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Planning, Design & Access Statement

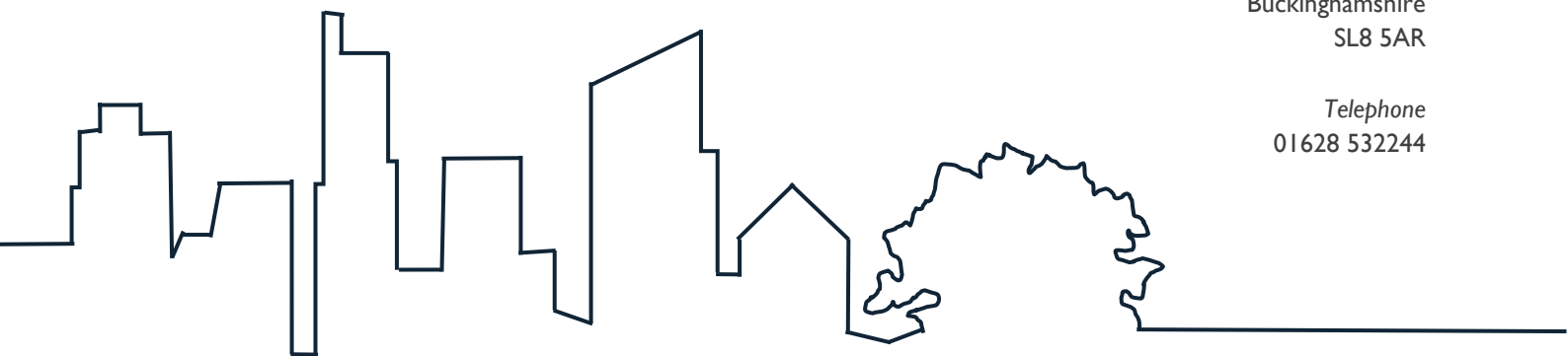
60 Christchurch Road
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I INTRODUCTION

- 1.1 This Statement has been prepared by Walsingham Planning to support a planning application at 60 Christchurch Road, Reading for the change of use of the vacant former Class A1 dry cleaners on the ground floor to a Class A3 café/restaurant; changes to the shopfront and the introduction of kitchen extract equipment on the rear roof.
- 1.2 This Statement considers the site, surroundings, documents the site's planning history and assesses the proposals against the relevant local planning policy and the National Planning Policy Framework. A Design and Access Statement is included.
- 1.3 It is concluded that the proposals would support the function of the Christchurch Road Local Centre by sustaining and enhancing its vitality and viability, which is the objective of local and national policies and would be suitable in all over respects. A recommendation for approval is therefore appropriate.

2 SITE AND SUROUNDINGS

- 2.1 The application property is a part single, part two and part three-storey end of terrace building on the south side of Christchurch Road (A327). The ground floor of the building was previously used as a Class A1 dry cleaners but has been largely vacant since 2014, with only the rear of the premises being used within this use. The upper floors comprise of residential accommodation.



North and west elevations of 60 Christchurch Road, Reading

- 2.2 The unit is located within Christchurch Road Local Centre, a small linear Local Centre comprising a mixture of 15 commercial units on the south side only of Christchurch Road. The Centre is approximately 1km southeast of Reading Town Centre. The Reading University campus is approximately 200m to the east.
- 2.3 Short stay on-street parking is available along Christchurch Road in front of the commercial units and on nearby side streets to serve the Centre.



Christchurch Road Local Centre



Location Plan

- 2.4 The property is not listed and does not lie within a conservation area. It is not located within a floodplain.

Relevant Planning History

- 2.5 Planning permission (ref: 020504) was approved in 2002 for the erection of single storey extension at the rear of 60 Christchurch Road to form a storage area for laundry.
- 2.6 In 2017, planning permission was granted (ref: 170254) for a single storey rear extension to 60 Christchurch Road (albeit the application appears to incorrectly refers to 62a Christchurch Road). This permission has now been implemented.
- 2.7 In October 2017, a Prior Approval application (ref: 171491) was withdrawn for the change of use of 60 Christchurch Road from Class A1 to Class A3 under Class C, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.
- 2.8 In February 2019, planning application ref: 181571 was refused for the change of use of the ground floor of 60 Christchurch Road from Class A1 to a Class A3 café/restaurant, a new shopfront and a part single, part two-storey rear extension. The reasons for refusal were as follows:
- 1 *The proposed change of use would not maintain the vitality and viability of this local centre, due to the loss of an A1 shop unit, and would have a detrimental effect on the diversity of the centre contrary to Adopted Core Strategy Policy CS27 and Sites and Detailed Policies Document Policy DM13.*
 - 2 *No assessment has been provided of the likelihood of odours and proposals to ensure that odour nuisance will be prevented. Therefore the proposed scheme could lead to odour nuisance which would have a detrimental effect on residential amenity contrary to Adopted Sites and Detailed Policies Document Policy DM4.*
 - 3 *The proposed bin storage is considered to be insufficient in size to serve both the needs of the proposed mixed commercial and residential development and its layout is unsatisfactory with the storage for commercial and residential uses being combined. This would not comply with Adopted Core Strategy Policy CS2 and the Council's Waste*

Management Guidelines. Insufficient space for waste is also likely to lead to detrimental effects on amenity with respect to odour, contrary to Adopted Sites and Detailed Policies Policy DM4.

- 2.9 The proposals received no objection from the Council's Environmental Health Team subject to recommended conditions being attached to any forthcoming planning permission. The proposals also received no objection from the Council's Transport Team following the submission of further information on parking from the applicant (see Appendix 1). 14 responses from local residents were received, including a petition signed by 34 people against the proposals.
- 2.10 The refusal was upheld at appeal. The Inspector gave the emerging change of use policies within the now adopted Local Plan limited weight and therefore dismissed the appeal on reason for refusal 1 alone. The Inspector was of the opinion that there could be outstanding objections to the emerging policies and these policies could have therefore changed prior to being formally adopted. The Inspector agreed that both odour (reason for refusal 2) and waste (reason for refusal 3) could be dealt with via condition.
- 2.11 Planning application ref: 190760 was submitted in May 2019 for development including the change of use of part of the ground floor from Class A2 (bank) to Class A5 (takeaway) at 76 Christchurch Road, Reading. It is understood that the application is due to be determined at committee on 13 November.

3 THE PROPOSAL (DESIGN & ACCESS)

- 3.1 Similar to planning application ref: 181571, it is proposed to change the use of the existing ground floor unit from Class A1 to a Class A3 café/restaurant. The unit would sell hot and cold drinks and food and include customer seating.
- 3.2 The proposed café/restaurant would benefit from a new shopfront, as shown on the proposed elevations drawing, and a new internal bin store within the rear extension. Two customer WCs (including one disabled) would also be provided.
- 3.3 New mechanical services equipment will be required to support the Class A3 use and its proposed location to the rear of the first floor flat roof is shown on the proposed first floor plan.
- 3.4 The end user of the ground floor is not yet known, albeit it is expected to be Costa Coffee style. Interested parties will not commit to a lease until they have the security of planning permission being granted for change of use. The applicant is therefore unable to confirm the mechanical services to be installed, if any, but has undertaken an acoustic assessment to set noise limits in accordance with the necessary guidance.
- 3.5 The unit's town centre location ensures easy access for a wide customer base by foot, by bicycle and on public transport. There is short stay car parking, including dedicated disabled bays, and a bus stop located immediately to the west of the unit, as well as further car parking in the surrounding streets.
- 3.6 Access to the unit will be via a level access from a well-maintained walkway. The café's layout will be carefully considered in order to accommodate the needs of those who have a physical impairment. A disabled toilet is provided at ground floor level.
- 3.7 Unlike application ref: 181571, the application does not propose a part single, part two-storey rear extension. This has already been implemented in accordance with planning permission ref: 170254.

4 PLANNING POLICY & GOVERNMENT GUIDANCE

The Development Plan

- 4.1 Section 38(6) of Planning and Compulsory Purchase Act 2004 states that applications for planning permission should be determined in accordance with the development plan, unless material considerations (including the NPPF) indicate otherwise.
- 4.2 In this case, Reading Borough Council's development plan has changed since application 181571. It now comprises the newly adopted Local Plan (November, 2019). This has replaced the Core Strategy (2008), Sites and Detailed Policies Document (2012) and Central Area Action Plan which application 181571 was previously assessed against.
- 4.3 The unit continues to form part of the Key Frontage of the Christchurch Road Local Centre. Those relevant policies are summarised below.
- 4.4 Policy CC1 places a presumption in favour of sustainable development. It states that development which conflicts with the development plan will be refused, unless other material considerations indicate otherwise.
- 4.5 Policy CC5 requires development to minimise the generation of waste and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate space to facilitate waste storage, reuse, recycling and composting.
- 4.6 Policy CC6 promotes accessible development.
- 4.7 Policy CC8 seeks to protect the amenity of existing and new residential properties.
- 4.8 Policy EN17 requires noise generating equipment to be at least 10dBA below the existing background level as measured at the nearest noise sensitive receptor.
- 4.9 Policy TR3 requires development to consider traffic generation, highway safety and accessibility.

- 4.10 Policy RL1 requires the vitality and viability of Local Centres to be maintained and enhanced.
- 4.11 Policy RL3 states that within Christchurch Road Key Frontage, loss of A1 retail or A2 financial and professional to other 'centre uses' will only be permitted where:
- There would be no more than 3 consecutive units which are not in A1 or A2 retail use; and
 - The proportion of the total length of the Key Frontage within the centre that is in A1 or A2 use would exceed 60%.
 - There would be no more than 2 consecutive A5 takeaways, and no more than 30% of the length of the Key Frontage would be in takeaway use;
 - There would be no net loss of 'centre uses' for 'non-centre uses' at the ground floor (apart from entrances to upper floors) except in exceptional circumstances;
 - Within local centres, all new development should provide some 'centre uses' at the ground floor, unless it can be clearly demonstrated that this would not be possible or appropriate.
- 4.12 Policy OU5 requires shopfronts to respect the character of the building and their surroundings.

National Planning Policy Framework

- 4.13 The National Planning Policy Framework (NPPF) was first published in March 2012 with the aim of making the planning system less complex and more accessible. A revised version of the NPPF (NPPF 2) was published in July 2018 and minor amendments were incorporated in February 2019. NPPF 2 is supplemented by the (ever evolving) Planning Practice Guidance (NPPG), first published in March 2014. These replace the much more detailed policy and guidance contained in the suite of Planning Policy Statement documents and elsewhere.
- 4.14 Part 7 requires planning policies and decisions to take a positive approach to town centre (which includes local centres) growth, management and adaptation in order to ensure their vitality. They should be allowed to diversify, with a suitable mix of uses, in a way that can respond to rapid changes in the retail and leisure industries.

- 4.15 The NPPF states that local planning authorities should approach decision-taking in a positive way to foster the delivery of sustainable development, working proactively with applicants, looking for solutions rather than problems and seeking to approve applications for sustainable development where possible.

5 PLANNING ASSESSMENT

Principle of Ground Floor Change of Use

- 5.1 It is proposed to change the use of the vacant ground floor of 60 Christchurch Road from use Class A1 to use Class A3 café/restaurant. The National Planning Policy Framework (NPPF) promotes sustainable economic development through focussing a mix of main town centre uses in existing centres. The document places substantial weight on re-using sustainably located buildings and land, securing economic growth and creating jobs and prosperity through the planning system. The proposed development would support these aims by adding an attractive new café/restaurant to Christchurch Road Local Centre and providing local employment. This is exactly the type of development that the Council should be supporting in light of the NPPF and Policy CC1.
- 5.2 As the unit is located within Christchurch Road Local Centre's Key Frontage and a change of use away from Class A1 is proposed, the tests within the newly adopted Policy RL3 apply.
- 5.3 Policy RL3 states that the loss of A1 retail within Christchurch Road Local Centre will be permitted where:
- 1) There would be no more than 3 consecutive units which are not in A1 or A2 retail use;
 - 2) The proportion of the total length of the Key Frontage within the centre that is in A1 or A2 use would exceed 60%.
 - 3) There would be no more than 2 consecutive A5 takeaways, and no more than 30% of the length of the Key Frontage would be in takeaway use;
 - 4) There would be no net loss of 'centre uses' for 'non-centre uses' at the ground floor (apart from entrances to upper floors) except in exceptional circumstances;
 - 5) Within local centres, all new development should provide some 'centre uses' at the ground floor, unless it can be clearly demonstrated that this would not be possible or appropriate.
 - 6) Where the Key Frontages within a centre as identified on the Proposals Map are proposed to significantly change, or have already significantly changed, as a result of redevelopment, meaning that criteria 1 and 2 cannot

be applied, proposals should ensure that a strong retail character is retained within the ground floor of the centre, and that ground floor concentrations of consecutive units not in A1 or A2 use, in particular A5 takeaways, are avoided.

These six tests will be considered in turn.

Test 1

- 5.4 The proposal is a non-A1 use which would result in three consecutive non-A1 or A2 units (not more). It would therefore be fully compliant with the first test of Policy RL3.

Test 2

- 5.5 In terms of Test 2 and the proportion of the total length of the Key Frontage units, it is unclear how this should be measured: by the number of units in the frontage or the actual length of each shopfront. The below retail survey therefore considers the impact of the change of use on both.
- 5.6 Based on the below calculations, the proposed development comfortably meets this 60% target, with both 69% of the units remaining in A1 or A2 use and 72% of the frontage length remaining in A1 or A2 use. The proposal is therefore compliant with the second test. This would remain the case if application ref: 190760 is granted planning permission, with 62% of the units remaining in A1 or A2 use and 64% of the frontage length remaining in A1 or A2 use.

Address	Description	Authorised Use Class	Length of Frontage
56 Christchurch Road	Vacant	A1	7.2m
60 Christchurch Road	Vacant	A1 to A3	4.9m
62 Christchurch Road	Sizzling Spice	A3	5.4m
64 Christchurch Road	Domino's	A5	5.2m
66 Christchurch Road	Adams	A2	5.2m
68 Christchurch Road	Lloyds Pharmacy	A1	5.1m
70 Christchurch Road	Costcutter	A1	5.3m
72-74 Christchurch Road	Today's Local	A1	12.4m
76 Christchurch Road	Vacant	A2	6.1m
78 Christchurch Road	Cintra Estates	A2	5.9m
80 Christchurch Road	Café Metro	A3	6m
82 Christchurch Road	Greggs	A1	3.9m
84 Christchurch Road	Barbers	A1	3.8m
Total length of frontage			76.4m
Existing A1/A2 units		10 out of 13 (77%)	59.8m (78%)
Proposed A1/A2 units		9 out of 13 (69%)	54.9m (72%)
Proposed A1/A2 units should application ref: 190760 be approved		8 out of 13 (62%)	48.8m (64%)

*2019 Retail Survey*Test 3

- 5.7 The proposal is for a Class A3 use, not a Class A5 takeaway. There would therefore be no increase in the length of the Key Frontage for takeaway uses. The proposal therefore meets the third test of Policy RL3.

Tests 4 and 5

- 5.8 The proposed Class A3 use is a 'centre use'. There would be no loss of centre uses at the ground floor within the Local Centre and the proposal therefore meets the fourth and fifth tests of Policy R3.

Test 6

- 5.9 There are no proposals for the local centre to significantly change and the centre has not already significantly changed as a result of development such that tests 1 and 2 cannot be applied. The sixth test of Policy R3 therefore does not apply to the proposals
- 5.10 The proposed change of use is therefore fully compliant with Policy RL3. This was acknowledged by the Council during the appeal. The proposed change of use would also remain fully compliant with RL3 should planning application ref: 190760 be approved.
- 5.11 The NPPF also provides a clear steer from Government that flexibility and a mix of town centre uses should be allowed. The NPPF and more flexible Permitted Development Rights between use classes A1 and A3 show a clear direction of travel at a national level, with the Government acknowledging the challenges that the high street and shopping centres are facing. They encourage diversification.
- 5.12 A substantial A1 and A2 presence would remain as a result of the proposed change of use and it would not lead to an over intensification of non-A1 or A2 uses or undermine the Centre's retail function. This was acknowledged by the Inspector at the appeal.
- 5.13 The change of use is fully in accordance with the Council's very recently adopted Policy RL3 which recognises and reflects the flexibility encouraged within the NPPF and changes to Permitted Development Rights. On this basis, planning permission should be granted.
- 5.14 The proposed new café/restaurant would enhance the vitality and viability of the Local Centre and have a complementary relationship with other shops and services in accordance with Policy RL1. It would increase dwell time and footfall and encourage

linked spending to the benefit of the remaining Class A1 units and other town centre uses. Cafes and restaurants are now regarded as part of the usual town centre amenities used by visitors, shoppers, residents and local workers and can contribute more to the vitality and viability of a centre than many retailers. They encourage people to spend their time and money in shopping centres instead of other out of town or online spending outlets.

- 5.15 The NPPF and policies RL1 and RL3 recognise the need to provide customer choice and a diverse retail offer to ensure a healthy centre and cater for all complementary town centre uses and not just pure retail uses. A choice of café/restaurants is just as important as a choice of shops. In this respect, the proposal will therefore improve the Centre's shopping range, quality and function in accordance. As with a Class A1 use, it would provide an active shopfront.
- 5.16 Cafes and restaurants should be recognised for the positive role that they play in centres and differentiating the shopping experience, with their opportunities for social interaction, from online shopping. The NPPF and Local Plan recognise the importance of a sense of community within centres and cafes and restaurants offer an opportunity for people to meet.
- 5.17 The benefits of the proposed change of use are significant: bringing a vacant unit back into gainful use; a new shopfront (in accordance with Policy OU5); provision of local employment; an active frontage; financial investment in the premises; customer attraction; establishment of a popular use which will bring linked benefits to other centre operators; improved customer choice; and long term viability of the unit. The proposed use would bring considerable benefits to the Local Centre in accordance with the provisions of the NPPF. The NPPF places significant weight on economic development and a presumption in favour of sustainable development. It would support economic development, reuse land that has been previously developed and create jobs and prosperity.



Existing shopfront to be replaced

Access and Parking

- 5.18 The unit's local centre location ensures easy access on foot, by bicycle and on public transport for both staff and customers in accordance with Policy CC6 and TR3. Access is via a new level entrance and facilities. No allocated parking is currently associated with the site and existing parking arrangements will remain unchanged. There is on-street car parking within walking distance of the unit. Beyond this the surrounding road network has extensive parking restrictions preventing illegal parking.
- 5.19 It is noted that there were third party representations during the course of application ref: 181571 and the appeal from Whitley Park Lane residents relating to the general use of the existing authorised service road to the rear of the local centre. 60 Christchurch Road would not use this service road as it has no access to it. Refuse collection and deliveries for the previous use were from Christchurch Road and this will continue to be the case. The proposals would not therefore affect the service road.

- 5.20 Following correspondence with the Council's Transport Officer and the provision of appeal examples as part of planning application ref: 181571, it was accepted that:

"...given the small size of the unit there would not be an increase in demand in parking. ... As such in this instance we would not have a case to refuse this permission. I therefore have no objections to the proposed change of use."

- 5.21 The proposed use would have no adverse impact on the safety and convenience of the highway in accordance with Policy TR3.

Waste

- 5.22 Refuse and recycling for the new use would be stored internally within the ground floor extension and collected by a private contractor. The extended ground floor unit is generously sized such that there would be adequate space to store waste internally until the time of collection.

- 5.23 As food waste will be generated, the applicant will arrange for collection on a daily basis. Town/city centre units often have this arrangement and there is no reason why it cannot be adopted here. This approach is also in compliance with the Council's Waste Management Guidance document which recognises that more frequent waste collections for commercial uses which produce food waste are a better solution:

"Collection frequencies for commercial waste will be dependent on the space available, the amount of waste being generated and the particular contractual arrangements... where commercial units will be producing food waste, developers should be aware of the increased likelihood of odours... Premises which generate a significant quantity of waste may also benefit from a more frequent collection to reduce the need for storage space."

- 5.24 A daily collection would therefore be appropriate and satisfactorily serve the needs of the Class A3 unit. By avoiding the need to store waste and recycling externally, there would be no potential odour or nuisance impact and no detrimental effects on residential amenity in accordance with Policy CC8.

- 5.25 The proposed use makes adequate provision for waste in accordance with policies CC5 and the Inspector at the appeal was satisfied that this was the case. If felt necessary, a planning condition could be imposed to provide full details with respect to how refuse/waste would be stored at the property and the intended collection arrangements.

Noise

- 5.26 New ventilation and extract equipment will likely be required to support the new use. Plant is not proposed to operate overnight.
- 5.27 An acoustic assessment has been carried out to measure any potential impact. The end user of the ground floor is not yet known, albeit it is expected to be Costa Coffee style. The applicant is therefore unable to confirm the mechanical services to be installed, if any, but has undertaken the acoustic assessment to set noise limits in accordance with the necessary guidance.
- 5.28 The acoustic assessment confirms that, providing its recommendations are followed, the equipment can accord with the requirements of Reading Borough Council and it will not be detrimental to the amenity of nearby noise sensitive properties in accordance with policies EN17 and CC8. The equipment will be sensitively located to the rear of the first floor roof facing away from the building, the same as existing plant equipment serving the neighbouring ground floor units. It would not be visible from the streetscene.
- 5.29 A condition stating the target noise limit as 36dB was considered appropriate by the Reading Borough Council's Environmental Health Officer (EHO) as part of the previously refused application.
- 5.30 The proposed opening hours are 07:00 to 23:00 Monday to Sunday, consistent with opening hours of existing neighbouring ground floor uses.



Extract equipment on neighbouring rear flat roof

Odour

- 5.31 Potential odour nuisance formed reason for refusal 1 of application ref: 181571. As previously stated, the end user of the ground floor is not yet known as interested parties will not commit to a lease until they have the security of planning permission being granted for the change of use. The applicant is therefore unable to confirm the food which will be cooked and the mechanical services to be installed to produce a detailed odour assessment. However, it is likely to be a Costa Coffee type style establishment. There is expected to be limited primary cooking at the appeal premises and the type of food and cooking is therefore expected to be easily managed and achievable from an odour perspective.
- 5.32 Irrespective of the type of cooking to take place, during the course of the previously refused application, the Council's EHO confirmed that a condition could be attached to any forthcoming consent requiring an odour assessment to be submitted and approved by the LPA when the required plant, if any, is known. The applicant would accept such a condition. The Inspector also agreed that a planning condition could be applied to satisfactorily guard against the potential for odour nuisance to occur in order to overcome reason for refusal 2.
- 5.33 An appropriately worded pre-use condition requiring an odour assessment to be produced and details of the required odour mitigation equipment to be submitted and approved by the LPA prior to installation would therefore prevent any unacceptable

odour nuisance and protect neighbouring residential amenity in accordance with Policy CC8.

- 5.34 The NPPF emphasises that the presumption in favour of sustainable development should be at the heart of plan-making and decision-taking which means that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF as a whole. Significant weight should be placed on developments such as this which have brought investment and created new job opportunities.

6 CONCLUSION

- 6.1 Planning permission is sought for the change of use of a vacant Class A1 unit to provide a Class A3 café/restaurant, a new shopfront and plant equipment.
- 6.2 The change of use would be entirely in accordance with Policy RL3 of the newly adopted Local Plan.
- 6.3 The appeal in relation to the 2018 application was upheld on reason for refusal 1 alone. As a result of the adoption of the new Local Plan and Policy RL3, reason for refusal 1 no longer applies. Accordingly, planning permission should now be granted.
- 6.4 The Inspector agreed that both odour (reason for refusal 2) and waste (reason for refusal 3) could be satisfactorily controlled by planning conditions.
- 6.5 The proposed use would therefore have no adverse impact on amenity.
- 6.6 The proposals comply with the appropriate provisions of the Development Plan and the NPPF and a recommendation for approval is therefore appropriate.