



Over **30 years** of success and still planning

WALSINGHAM PLANNING

SPECIALIST PLANNING & DEVELOPMENT CONSULTANTS

Planning, Design & Access Statement

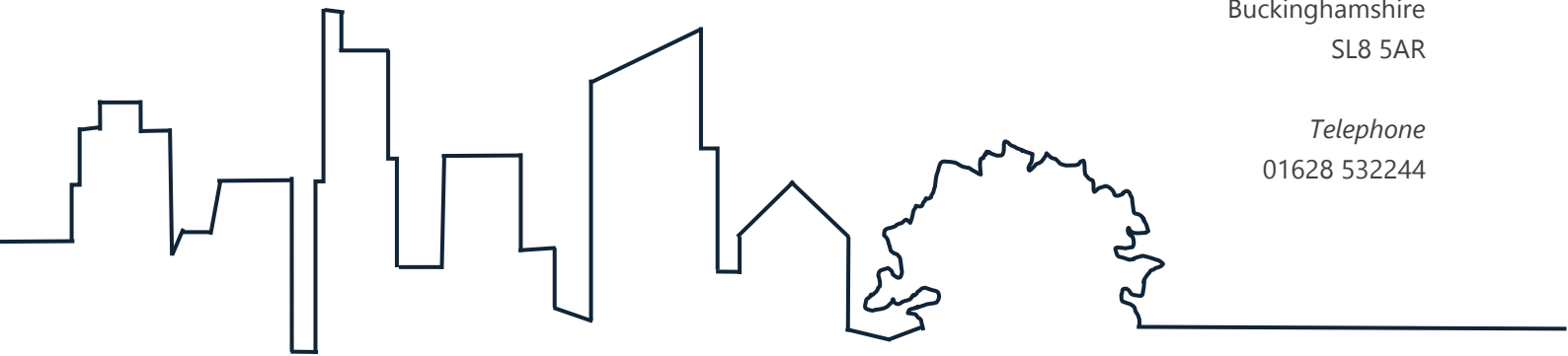
60 Christchurch Road
Reading
RG2 7AZ

SEPTEMBER 2018

Walsingham Planning

Bourne House
Cores End Road
Bourne End
Buckinghamshire
SL8 5AR

Telephone
01628 532244



bourne.end@walsingplan.co.uk
www.walsinghamplanning.co.uk

1 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; a part single, part two-storey rear extension; changes to shopfront and the introduction of kitchen extract equipment on rear roof.
- 1.2 This Statement considers the site, surroundings, document the site's planning history and assesses the proposals against the relevant 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 is therefore appropriate.

2 SITE AND SUROUNDINGS

- 2.1 The application property is a part two, 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. The upper floors comprise of a single self-contained flat.



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

- 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).
- 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.

3 THE PROPOSAL (DESIGN & ACCESS)

- 3.1 It is proposed to change the use of the existing ground floor unit (65sqm) 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 A part single, part two-storey rear extension is also proposed. The 12.8m deep single storey ground floor extension would provide 70sqm of additional floorspace and has previously been permitted under application ref: 170254. The permission is yet to be implemented. The additional space would support the new use.
- 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.
- 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 This application also includes a modest 3.3m deep extension to the rear of the first floor to provide additional living space for the self-contained flat, the extent of which has been based on other properties within the terrace.

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 comprises the Core Strategy (2008), Sites and Detailed Policies Document (2012) and Central Area Action Plan. The Council is at an advanced submission stage in producing a new Local Plan which will replace these documents. The Plan has been submitted for examination with hearings commencing on 25 September 2018.
- 4.3 The unit forms part of the Key Frontage of the Christchurch Road Local Centre. This remains the case in the emerging Local Plan. Relevant policies are summarised below.
- 4.4 Policy CS5 promotes accessible buildings to all potential users.
- 4.5 Policy CS7 requires development to maintain and enhance the character and appearance of the area in which it is located.
- 4.6 Policy CS24 states that maximum parking standards will be applied in relation to the accessibility of locations to sustainable transport facilities, particularly public transport.
- 4.7 Policy CS26 aims to maintain and enhance the vitality and viability of local centres. This includes widening the range of uses.
- 4.8 Policy CS27 seeks to maintain a strong retail character in the centres. Significant groupings of non-retail uses in one part of a centre will not be allowed. The Policy acknowledges that other uses play a valuable role. It targets 50% of A1, A2, A3, A4, A5 and sui generis units within each centre to be in A1 use.

- 4.9 Policy SD1 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.
- 4.10 Policy DM4 seeks to protect the amenity of existing and new residential properties.
- 4.11 Policy DM9 requires extensions to houses to respect the character of the existing house and pattern of neighbouring properties.
- 4.12 Policy DM10 states that flats may be provided with communal outdoor space.
- 4.13 Policy DM11 seeks to resist inappropriate development of residential gardens.
- 4.14 Policy DM12 requires development to take into account traffic generation, highway safety and accessibility.
- 4.15 Policy DM13 seeks to ensure that a diverse range of services are available within each centre, but that a strong retail element is maintained. Within the Christchurch Road Key Frontage, loss of A1 retail will only be permitted where:
- 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;
 - There would be no more than 3 consecutive units which are not in A1 retail use; and
 - The proportion of the total length of the Key Frontage that is in A1 retail use would exceed 50%.
- 4.16 Emerging Policy RL3 of the new Local Plan has the same objectives as Policy DM13 but recognises the need to adapt the policy for smaller centres in order to be consistent with the NPPF and the wide range of changes of use that can take place under permitted development rights without needing planning permission. Within Christchurch Road Key Frontage, loss of A1 retail will only be permitted where:
- 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;
- 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%.

National Planning Policy Framework

- 4.17 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 was published in July 2018.
- 4.18 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. Residential development is also encouraged as it is judged to play an important role in ensuring the vitality of centres.
- 4.19 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 SD1.
- 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 emerging Policy RL3 apply. Even though this is yet to be adopted, the new Local Plan is at an advanced submission stage and Policy RL3 is up-to-date with national objectives and can be afforded great weight. In contrast, adopted policies DM13 and CS27 (which are to be replaced by RL3) are not consistent with national objectives and can only be afforded limited weight.
- 5.3 Policy RL3 states that the loss of A1 retail within Christchurch Road Local Centre will only be permitted where:
- 1) 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;
 - 2) 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;
 - 3) There would be no more than 3 consecutive units which are not in A1 or A2 use; and
 - 4) The proportion of the total length of the Key Frontage within the centre that is in A1 or A2 use would exceed 60%.

These four tests will be considered in turn.

Test 1

- 5.4 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 first test of Policy RL3.

Test 2

- 5.5 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 second test of Policy R3.

Test 3

- 5.6 The proposal is a non-A1 use which would result in three consecutive non-A1 or A2 units. It would therefore be fully compliant with the third test of Policy RL3.

Test 4

- 5.7 In terms of Test 4 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.
- 5.8 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 fourth test.
- 5.9 The proposed change of use is fully compliant with Policy RL3

Address	Description	Authorised Use Class	Length of Frontage
56 Christchurch Road	Redserve Heating	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	NatWest	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 units		7 out of 13 (54%)	42.6m (56%)
Proposed A1 units		6 out of 13 (46%)	37.7m (49%)
Existing A1/A2 units		10 out of 13 (77%)	59.8m (78%)
Proposed A1/A2 units		9 out of 13 (69%)	54.9m (72%)

2018 Retail Survey

- 5.10 In terms of assessing the proposals against adopted policies DM13 and CS27, the first two tests are the same and so the proposed change of use continues to meet these.
- 5.11 The third test does not allow for more than three consecutive units to be in non-A1 use. Unlike Policy RL3, it does not group A1 and A2 uses together. The proposed change of use would result in four consecutive non-A1 uses between 60 and 66 Christchurch Road (see above retail survey). It is therefore contrary to the third test of Policy DM13. However, as stated, this policy is out-of-date and should not be given any weight in determining the application. It does not reflect important material considerations which supersede this test of the policy.

- 5.12 The fourth test of Policy DM13 and Policy CS27 do not allow the total length of the Key Frontage that is in A1 use would exceed 50%. Unlike Policy RL3, it does not group A1 and A2 uses together. Based on the above calculations, the proposed change of use will result in the number of units in the frontage and the actual length of the frontage within Class A1 use reducing to slightly below the 50% target (46% and 49% respectively). It is therefore contrary to the fourth test of Policy DM13 and part of Policy CS27. However, as stated, these policies are out-of-date and do not reflect important material considerations which supersede them.
- 5.13 As well as meeting the tests within emerging Policy RL3, there are other material considerations which should be borne in mind when assessing the proposal and which supersede the requirements within policies DM13 and CS27. There have been changes to national planning policy and Permitted Development Rights since the adoption of Policy DM13. These now encourage and allow for a greater mix and flexibility of uses within local centres as a result of the challenges they are facing.
- 5.14 The change between use Classes A1 and A3 already benefits from temporary Permitted Development Rights under Part 4, Class D of the Town and Country Planning (General Permitted Development) Order 2015. This allows the ground floor unit to operate as Class A3 for a period of two years without requiring planning permission. This is the fall-back position for the applicant by which time the emerging policy will likely be adopted.
- 5.15 The second material consideration is that the change of use also benefits from permanent Permitted Development Rights under Part 3, Class C of the Town and Country Planning (General Permitted Development) Order 2015. Due to the proposed café/restaurant requiring ventilation, extraction and waste storage facilities, an application for Prior Approval would be required in order to assess the proposal's impact under this right. However, given extensions and a new shopfront are also proposed, a single planning application which encapsulates all of these elements is considered to be most appropriate.
- 5.16 Both Permitted Development options are material considerations and, along with the NPPF, provide a clear steer from Government that flexibility and a mix of town centre

uses should be allowed. They 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.

- 5.17 In summary, although the change of use is not strictly in accordance with the entirety of policies DM13 or CS27, these policies are now out-of-date. 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. The change of use is fully in accordance with the Council's emerging and up-to-date Policy RL3 which recognises and reflects the greater flexibility encouraged within the NPPF and changes to Permitted Development Rights. On this basis, planning permission should be granted.
- 5.18 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 CS26. 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.
- 5.19 The NPPF and Policy CS26 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.
- 5.20 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 recognises the importance of a sense of community within centres and cafes and restaurants offer an opportunity for people to meet.

- 5.21 The benefits of the proposed change of use are significant: bringing a vacant unit back into gainful use; 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. There are no adverse impacts associated with the proposed use. If any harm is found, there are significant material considerations to indicate otherwise.



Existing shopfront to be replaced

Operational Considerations

- 5.22 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. 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.
- 5.23 The proposed opening hours are 7am to 11pm, consistent with opening hours of existing neighbouring ground floor uses. Refuse and recycling would be stored internally within the ground floor extension and collected by a private contractor. The proposed use would have no adverse impact on the safety and convenience of the highway and makes adequate provision for waste in accordance with policies CS5, CS24 and DM12.
- 5.24 New ventilation and extract equipment will be required to support the new use and an acoustic assessment has therefore been carried out to measure its impact. The 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 Policy DM4. 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.



Extract equipment on neighbouring rear flat roof

Proposed Extensions

- 5.25 A part single, part two-storey rear extension is proposed. The same ground floor extension already has consent under application ref: 170254. The additional ground floor space would support the use of the proposed café. The LPA previously judged the ground floor extension to be of a size commensurate with the importance of the centre. It was acknowledged that neighbouring units had ground floor extensions of a similar length to that proposed and its relatively plain design was appropriate for the commercial nature and character of the site and its surroundings in accordance with policies CS7 and DM9. No neighbouring residential properties were judged to be affected by this development in accordance with Policy DM4. This remains the same.
- 5.26 The location of the ground floor extension is currently covered by weeds and rubbish. It was acknowledged by the Council that this existing amenity space is of poor quality and unused except for the storage of bins. The proposal therefore would not result in the loss of residential amenity space for the first floor flat in accordance with policies DM10 and DM11. Officers previously acknowledged that the occupants have access to nearby Cintra Park.



Proposed location of ground floor extension

- 5.27 This application also includes a modest 3.3m deep first floor rear extension to provide additional living space for the self-contained flat, the extent of which has also been based on other properties within the terrace (68 and 72 Christchurch Road). Similar to the ground floor extension, its design is appropriate for the nature and character of the site and surroundings and it would have no adverse impact on neighbouring properties. It has no adverse impacts and is in accordance with policies CS7, DM4 and DM9.



First floor extension to be in line with existing extensions at 68 and 72 Christchurch Road

- 5.28 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 ground and first floor extension, a new shopfront and plant equipment.
- 6.2 The proposed change of use benefits from temporary and permanent Permitted Development rights which are material considerations and make the existing policy requirements out-of-date. The proposal would be in accordance with Policy RL3 of the new Local Plan.
- 6.3 It is intended to bring the vacant commercial unit back into gainful use within a Local Centre fully in accordance with the aims of the Government, the NPPF and the Council's emerging and up-to-date policies. It creates a diversity of uses in the Local Centre and provides employment opportunities for local people. The use would have no adverse impact on neighbouring uses.
- 6.4 The proposed ground floor extension has already been granted planning permission but is yet to be implemented. The second floor extension is modest and follows the same design principles. Its scale is commensurate with other first floor extensions within the terrace.
- 6.5 The proposals comply with the appropriate provisions of the Development Plan and the NPPF and a recommendation for approval is therefore appropriate.