

PLANNING STATEMENT

CENTRAL POINT, 25-31 LONDON ST, READING, RG1 4PS.

FULL PLANNING APPLICATION FOR THE USE OF THE 2ND AND 3RD FLOORS FOR THE
PROVISION OF EDUCATIONAL SERVICES (USE CLASS F1a)

Prepared by Jay Everett BSC Hons MRTPI Director,
Addison Planning Consultants Ltd on behalf of
Innovate Associates

12th June 2024



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QUALIFICATIONS AND EXPERIENCE

- 1.1 My name is Jay Everett and I have been a Chartered Member of the Royal Town Planning Institute since 1993. I hold a degree in Town and Regional Planning, and I am Managing Director of Addison Planning Consultants Ltd.
- 1.2 I have 32 years of experience of working in the field of town planning, including 12 years in local government working in both planning policy and development control and 20 years acting for landowners, developers, occupiers, and investors throughout the North of England. My involvement in the property market involves the preparation of complex planning applications, strategic promotion of land and property through the local planning policy system and acting as expert witness at planning appeals.
- 1.3 My Statement deals with the planning policy context relating to the site and specifically the history of the application site, why the proposed scheme has been developed and the planning policy context for the proposals. I then consider the planning case for the scheme.
- 1.4 **Chapters 2 to 4** introduce the proposal. Chapter 3 describes the site and its environs, and the planning history. Chapter 4 examines the planning policy context for the consideration of the proposals.
- 1.5 **Chapter 5** of my Statement examines the planning case for the proposed scheme.
- 1.6 **Chapter 6** summarises the principal conclusions from Chapters 5.

INTRODUCTION & BACKGROUND INFORMATION

- 2.1 This Statement has been prepared on behalf of Innovate Associates, who are acting on behalf of the prospective occupiers of Central Point, 25-31 London St, Reading, RG1 4PS.
- 2.2 Central Point is an existing office building (built circa 1993) located within the Central Area of Reading and adjacent to the main shopping area. The extant use of the building (Central Point Reading) is therefore as an Office Use which falls within the recently re-defined Class E of the Use Classes Order: specifically, Class E(g)(i): *"Offices to carry out any operational or administrative functions."*
- 2.3 The prospective occupiers of the building are affiliated to Buckingham University who are seeking to acquire the building to provide a Dental Clinic together with a Dental Academy. The proposal is to utilise the building as follows:
- GF: Dental Clinic
 - FF: Dental Clinic
 - SF: Dental Academy
 - TF: Dental Academy
 - FT: Offices administration and staff facilities for academy and clinic.
- 2.4 The proposed use of the Ground and First Floors as a Dental Clinic would fall within Use Class E(e) *"Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)."* The use of the Fourth Floor would fall within the current extant use E(g)(i) *"Offices to carry out any operational or administrative functions."* As these uses fall within Class E, a change of use would not occur.
- 2.5 However, the proposed use of the second and third floors, as a Dental Academy use, would comprise the provision of education services for both graduate and post graduate training. The use of these floors falls within Use Class F1 *"Learning and non-residential institutions"* and specifically Use Class F1(a) *"Provision of education"*.
- 2.6 Given the nature and scale of the proposed educational use of the second and third floors, there is a material change from the existing use as an Office. A change of use application is therefore required relating to those floors.

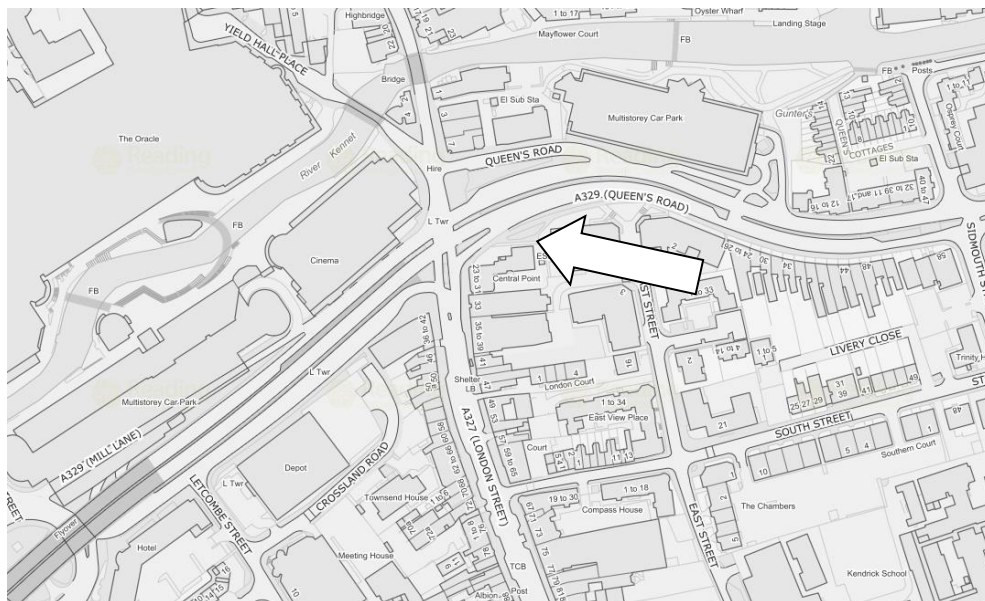
INTRODUCTION & BACKGROUND INFORMATION

- 2.7 A Design and Access Statement (together with detailed plans) have been prepared to explain how the second and third floors (with a combined floorspace of approximately 796 sq. metres) will be utilised for the proposed use. In addition, a Transport Statement and Travel Plan have also been prepared to accompany the submissions.
- 2.8 The proposed description of the development is as follows:
- "FULL PLANNING APPLICATION FOR THE USE OF THE 2ND AND 3RD FLOORS FOR THE PROVISION OF EDUCATIONAL SERVICES (USE CLASS F1a)".*
- 2.9 The following section of this Statement therefore sets out a description of the site and its surroundings and its Planning History.

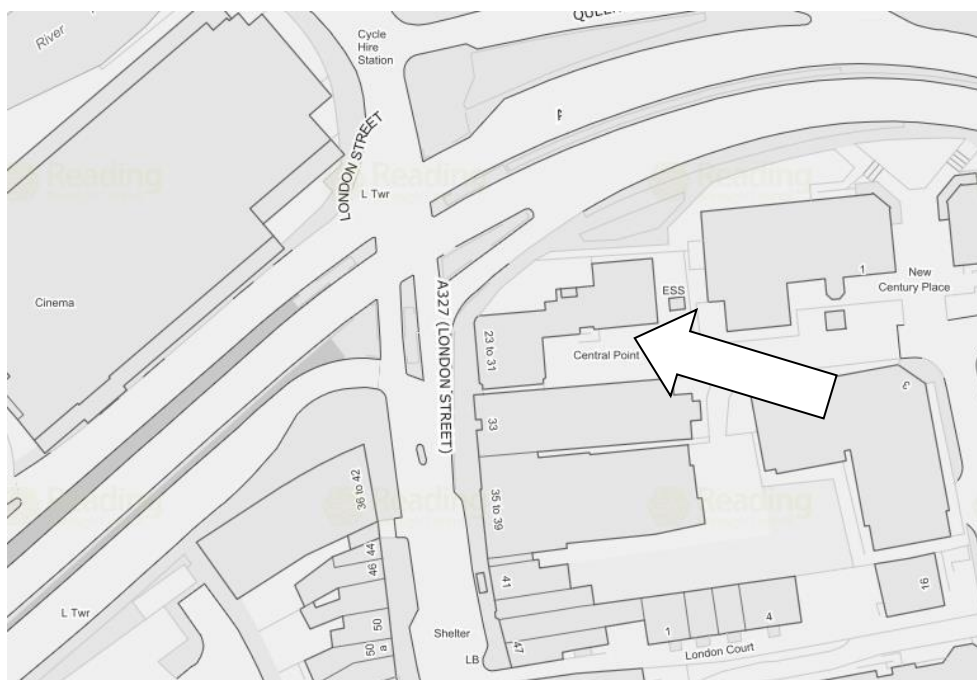
SITE DESCRIPTION AND PLANNING HISTORY

SITE LOCATION

- 3.1 The property is located within the Central Area of Reading adjacent to the main shopping area off London Road. The map below shows the location of the property relative to the town centre which is located to the northwest.



- 3.2 The map below shows the location of the premises in more detail.



SITE DESCRIPTION AND PLANNING HISTORY

- 3.3 The aerial photograph below shows the Application Site relative to its surroundings.



PLANNING HISTORY

- 3.4 The following Planning History has been derived from the Council's Public Access database – a full Land Search has not been undertaken and there may therefore be other planning applications relating to the site.
- 3.5 Ref. 960295: Wessex House 25-31 London Street Reading RG1 4PS
Description: Change of use of part of ground floor to A2 (Financial & Professional Services). Determined June 1996
- 3.6 Ref 090317: Site Address: Wessex House 25 - 31 London Street Reading Berkshire RG1 4PS
Description: Change of use of ground floor from A2 (Financial Services) to B1(a) offices and retention of upper floors as B1(a) offices. Refurbishment of existing office building, external glass canopy, landscaping to front, re-surfacing and re-marking of the car park/yard and air conditioning condenser units and transformer unit in the rear yard (Resubmission of 08/00863/FUL). Determined April 2009.
- 3.7 Ref 080886: Site Address: 25-31 London Street Reading RG1 4PS
Description: Refurbishment of existing office building, external glass canopy, hard landscaping to front, re-surfacing car park/yard and air

SITE DESCRIPTION AND PLANNING HISTORY

conditioning condenser units and transformer units in rear yard.
Determined December 2008.

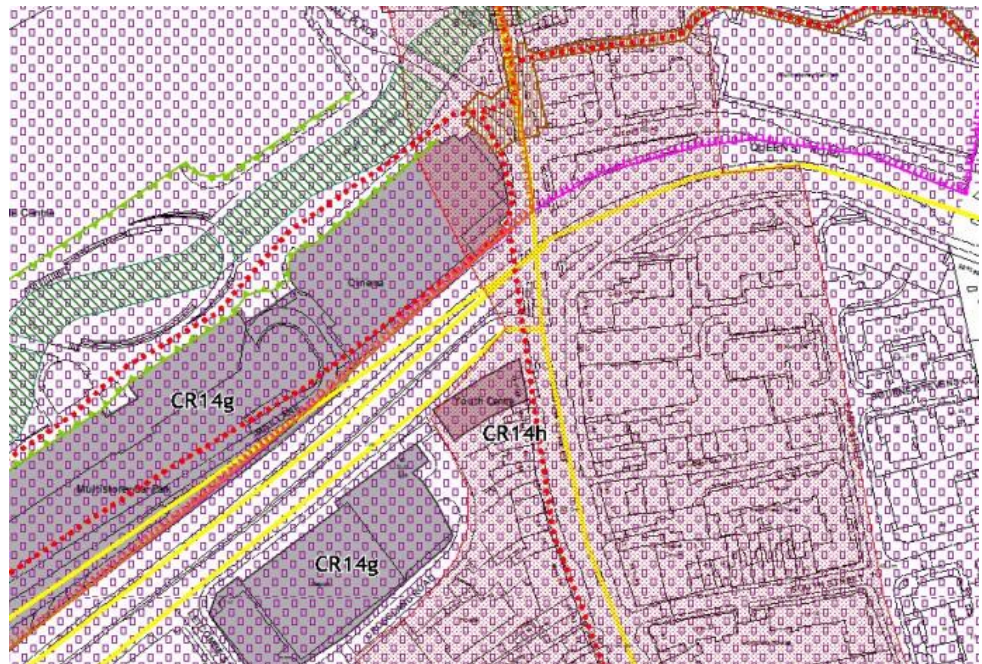
- 3.8 Ref. 100270: Site Address: 25-31 London Street Reading RG1 4PS
Description: Nonmaterial change to planning permission
08/00863/FUL for new acoustic louvres and relocation of air
conditioning units to plant room on roof. Approved February 2010.

PLANNING POLICY CONTEXT

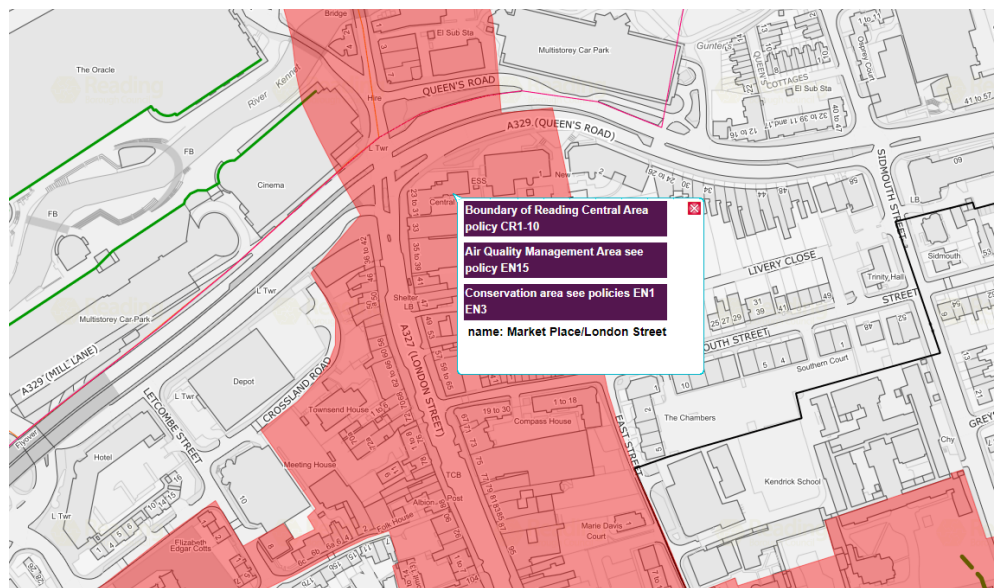
- 4.1 The following paragraphs set out a description of relevant adopted Development Plan.

THE DEVELOPMENT PLAN

- 4.2 The Town and Country Planning Act 1990 (the '1990' Act, as amended) and the Planning and Compulsory Purchase Act 2004 (the '2004 Act') establish the legislative basis for town planning in England and Wales. Together the Acts establish a 'plan led' system which requires Local Planning Authorities to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.
- 4.3 Reading Borough Local Plan was adopted on 4th November 2019. This document sets out the Council's planning policies for development in Reading up to 2036 and is the main consideration in deciding planning applications.
- 4.4 The extracts below from the Local Plan Proposal Map shows that the subject premises are located within the Central Area policy boundary but outside of the Primary Shopping Area and Central Core policy areas (as defined in Policy CR1). The site is located within a Conservation Area.



PLANNING POLICY CONTEXT



4.5 The following policies, as far as they are consistent with the NPPF, are likely to be relevant to the consideration of the application proposal:

EN1: PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT

TR1: ACHIEVING THE TRANSPORT STRATEGY

TR4: CYCLE ROUTES AND FACILITIES

TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING

RL1: NETWORK AND HIERARCHY OF CENTRES

OU1: NEW AND EXISTING COMMUNITY FACILITIES. This policy interprets community facilities as including educational facilities.

CR1: DEFINITION OF CENTRAL READING. Having regard to this policy and the proposals Map, the site lies within the Central Area policy boundary but outside of the Primary Shopping Area and Central Core policy areas (as defined in Policy CR1).

4.6 The following chapter of my Statement therefore examines the case for planning within this planning policy context which includes the NPPF and NPPG.

ASSESSMENT OF PLANNING CASE

- 5.1 I have structured my Statement to firstly assess the principle of the proposed development. I then assess any other planning issues and make my conclusions.

PRINCIPLE OF RESIDENTIAL DEVELOPMENT

- 5.2 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The adopted Local Plan is the starting point for determination of any planning application.

- 5.3 The NPPF is a material consideration which at paragraph 11 requires local planning authorities:

“(c) to approve development proposals that accord with an up-to-date development plan without delay; or

(d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

(i) the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

(ii) 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.”

- 5.4 Paragraph 12 advises that where a planning application conflicts with an up-to-date Development Plan (including any Neighbourhood Plans that form part of the Development Plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date Development Plan, but only if material considerations indicate that the plan should not be followed.

- 5.5 Regarding the principle of development, the local planning policy context is set out in the preceding section of this statement. Section 5.2 of the Local Plan sets out the Strategy for Reading and paragraph 5.2.1 sets out the key policy principles of redevelopment which include promoting a variety of different uses, including educational uses:

ASSESSMENT OF PLANNING CASE

"5.2.1 The following represent some key principles for the area:

a. The centre will contain a broad range of different but complementary uses within an area easily accessed by foot.

*b. The centre will appeal to all sectors of Reading's population as a place to live in, work in, **study in** and visit."*

- 5.6 Policy CR1 (Definition of Central Reading) defines policy areas within the centre which then form the basis for the application of subsequent policies. In this location (within the Central Area policy boundary but outside of the Primary Shopping Area and Central Core policy areas as defined on the Proposal Map) there are no Development Plan policies that seek to prevent the change of use of existing offices to educational use.
- 5.7 Policy OU1 (New and Existing Community Facilities) considers proposals for new, extended, or improved community facilities. Paragraph 4.7.2 states that community facilities mean different things to different people but that term "...could encompass health facilities, education and training facilities (at all levels)."
- 5.8 Policy OU1 provides a presumption in favour of new community facilities and seeks to manage the impact of intensifying the use of existing facilities. The application proposal is not, however, concerned with the intensification of use of an existing community facility. The policy goes on to state that: *"New community facilities should be located where there is a choice of means of travel (including walking and cycling), and in existing centres where possible."*
- 5.9 The premises are of course ideally located within the Central Area and immediately adjacent to the Primary Shopping Area and Central Core policy areas. Evidence is provided with the application submission (Transport Assessment) which illustrates the accessibility of the site to pedestrians and for those using public transport.
- 5.10 In my view, the application proposal does not conflict with policies CR1 or OU1 or, indeed, any other policy in the Local Plan concerning the principle of development. Moreover, the proposed use of the building as described will add vitality to the Central Area and should be regarded as a sustainable development proposal.

ASSESSMENT OF PLANNING CASE

- 5.11 As such, the principle of residential development of this site is clearly acceptable unless there is any planning harm being caused that outweighs the benefits to be gained by delivering the proposed educational use. I undertake an assessment below of this issue by assessing the policies of the NPPF.

NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

- 5.12 The NPPF states that there are three dimensions to sustainable development:
Economic.
Social; and
Environmental.
- 5.13 The proposal to utilise part of an existing office building for the provision of educational services in a highly sustainable location is precisely the type of development that the NPPF says there should be a presumption in favour of granting planning permission for. In the remainder of my statement, I consider whether there are any other material issues that should be evaluated as part of an assessment of the planning balance in this case.

DELIVERING SUSTAINABLE DEVELOPMENT – BUILDING A STRONG, COMPETITIVE ECONOMY

- 5.14 A Core Principle of the NPPF is to proactively drive and support sustainable economic development. Paragraph 19 states:

“The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need to support economic growth through the planning system.”

- 5.15 The development will result in the provision of full-time staffing jobs associated with the provision of education. In addition, students visiting the site will also have consequent positive economic benefits on the local economy. The proposal is therefore afforded significant material weight in support of it by the NPPF.

ASSESSMENT OF PLANNING CASE

PROMOTING HEALTHY AND SAFE COMMUNITIES

- 5.16 Paragraph 92 of the NPPF places a focus on creating healthy, inclusive, and safe places. Education plays a role in creating safer and stronger communities and therefore should be considered when assessing proposals.
- 5.17 The provision of an educational facility in this proposed location will add to the variety of uses in Central Reading and add to the vitality of the area. The proposed use will also meet an identified need for the provision of educational services associated with the specialist nature of the proposal to provide a Dental Academy alongside a Dental Clinic.

DELIVERING SUSTAINABLE DEVELOPMENT – PROMOTING SUSTAINABLE TRANSPORT

- 5.18 The NPPF seeks to ensure that development proposals minimise the need to travel and achieve more sustainable travel behaviour along with provision for sustainable transport.
- 5.19 The site currently provides 5 car parking spaces located to the rear of the building, accessed from East Street and 10 cycle parking spaces.
- 5.20 The location of the application site is such that there is a well-established network of pedestrian and cycle routes along key highway links providing connectivity to nearby bus stops, Reading railway station and local amenities, offering students and staff with a realistic opportunity to travel to the site by sustainable modes of transport.
- 5.21 A Transport Assessment is provided with the application submission which states at paragraph 2.11:

“2.11 The location of the site reflects requirements of the NPPF and local policy in ensuring that patterns of growth make the fullest possible use of walking, cycling and public transport, and focus significant development in locations which are sustainable. The location of the site provides a realistic choice in travel modes to cater

ASSESSMENT OF PLANNING CASE

for daily journeys which would act to reduce students and staff reliance on the private car”.

- 5.22 The Transport Statement concludes at paragraph 5.3:

“5.3 In view of the findings within this TS, it is considered that the development proposals are acceptable in transport terms and meets the local and national policy objectives. The TS demonstrates that there are no residual cumulative impacts in terms of highway safety or the operational capacity of the surrounding highway and transport networks and therefore planning permission should not be withheld on transport grounds”.

- 5.23 As such the proposal is highly unlikely to have any material or significant residual impact on traffic or road safety and so passes the test in paragraph 115 of the NPPF.

MEETING THE CHALLENGE OF CLIMATE CHANGE, FLOODING AND COASTAL CHANGE

Drainage and Flood Risk

- 5.24 The NPPF requires local planning authorities to adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, water supply and demand considerations.
- 5.25 In this case, the building is existing and already connected to the existing drainage system and there are no opportunities to change the existing arrangements.
- 5.26 As a change of use of existing floorspace the proposals will not increase the risk of flooding either on or off site and the site can be adequately drained of both surface and foul water.

CONSERVING AND ENHANCING THE HISTORIC ENVIRONMENT

- 5.27 Although the site is within a Conservation Area, the premises are existing and there are no proposals to change the external appearance. Moreover, the proposal relates only to the change of use of two existing floors within the existing office and that change will not result in a material change in the way that the building is appreciated within the Conservation Area. In my view, the proposal

ASSESSMENT OF PLANNING CASE

cannot be considered as having any material effect on the special character and appearance of the Conservation Area.

SUMMARY AND CONCLUSIONS

- 6.1 The preceding sections of this Statement have examined the planning policy context for the proposal to utilise two existing floors within an established office building for the provision of educational services.
- 6.2 Regarding the principle of the proposed use, the site lies within a highly sustainable location within Reading Central Area and adjacent to the Core Area and Primary Shopping Area. There are no specific Development Plan policies that seek to prevent the change of use of offices to educational facilities in this location. Moreover, Policy OU1 could be considered to support the proposed use due to the highly accessible location of the premises to pedestrians and public transport uses; and because it will add to the vitality of the Central Area.
- 6.3 In my view, the proposal does not conflict with any Development Plan policy and there are no physical or environmental constraints arising from the proposed use of the 2nd and 3rd floors for the provision of education.
- 6.4 Moreover, the proposal accords with the key principles for the Central Area (as set out in the Local Plan) that seek to promote a wide range of complementary uses and which includes appealing to all sectors of Reading's population as a place to live in, work in, **study in** and visit.
- 6.5 As such, I have concluded that the principle of the proposed use is acceptable having regard to the Development Plan and that no adverse effects would result from the proposed use.
- 6.6 As there are no other material considerations which would indicate otherwise, in accordance with the NPPF the proposed development should be approved without delay as it represents sustainable development.
- 6.7 I conclude that the proposals are in conformity with the Development Plan and the Policies of the NPPF and should be granted planning permission.

SUMMARY AND CONCLUSIONS

Signature:



Date: 12th June 2024.....

JAY EVERETT BSc HONS, MRTPI