed use and policy TR5 is complied with.

7. CONCLUSIONS

- 7.1 The proposed change of use from use class E (offices) to use class F1 (place of worship) is considered to be acceptable in principle, because, although the site lies in a Core Employment Area, it is no longer fit for purpose and despite a high level of marketing, over a period of nearly 2 years, no suitable business users have expressed any interest.
- 7.2 Although the proposed use is not a commercial one, it will generate a number of full-time and part-time jobs, as well as providing a range of services that will be extremely valuable to the local community in terms of improving people's health and general well-being.
- 7.3 Safe access will be provided, as well as adequate levels of car parking (both on-site and off-site) and cycle parking in a highly accessible location, with several bus services and cycleways nearby. In addition, the church owns a mini-bus. A travel plan is submitted by the applicants, a registered charity, which will ensure that traffic levels and environmental impacts will be minimised.
- 7.4 Overall, the proposal is acceptable in planning policy terms and planning permission should be Granted as expeditiously as possible.