

Planning Statement

5 Weighbridge Row, Reading

Christ Embassy

December 2015

Turley

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Reading Borough Council

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1. Introduction

1.1 This Planning Statement has been prepared by **Turley** to accompany a full planning application for a “Temporary (3 year) change of use of B1 unit to D1 place of worship and community meeting rooms (Resubmission of 10/00985/FUL)” at **5 Weighbridge Row, Reading**.

1.2 In addition to this Planning Statement the following documents also accompany the application and provide the information necessary to describe, assess and determine the proposals.

- **Site Location (Red Line) Plan – Ref.**
- **Flood Risk Assessment prepared by Glanville – CV8151172/CS/DW/004**
- **Transport Statement prepared by Motion**

1.3 This Planning Statement is structured as follows:

- Description of the Site and Context (*Section 2*);
- A summary of the Planning Policy Context (*Section 3*);
- Planning Assessment (*Section 4*); and
- Summary and Conclusions (*Section 5*).

2. The Site and Context

Site and Surroundings

- 2.1 The location of the application site [“the site”] is shown on the submitted site location plan. The site is located within Reading Borough within the settlement of Reading, approximately 1km from Reading station and town centre.
- 2.2 The application site comprises an L shaped two storey building at the end of Weighbridge Row, a small cul-de-sac containing 6 units. Weighbridge Row is located off Cardiff Road which is part of the wider Employment Area (Richfield Avenue Core Employment Area).
- 2.3 As well as being within Richfield Avenue Core Employment Area, the site is also within an air quality management area, Flood Zone 2 and within the 50m buffer area of a biodiversity action plan habitat. The site is not within a conservation area and does not contain any listed buildings or structures.

Relevant Planning History & Background

Planning Applications

- 2.4 The following planning history is applicable to the application site:
- 2.5 **Ref 10/00985/FUL** - Temporary (3 year) change of use of B1 unit to D1 place of worship and community meeting rooms (Resubmission of 10/00316/FUL) - Application Permitted - 02 August 2010. This application was approved under Officer delegated powers.
- 2.6 **Ref 100309** - Change of use of B1 unit to D1 place of worship and community meeting rooms - Application Withdrawn - 28 April 2010

Other relevant planning history

- 2.7 **Church of God Worldwide Mission, The Deliverance Centre, 12 Portman Rd, Reading, RG30 1EA** - 141334 – Permanent change of use of the second floor from office to church & community use (class D1) - (Re-submission of planning application 140438) - Application Permitted - 18 December 2014. The relevance of this permission to the current proposals for 5 Weighbridge Road is expanded upon in section 4.
- 2.8 It is also noted that the following nearby churches are located within the Core Employment Area:
- Reading West Seventh-day Adventist Church, 24 Portman Rd, Reading, RG30 1EA
 - Reading Ghana S D A Church, 74 Battle Square, Reading RG30 1AL
- 2.9 The planning status of these uses are however unclear.

3. Planning Policy Context

Development Plan

- 3.1 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. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'.
- 3.2 The application will need to be assessed against the following policies:

National Policy

National Planning Policy Framework

- 3.3 The **NPPF** was published on the **27th March 2012** and sets out the Government's planning policies for England and how these are expected to be applied.
- 3.4 At the heart of the **NPPF** is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. Sustainable development includes three elements – economic, social and environmental.
- 3.5 Paragraph 70 of the NPPF highlights that:

“To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*

- guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;*

- ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and*

- ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.”*

National Planning Policy Guidance

- 3.6 The **National Planning Practice Guidance** (NPPG) supports the **NPPF** and provides guidance on the consideration and determination of planning applications, and various other technical and procedural matters, supporting the overall implementation of the policy contained within the **NPPF**.
- 3.7 The NPPG highlights that:

“development proposals can support strong, vibrant and healthy communities and help create healthy living environments which should, where possible, include making physical activity easy to do and create places and spaces to meet to support community engagement and social capital” (Paragraph: 003 Reference ID: 53-003-20140306).

Local Policy

Reading Borough Local Development Framework – Adopted Core Strategy (2008)

- 3.8 **Policy CS3 (Social Inclusion and Diversity)** states that for Major developments applications should demonstrate measures to enhance social inclusion in terms of access to housing, employment, services, community facilities, leisure, health, education, and other services and facilities. Development should recognise and take account of the social and cultural diversity of the area in which it is located, and contribute to the enhancement of local distinctiveness. All members of the population should be provided with access to good quality health, education and other social facilities.
- 3.9 **Policy CS4 (Accessibility and the Intensity of Development)** states that the scale and density of development within the Borough will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities. Sites will be assessed in terms of their level of accessibility to a defined district or local centre with a good range of facilities by pedestrian routes, and to a bus stop served by a strategic bus service.
- 3.10 **Policy CS11 (Use of Employment Land for Alternative Uses)** states that within the Core Employment Areas, the overall level of employment land should be maintained. Proposals that would result in a loss of such land will not be permitted.
- 3.11 **Policy CS12 (Maintaining a Variety of Premises)** states that a range of types and sizes of units should be present in the Borough, and proposals should maintain or enhance this range. In particular, the overall level of start-up and grow-on space should be maintained and, where possible, increased, and any loss of small units should be offset by new provision.
- 3.12 **Policy CS20 (Implementation of the Reading Transport Strategy)** states that planning permission will not be granted unless the proposed development contributes appropriately to the provision of a balanced transport network as outlined in the Reading Transport Strategy.
- 3.13 **Policy CS22 (Transport Assessments)** states that planning permission will not be granted unless development proposals 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, in accordance with an agreed transport assessment submitted as part of the application.
- 3.14 **Policy CS24 (Car / Cycle Parking)** states that maximum car parking standards and cycle parking requirements will be applied in relation to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.
- 3.15 **Policy CS31 (Additional and Existing Community Facilities)** 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. Community facilities should be located where there is a choice of means of travel (including walking and cycling), and in existing centres where possible. Proposals involving the redevelopment of existing

community facilities for non-community uses will not be permitted, unless it can be clearly demonstrated that there is no longer a need to retain that facility.

- 3.16 **Policy CS35 (Flooding)** states that planning permission will not be permitted for development in an area identified as being at high risk of flooding, where development would reduce the capacity of the flood plain to store floodwater, impede the flow of floodwater or in any way increase the risks to life and property arising from flooding.

Sites and Detailed Policies Document (2012) (Altered 2015)

- 3.17 **Policy SD1 (Presumption in Favour of Sustainable Development)** states that a positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.
- 3.18 **Policy DM1 (Adaptation to Climate Change)** states that all developments will demonstrate how they have been designed to incorporate measures to adapt to climate change.
- 3.19 **Policy DM4 (Safeguarding Amenity)** states that development will not cause a significant detrimental impact to the living environment of existing or new residential properties.
- 3.20 **Policy DM12 (Access, Traffic and Highway Related Matters)** states that in determining proposals involving a new or altered access onto the transport network, improvement works to the transport network, the creation of new transport infrastructure or the generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment.
- 3.21 **Policy DM19 (Air Quality)** states that development should have regard to the need to improve air quality and reduce the effects of poor air quality.
- 3.22 **Policy SA12 (Core Employment Areas)** designates thirteen areas, as shown on the Proposals Map, are defined as Core Employment Areas. Of relevance to this site is SA12g: Richfield Avenue
- 3.23 **Reading Borough Council Supplementary Planning Documents**
- 3.24 **Revised Parking Standards and Design SPD (2011)** sets out the parking and design standards for the Borough.
- 3.25 **Sustainable Design and Construction SPD (2011)** brings together relevant national guidance. It provides practical advice on the forms of sustainable design and construction plus waste minimisation that will meet policy requirements. Given the application seeks consent for the change of use of the site much of the requirements of the SPD are not applicable however regard has been had to its overall aspirations.

Key Policy Considerations

Core Employment Area

- 3.26 The site is within an area defined as a Core Employment Area in the Reading Borough Core Strategy (January 2008). Policy CS11 advises that “*within the Core Employment Areas, the overall level of employment land should be maintained. Proposals that would result in a loss of such land will not be permitted.*” The supporting text to the policy continues to state:

“the Core Employment Areas provide space that is required to ensure that the Reading economy is balanced and that those activities which support higher value businesses are in close proximity. As a result, an overall loss of employment land in these core areas would risk undermining the local economy, and should not be permitted.”

- 3.27 In addition, policy CS12 continues that a range of types and sizes of units should be present in the Borough, and proposals should maintain or enhance this range. Paragraph 5.16 of the supporting text also details “*Development in the Core Employment Areas that reduces the range of sites and space available will not be permitted*”. Paragraph 15.2.5 of the supporting text to policy SA12 reiterates that there is a “*general presumption against loss of employment land in these [Core Employment] areas*”.

The precise extent of the Core Employment Area is defined through Policy SA12 of the Site Allocations and Development Management Policies DPD. The site is located within SA12g Richfield Avenue Core Employment Area.



Site location (shown X) within Richfield Ave Core Employment Area (SA12g). Portman Road Core Employment Area (SA12h) to west.

This policy position was in place at the time of the previous consent when permission was granted under application reference 10/00985/FUL. The site had previously been vacant for a period of three years despite having been marketed for B1 uses. There were also other similar vacant units in the area.

Paragraph 22 of the NPPF states:

*“Planning policies should avoid the long term protection of sites allocated for employment use **where there is no reasonable prospect of a site being used for that purpose**. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for **different land uses to support sustainable local communities**”* (our emphasis).

- 3.28 The NPPF is an additional material consideration since the grant of the original permission ref. 10/00985/FUL, and it is an additional factor in favour of the scheme given the wording of paragraph 22 referenced above.

Community Use

- 3.29 It is acknowledged that the lawful use of the site is not D1 (Place of Worship) as the temporary permission has now elapsed (and the authorised use reverted back to B1).

Nonetheless a community use has established itself since the temporary permission dated August 2010, and the site now serves an important community function. It is therefore considered proper to address Development Plan policies relating to community uses.

3.30 Community facilities are considered in chapter 10 of the Core Strategy. A 'place of worship' fits within the definition of a community facility (10.2).

3.31 In the chapter 10 'Introduction' it is stated that *"the provision of sufficient good quality community facilities is crucial to ensuring that Reading is a place in which people want to live and to continue living"* (10.1).

3.32 Policy CS31 (Additional and Existing Community Facilities) states that community facilities should be located where there is a choice of means of travel (including walking and cycling), and in existing centres where possible.

3.33 Paragraph 10.8 states that *"policy in the Core Strategy will generally encourage proposals that would increase the range or improve the quality of facilities serving Reading's communities, as long as there would not be significant adverse impacts on the amenity or character of surrounding areas"*.

3.34 Paragraph 10.8 goes on to state that *"The most appropriate location for community facilities will be in or on the edge of existing centres identified in the network in Policy CS26, which will maximise access for the greatest number of people."*

3.35 Paragraph 69 of the NPPF states:

"The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see."

3.36 Following this, paragraph 70 of the NPPF states:

"To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;

- guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs".

As such, the NPPF is considered to be an additional material consideration in favour of the scheme which was not in place at the time of granting of the original permission (ref. 10/00985/FUL) for the temporary change of use of the site.

4. Planning Assessment

Core Employment Area

- 4.1 The site is within an area defined as a Core Employment Area in the Reading Borough Core Strategy.
- 4.2 The application seeks a further temporary permission for the change of use of the site to D1 use as per the previous consent which expired in August 2013 (ref 10/00985/FUL). At the time of this application a robust marketing exercise was carried out showing that the property had been sufficiently marketed for B1 use for at least three years and at a reasonable price without success.
- 4.3 Notably, the Officer's Report which assessed the previous temporary proposals highlighted that:

"Currently the site is vacant and has been on the rental market for 3 years; the applicant has provided evidence showing that the property had been sufficiently marketed for B1 use for at least three years and at a reasonable price without success. The applicant has also provided detailed evidence of a large number of similar units in the Cardiff Road area which are also being marketed without success. Therefore it is considered that it has been adequately demonstrated that the site is currently not viable as a B1 unit. As such given the number of vacant units in the area it is considered that the change of use of the site would enhance the vitality and viability of the site and therefore the local amenity; and would be unlikely to have a detrimental effect on the character of the area."

(5 Weighbridge Row temporary permission 10/00985/FUL)

- 4.4 The applicant seeks permission to continue the D1 use for a further three years. It is acknowledged that the site has not been actively marketed since prior to the original application in 2010. However this is because the current tenant is keen to remain at the site and the landlord would be content for this to take place, and therefore further marketing has not been undertaken.
- 4.5 The other factor relevant to the consideration of ref 10/00985/FUL was vacancy rates in the locality. Whilst the market has picked up since the original consent, there are still vacant units in the locality. The presence of vacant units was relevant in the previous temporary consent, and they are again for this scheme. As previously concluded, the presence of vacant units means that there are other opportunities available within Core Employment Area and this proposal would not preclude businesses from finding employment floorspace.
- 4.6 As per the previous consent, and as highlighted in the Officer report for that scheme, the application seeks temporary period of three years. After this time the lawful use of the site would again revert to B1 purposes. As such the consent would not prejudice the future use of the site for B1 purposes once the D1 use has ceased.

- 4.7 Whilst this application seeks only temporary permission, it is relevant to note that in other cases material considerations have been judged to outweigh the *permanent* loss of employment floorspace.
- 4.8 In terms of the Council's interpretation of employment policies in past decisions, the determination of the proposals at **12 Portman Road** for the permanent change of use from B1 to D1 (church and community use) is notable. The following is taken from the Officer's report:
- "Core Strategy Policies CS10 and CS11 aim to focus employment uses within Core Employment Areas and stipulate that the loss of employment land should not be allowed unless, amongst other things, the continued use of the site for employment uses is unviable and/or the need for alternative uses is stronger than the need to retain the employment land. Policy CS31 states that proposals for new, extended or improved community facilities will be acceptable.*
- Notwithstanding the aims of Policies CS10 and CS11, the previous permissions on this site have meant that less than a third of the overall floorspace is in an authorised use for B1 offices. In light of this fact and when considering the community benefits associated with the proposal and the applicant's claim that the second floor is no longer viable as office space, the proposed loss of this site as employment land is considered acceptable."*
- 4.9 The application was approved in December 2014 importantly therefore it was in the same planning policy context and a broadly comparable economic climate. It is clear from the officer's report that despite the permanent loss of employment floorspace as was the case for that application, the benefits of the proposals were considered to outweigh this loss. It is considered that greater weight would have been attributed to this permanent loss than would be applicable to the temporary change of use proposed in this application.
- 4.10 Given the size and temporary nature of this scheme, it is suggested that the loss of employment land (CS11) and the variety of stock available (CS12) would not be material in terms of harm to the local economy.

Community Use

- 4.11 It is acknowledged that the lawful use of the site is not D1 (Place of Worship) as the temporary permission has now lapsed (and the authorised use reverted back to B1). Nonetheless a community use in this location even for a temporary period does serve an important community function.
- 4.12 Paragraph 10.8 states that *"policy in the Core Strategy will generally encourage proposals that would increase the range or improve the quality of facilities serving Reading's communities, as long as there would not be significant adverse impacts on the amenity or character of surrounding areas"*.
- 4.13 In terms of the hours of use, the main services are on Wednesdays (7pm – 9pm) and Sundays (10am – 12:30pm). The community use has already been taking place for a number of years, and the purpose of this application is to continue this use for a further three years.

- 4.14 It is noted that Environmental Health have not received any complaints in terms of noise/disturbance during its operation, and it considered that due to the low scale of operation that it does not have a significant adverse impact on amenity or character. This differs notably from the recently refused application at 141 Cardiff Road (150413/FUL) for a permanent change of use, where significant concerns were raised in relation to the issues associated with its previous temporary consent, and as such the current proposals are considered to materially differ from this.
- 4.15 Paragraph 10.8 of the Core Strategy highlights that *“The most appropriate location for community facilities will be in or on the edge of existing centres identified in the network in Policy CS26, which will maximise access for the greatest number of people.”* Policy CS31 (Additional and Existing Community Facilities) states that *“community facilities should be located where there is a choice of means of travel (including walking and cycling), and in existing centres where possible.”*
- 4.16 The site is located within 1km of Reading town centre (regional centre) and Oxford Road and Caversham (district centres) as defined by Policy CS26, and therefore the site is on the edge of existing centres. In terms of access to public transport, the site is a 0.6 mile walk to Vastern Road bus stop and 0.6mile walk to Reading train station. Therefore the site is a highly accessible location and a very suitable site for a community use in accordance with policy CS31.
- 4.17 It is finally worth re-emphasising paragraph 69 of the NPPF, which states:
- “The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities.”*
- 4.18 The nearest Christ Embassy church is Farnborough and therefore the church under consideration has an important role to play in the Berkshire catchment area. The NPPF encourages positive planning for cultural facilities, and the site is considered to be in a highly sustainable location to serve this catchment, and we would encourage you to grant a further 3 year temporary consent for this essential facility.

Flood Risk

- 4.19 The site is located within Flood Zone 2 according to the Environment Agency's flood map. The application is accompanied by a Flood Risk Assessment prepared by Glanville. The Flood Risk Assessment concludes that:

“the proposed change of use from offices to a place of worship complies with all relevant planning policy concerning flood risk and will not increase flood risk on the site or elsewhere. As such, the proposals are considered acceptable in flood risk terms.”

Highways, transport and parking

- 4.20 The application is accompanied by a Transport Statement prepared by Motion. The Transport Statement demonstrates that the site benefits from access to a good network of pedestrian links, which connect the site to the public transport network that serves the local area. On that basis, it is considered that the site is located to provide a real choice of travel modes to and from the site.

- 4.21 The parking provision on-site conforms with the requirements of Reading Borough Council's Supplementary Planning Document "Revised Parking Standards and Design" and the parking surveys have shown that there is sufficient capacity on street for any over flow parking.
- 4.22 It has been shown that the proposals are unlikely to have a material impact upon the local highway network. Indeed, the vehicle trips weekly generations indicate that the church will generate less trips than that by a B1 office use.

5. Summary and Conclusions

- 5.1 This Planning Statement has been prepared by **Turley** to accompany a full planning application for a “Temporary (3 year) change of use of B1 unit to D1 place of worship and community meeting rooms (Resubmission of 10/00985/FUL)” at **5 Weighbridge Row, Reading**.
- 5.2 The purpose of the application is to extend the previous temporary permission on site. Whilst the market has picked up since the original consent, there are still vacant units in the area. Therefore there are other opportunities available within Core Employment Area and this proposal would not preclude businesses from finding employment floorspace.
- 5.3 The proposal is to lawfully re-establish a sustainable community use, which has operated since the original permission in 2010. National and local planning policy recognises the importance of catering for the needs of all sectors of the population, and the site represents a suitable location for the community use given its connectivity to regional/district centres and public transport, including Reading station. The NPPF encourages positive planning for cultural facilities, and the site is considered to be in a highly sustainable location to serve its catchment area.
- 5.4 Taken on its own merits, the scheme is not considered to materially deplete employment land in the area, and in case is only for a temporary change of use meaning that there will be no permanent loss of employment land. When considered against the Development Plan and the NPPF the benefits of the scheme are considered to clearly outweigh any temporary loss of employment floorspace. In any event conflict with policies in the Development Plan does not, of itself, constitute harm.
- 5.5 We therefore urge the Council to approve this application.