

Planning and Development
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22 August 2018

Dear Sir/Madam

Town & Country Planning Act 1990 (As Amended)

Ground Floor, 37 Broad Street, Reading, RG1 2AA

Full Planning Application for the Proposed Change of Use from Beauty Treatment Clinic (Sui Generis) to a Travel Agent (Use Class A1) at 37 Broad Street, Reading

We write on behalf of our client, Royal London Asset Management ("RLAM"), in order to submit a full planning application for the proposed change of use of the Ground Floor at 37 Broad Street, from a Beauty Treatment Clinic (Sui Generis) to a Travel Agent (Use Class A1). The application is required to enable the occupation of the existing vacant unit by Thomas Cook and will reinstate an A1 use back into the core shopping area of Reading Central.

The description of development being applied for is as follows:

"Proposed Change of Use from Beauty Treatment Clinic (Sui Generis) to Travel Agent (Use Class A1) at ground floor level of No. 37, Broad Street"

The application, submitted via the Planning Portal (Ref: PP-07225663), comprises of the following documents:

- Site Location Plan
- Site Block Plan

The statutory planning application fee of £462.00 has been paid by Credit Card directly to Reading Council.

Site Description and its Surroundings

The application site relates to the ground floor of No. 37 Broad Street, which measures 124 sqm. The wider building is configured over four levels (including ground and three upper floors). At ground level, the premises was formerly used as a Beauty Treatment Clinic and is now vacant. The upper floors comprise associated storage and staff areas at first floor level and residential properties on the second and third floors.

The property is located on the north side of Broad Street, which is fully pedestrianised, and is within close proximity to the Oracle Shopping Centre, which lies 200m to the south. Furthermore, the site is within the Reading Central Area and Primary Shopping Area as defined by Reading's Core Strategy and the Central Area Action Plan. It should also be noted that the subject building (No. 37) is part of a Grade II terrace of listed buildings.

Relevant Planning History

A review of Reading Council's online planning records has been undertaken. The site has been subject to a change of use and internal/external alterations. Relevant applications pertaining to the site are detailed in the table below:

Reference	Proposal	Decision
152080/FUL	Proposed change of use from A1 retail to a Sui Generis Beauty Treatment (including laser hair removal)	Approved – Feb 2016
152111/LBC	Proposed internal alterations and signage	Approved – Feb 2016
152081/ADV	Proposed fascia and projecting signs	Approved – Feb 2016

The planning history summary confirms that the former use of the ground floor at No.37 was Use Class A1, meaning that the principle for an A1 use has already been accepted by the Council.

Planning Policy

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. The application site falls within the administrative boundary of Reading Council and in this instance the Development Plan consists of:

- Core Strategy (adopted January 2008, altered January 2015)
- Site and Detailed Policies (adopted October 2012, altered January 2015)
- Reading Central Area Action Plan and Proposals Map (adopted 2009)

In addition to the Development Plan, the following policy documents and guidance are material considerations in the determination of this application:

- National Planning Policy Framework (NPPF) (adopted 2012, revised 2018)
- National Planning Practice Guidance (NPPG) (adopted 2014)
- Emerging New Local Plan (Submission Version)

Core Strategy (adopted January 2008, altered January 2015)

Reading Central, within which the subject property is located, is identified as a 'Regional Centre' by Core Strategy Policy CS26 'Network and Hierarchy of Centres'. In the first instance, Policy CS26 states that, *"the vitality and viability of these centres should be maintained and enhanced."* It also states that development for main town centre uses (including those within Use Class A1) should be of an appropriate scale.

Core Strategy Policy CS27 'Maintaining the Retail Character of Centres' seeks to ensure that a strong retail character will be maintained in the centres identified as being part of the network. In achieving this, it states that, *"significant groupings of non-retail uses in one part of a centre will not be allowed."* Paragraph 8.17 also recognises that retail uses form the main contributor to the vitality and viability of these centres.

Reading Central Area Action Plan and Proposals Map (adopted 2009)

The application site is located within Reading's Central Area, which is designated by RCAAP Policy RC6. Paragraphs 8.8-8.10 of the RCAAP comprises the supporting text to Policy RC6. Paragraph 8.8 notes that Reading's Retail and Leisure Study identifies a substantial need for additional retail floorspace in such locations and the Core Strategy notes that retail floorspace, *"should primarily be directed towards the centre of Reading."* Paragraph 8.9 is also relevant and states that within Reading's Central Area, *"the general retail character should be maintained and it should be the focus for new retail investment."*

More specifically, the subject property is located within the 'Primary Shopping Area', identified as Reading's 'Shopping Core', which is also designated by RCAAP Policy RC6. It provides a definition of this location and states that, *"Retail development will take place in the Primary Shopping Area, as defined on the Proposals Map."*

Both sides of Broad Street are also identified as 'Existing Active Frontages'. Policy RC10 is therefore relevant, which states that, *"Uses on the ground floor along the designated active frontages (illustrated on the Proposals Map and in Figure 8.1) will be within one of the following use classes: A1, A2, A3, A4, A5, C1, D1, D2 or related sui generis uses."*

Material Considerations

National Planning Policy Framework (NPPF) (adopted 2012, revised 2018)

The National Planning Policy Framework was introduced by the Government in March 2012. A new version was published in July 2018, becoming the current adopted Framework. Similar to the 2012 NPPF, the new version keeps at its heart a *"presumption in favour of sustainable development"*.

The Framework, taken as a whole, represents the Government's definition of what constitutes a sustainable development. This definition of sustainable development includes three key roles: an economic role; a social role; and an environmental role. These aims are mutually dependent and should be sought jointly and simultaneously by the planning system.

Paragraph 11 of the NPPF applies a presumption in favour of sustainable development, which should be seen as a golden thread running through plan-making and decision-taking, and notes that for decision-taking this means:

- *"Approving development proposals that accord with the development plan without delay; and*
- *Where the development plan is absent, silent, or relevant policies are out-of-date, granting permission unless:*
 - *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

Paragraph 85 of the NPPF states that, *"Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation."*

The emerging New Local Plan (NLP) (Submission Version)

The Council is in the process of producing its New Local Plan which, when adopted, will replace the current development plans (including the Core Strategy, Reading Central Area Action Plan and Sites and Detailed Policies Document), which will set out how Reading will develop up to 2036.

The New Local Plan is at an advanced stage, having already been through three rounds of public consultation on the Issues and Options Version, the Draft Local Plan Version, and the Pre-Submission Draft Version. The Submission Version of the New Local Plan was submitted to the Secretary of State on Thursday 29 March 2018, and a public examination undertaken by an independent Planning Inspector will be held later this year. As the New Local Plan is yet to be adopted, only moderate weight can be afforded to its policies, but in the interests of completeness these are considered in full below nonetheless.

Emerging Policy RL1 'Network and Hierarchy of Centres' follows the adopted guidance detailed in the RCAAP and Core Strategy. It seeks to ensure that the vitality and viability of Central Reading is maintained and enhanced. Of particular note is Paragraph 4.6.17, which seeks to retain a strong element of A1 uses in the core of Central Reading, stating that, *"retail is the primary contributor to vitality and viability."*

Paragraph 5.2.9 notes that in terms of retail, Broad Street, along with the Oracle and the Broad Street Mall, are currently the hub of retail in Reading and have by some distance the highest levels of footfall.

Proposed Development

Full planning permission is being sought for a change of use from a Beauty Treatment Clinic (Sui Generis) to a Travel Agent (Use Class A1) at the ground floor of No. 37, Broad Street. The application is required to enable the occupation of the existing vacant unit by Thomas Cook, and will reinstate an A1 use back into Reading Central.

It should be stressed that this application will not result in any additional floorspace and relates solely to the change of use. Should it be approved, a subsequent application for any required internal / external works to the building, will be submitted, when the proposed occupier's detailed operational requirements are fully understood.

Justification for the Proposed Development

By virtue of the site's location within Reading Central, the acceptability of any future development will be assessed primarily against Core Strategy Policies CS26 and CS27 and RCAAP Policy RC6, which are considered below.

Read together, Policies CS26, CS27 and RC6, seek to direct retail development (within Use Class A1) towards Reading Central. The proposal will facilitate the occupation of No.37 by Thomas Cook, a Travel Agent, whose operations fall within Use Class A1. In this respect, the proposal seeks to reinstate a preferred A1 use back into the Primary Shopping Area in Reading Central, which accords with the primary objectives of Policies CS26, CS27 and RC6.

Policies CS26, CS27 and RC6 also seek to ensure that the vitality and viability of Reading Central is maintained and enhanced by retaining its retail character. Indeed, Emerging Policy RL1 acknowledges the importance of A1 uses in such locations stating that, *"retail is the primary contributor to vitality and viability."*

As well as strengthening the retail character of Reading Central, the proposal will also maximise the chances of putting the ground floor premises at No. 37 – which is presently vacant – back into a sustainable economic use. In this respect, the proposal will strengthen the success and vitality of Reading Central, in accordance with Policies CS26, CS27 and RC6. The occupation of the property will provide an animated frontage onto Broad Street – an area of high pedestrian footfall – which will further contribute to Reading Central's vitality and economic strength.

On the basis of the above, the proposal fully complies with Core Strategy Policies CS26 and CS27 and RCAAP Policy RC6. From a land use perspective, therefore, the proposal is acceptable.

Other Considerations

Design and Heritage

It should be stressed that this application relates solely to the change of use – no internal or external alterations are being proposed at this stage. As a consequence, the proposal will not affect the historic status or fabric of the listed building, nor will it negatively impact on the setting or significance of the wider terrace of listed buildings.

Amenity Impact

The surrounding area comprises a mix of commercial uses including office and retail. It is therefore considered that the proposal to reinstate an A1 use at ground level would not materially harm the amenities of nearby occupiers, in accordance with Policy DM4 of the Sites and Detailed Policies Document.

Transport & Highways

The proposed Travel Agent falls within A1, a use class previously accepted at No.37 and one that is preferred within Reading Central – it will not lead to an increase in floorspace and will not result in the intensification of use. There is, therefore, no potential for an increase in traffic generation.

It should also be noted that the property is located in an area well served by bus, rail, and pedestrian links, which will encourage sustainable modes of travel to and from the property.

Conclusions

This full planning application is for the proposed change of use of the ground floor at 37 Broad Street from a Beauty Treatment Clinic (Sui Generis) to a Travel Agent (Use Class A1). If approved, this application, will facilitate the occupation of the vacant floorspace at No.37 by Thomas Cook.

The proposal seeks to reinstate an A1 use back into the Primary Shopping Frontage in Reading Central, which is fully supported by Policies CS26, CS27 and RC6. As well as strengthening the retail character of Reading Central, the proposal will also maximise the chances of putting the ground floor premises back into a sustainable economic use, providing an animated frontage onto Broad Street. These factors combined will contribute towards enhancing the economic strength, viability, and vitality of Reading Central.

In land use terms, the proposal is acceptable as it fully meets the criteria of Core Strategy Policies CS26 and CS27 and RCAAP Policy RC6. Furthermore, it has been demonstrated that the proposal is acceptable in terms of design, heritage, amenity, and transport. In conclusion, JLL considers, therefore, that the proposed development should be supported by the Council and the additional investment welcomed.

I trust that the documents submitted via the Planning Portal are acceptable to validate the planning application and I look forward to receiving the notices of registration. If you require any further information or clarification, please contact the undersigned on the details at the top of the letter.

Yours Faithfully,

A handwritten signature in black ink, appearing to read "A. Rogerson", with a long, sweeping horizontal line extending to the right.

Alex Rogerson
Senior Planning Consultant
For and on behalf of JLL