

Planning, Design and Access Statement

for:

Change of use of B8 storage to Class E uses

at:

43a Church Street (First Floor)
St Martins Centre
Caversham
RG4 8BA

May 2025

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Contents

1. Introduction
2. Planning Analysis
3. Conclusion

Site

43a Church Street, St Martins Centre, Caversham RG4 7AG

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1.0 Introduction

- 1.1 This Statement accompanies a planning application proposing change of use of 43A Church Street (first floor), from B8 storage to Class E uses.
- 1.2 There are no proposed external or internal changes to the building other than the addition of some partitions that will be determined by the tenant prior to occupation. However, these works would not constitute development and therefore do not form part of the application submission.
- 1.3 The property is located within the St Martins Centre parade of shops and amenities, where there is also a car park to the south of the site which provides parking for all of the businesses located within St Martins Centre.
- 1.4 The application site is located on the first floor with access from ground level. As already stated, there are no proposed changes to the external appearance of the building or the entrance arrangements to the building.
- 1.5 The application is submitted with accompanying plans confirming that the existing and proposed floor layout and elevations are to remain the same.
- 1.6 There is no vegetation, ecology or biodiversity associated with the site.

2.0 Planning Policy

Nationally

- 2.1 The National Planning Policy Framework (NPPF) was published in March 2012 and revised in July 2018, February 2019, July 2021 and again in September and December 2023, with the latest revisions issued in December 2024.
- 2.2 The NPPF provides the Government's framework for delivering sustainable development and facilitating economic growth through the planning process. Planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise. The NPPF is a material consideration in planning decisions.
- 2.3 Paragraph 8 states that there are 3 dimensions to sustainable development: economic, social and environmental. Development which helps to build a strong, responsive and competitive economy whilst supporting vibrant and healthy communities, providing housing to meet current and future requirements is to be achieved in a manner which protects the natural, built and historic environment.
- 2.4 The NPPF states at Paragraph 11 that at the heart of the document is a presumption in favour of sustainable development. For decision taking this means approving development proposals which accord with the development plan without delay and local planning authorities should positively seek opportunities to meet the development needs of the area. The presumption in favour of sustainable development is reiterated at Paragraph 50.
- 2.5 Paragraph 39 sets out that the Local Planning Authority should approach applications in a "positive and creative way" and should work collectively with the applicant to ensure that development is delivered to benefit the area socially, economically and environmentally.

- 2.6 Paragraph 48 states that applications should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 2.7 Section 6 of the NPPF considers how to build a strong and competitive economy.
- 2.8 Paragraph 85 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 2.9 Section 7 focuses on ensuring the vitality of Town Centres. At paragraph 90 the NPPF recognises the importance of Town Centres. Policies and development which promote competitive Town Centres and support viability and vitality are desirable, as well as defining the extent of Town Centres and primary shopping areas.
- 2.10 It continues by stating that there should be an opportunity to look at the scale and type of development likely to be needed, looking at least ten years ahead and meeting anticipated needs for retail and other main Town Centre uses over that period.
- 2.11 Transport considerations are covered within Section 9 of the NPPF.
- 2.12 Paragraph 109 of the NPPF sets out that transport issues should be considered from the earliest stages of development proposals, so that, inter alia, opportunities to promote walking, cycling and public transport use are pursued.
- 2.13 Supporting paragraph 110 then goes on to state in addition that development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

- 2.14 With regard to transport implications paragraph 116 is very clear in stating that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation would be severe, taking into account all reasonable future scenarios.
- 2.15 Section 12 of the NPPF highlights the need for achieving well designed places.
- 2.16 The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities is discussed in paragraph 131.
- 2.17 Paragraph 135 points to the fact that development should be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

Locally

- 2.18 The application site is located within Reading Borough Council.
- 2.19 This application should be assessed against the Reading Borough Council Development Plan which consists of, amongst other planning documents, the Local Plan and a number of supplementary planning documents (SPDs). The Local Plan was adopted in November 2019.
- 2.20 The policies of the current Local Plan which are relevant to this application includes: Policy CC1 (Presumption in Favour of Sustainable Development); CC2 (Sustainable Design and Construction); CC7 (Design and the Public Realm); CC8 (Safeguarding Amenity); EM1 (Provision of Employment); EM2: (Location of New Employment Development); RL1 (Network and Hierarchy of Centres); RL2 (Scale and Location of Retail, Leisure and Culture Development); RL3 (Vitality and Viability of Smaller Centres); and TR5 (Car and Cycle Parking).
- 2.21 Policy CC1 of the Local Plan 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 (NPPF). Where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible.
- 2.22 With regards to sustainable design, Policy CC2, the redevelopment and refurbishment of existing building stock, will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.

- 2.23 The Council state that all development must be of high design quality that maintains and enhances the character and appearance of the area. Policy CC7 states that developments will be assessed to ensure that they respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm and are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.
- 2.24 Safeguarding amenities is covered in the wording of Policy CC8. It states that development should not cause detrimental impact on the living environment of existing residential properties.
- 2.25 Under Policy EM1 the Council consider the provision of employment within the Borough. The policy focuses more on the net increase in office space and industrial/warehouse space rather than general employment opportunities. However, in this instance the change of use from a storage use to a commercial use that will create employment opportunities as a Class E use. So in part, the scheme is compliant with the policy for providing employment opportunities, and given the location of the site, it would not impact on residential properties.
- 2.26 The wording of Policy EM2, like Policy EM1 provides a focus on employment and primarily where office development should take place. The application site is not located within any of the areas listed within the Policy and would therefore not conflict with the wording of the Policy.
- 2.27 Caversham is listed as a District Centre within the wording of Policy RL1 and it is the vitality and viability of these centres that the policy seeks to maintain and where possible enhance.
- 2.28 Ensuring that the scale of certain retail, leisure and cultural development would not have a detrimental impact on the wider setting is covered in Policy RL2 but with the Policy looking at enhancing that such uses are provided within the right settings.

- 2.29 The scheme is located within an existing parade of retail/commercial properties and would convert an existing space in a setting where Class E uses are appropriate.
- 2.30 The Council highlights the importance of the vitality and viability of smaller centres within the wording of Policy RL3.
- 2.31 The Policy talks about key frontages and use classes that are now in Class E use and the need to ensure that they are retained.
- 2.32 The site is also located at first floor level and therefore does not fall directly into the key frontage setting normally associated with ground floor uses. However, the change of use brings a non-retail/commercial unit into a commercial use, thus indirectly showing a compliance with the Policy as it is a Centre Use.
- 2.33 The wording of Policy TR5 considers how developments should ensure acceptability from sustainable transport and provide appropriate levels of parking for the intended development.

Key Planning Considerations

2.34 The key planning considerations are the following:

- i. Design Quality and Principle of Development
- ii. Impact on the Character of the Area
- iii. Relationship with neighbouring properties
- iv. Other Planning Matters

i) Design Quality and Principle of Development

2.35 The site is located within the built-up area of Caversham, in an existing retail/commercial setting, where the ground floor units are found to be within a key frontage designation where there is a presumption for commercial uses and their retention.

2.36 The application site is located at first floor level and therefore does not, strictly speaking, fall within the key frontage designation, however the development proposes the change of use of a B8 storage space to Class E uses.

2.37 At present no specific Class E use has been proposed, but rather to ensure that the space is brought into use, it is considered appropriate to apply for permission for Class E use as a whole as the site is located centrally within Caversham and has access and connections to a number of local provisions and parking. Therefore, the proposed use of the site for Class E uses would have a general accordence with the wording of Policy RL3 as it would not result in the loss of any commercial uses and more importantly, will provide an employment generating use in an appropriate location ensuring the vitality and viability of the this 'high street' setting. It would also enhance the surrounding area.

- 2.38 Additionally, as set out in Sections 6 and 7 of the NPPF, there is a requirement for Councils to set out clear economic vision and strategies for encouraging economic growth, taking into account local business needs and defining a hierarchy of town centres to promote long term viability and vitality.
- 2.39 The proposed development clearly adheres to the wording of paragraphs 85 and 90 from these two sections of the NPPF, as it will help to bring economic growth to the area as it would aid with increasing footfall to the parade and other local shops within the District Centre.
- 2.40 Consequently, the principle of development is considered to be established, and therefore acceptable for this location.
- 2.41 Therefore the development would also accord with the wording of Policies CC1, CC2 and RL1 of the Local Plan.
- 2.42 Furthermore, the development provides opportunities for employment due to the proposed use providing such provision when compared to the existing use, and therefore there is an indirect compliance with Policies EM1 and EM2.
- 2.43 With regards to the design of the development, the existing building is to remain untouched externally, with the only changes being proposed internally.
- 2.44 Therefore, as no design changes are proposed as part of this scheme, the development can be considered to comply with Policy CC2 and CC7 of the Local Plan as well as paragraph 135 of the NPPF.

ii) Impact on Character of the Area and neighbouring properties

2.45 The application site, as already stated, is located within a defined District Centre where local amenity provisions are located.

2.46 The provision of any of the uses, as set out within Class E if the use class order, at first floor level would be in keeping with the immediate setting in terms of uses.

2.47 There are no material changes proposed to the appearance of the building and therefore no harm would be caused to the immediate setting and there would no detrimental impact on the adjoining uses.

2.48 The scheme, due to being in keeping with the surrounding area in terms of use, would not have a detrimental impact on the other commercial uses and neither would it have an impact on the wider setting or nearest residential uses.

2.49 The development would therefore demonstrate compliance with Policy CC8 of the Local Plan and Section 12 of the NPPF.

iii) Other Planning Matters

Biodiversity

2.50 With regards to biodiversity, the scheme does not propose the removal of any habitat at the site as there is no grass or trees being removed as the scheme is a straight change of use of the existing property.

2.51 Therefore, the scheme would be exempt from the need to provide a biodiversity metric or report with the application.

Ecology

- 2.52 The application proposes no changes to the building and therefore there is no requirement to provide any ecology reports to support the application.

Highways and Parking

- 2.53 The application site does not benefit from having any parking directly associated with it. However, the applicant has ownership of the car park to the south of the site which provides parking provision for a number of different town centre uses.
- 2.54 In addition to that there are a number of other car parks within walking distance of the site for members of the public to use.
- 2.55 The site, whilst not benefitting from its own parking provision, is easily accessible and due to its town centre setting in a location where there would be a number of linked trips.
- 2.56 Therefore, there will be no impact on highway safety and that the cumulative impact on the local road network will not be severe.
- 2.57 Consequently, there would be no justifiable reasons for there to be any highways objections to the scheme. The proposal is therefore considered to adhere with the wording of paragraph 116 of the NPPF.

Hours of Opening

- 2.58 At present, as there is no agreed tenant, the opening hours are not proposed as they would need to relate appropriate for the future user.
- 2.59 However, there are a mix of Class E uses already within the St Martins Centre which all have different operating hours and as such, it is not considered that there would be concern about having opening hours ranging from 7am to 11pm.

Flood Risk and Drainage

- 2.60 The application property is not located within Flood Risk Zones 2 or 3, with flood risk being very low from both river and sea and there also being very low chance of surface water flooding.
- 2.61 In light of the above, the scheme is considered to adhere to the wording of Section 14 of the NPPF.

Air Quality

- 2.62 Reference to air quality is made within Policy EN15 where it talks about the introduction of sensitive uses (such as residential, schools and nurseries, hospitals, care facilities) into, or intensify such uses within, an Air Quality Management Area (AQMA).
- 2.63 The site is located within the Councils AQMA however the scheme is not proposing a new build, as the works are solely for change of use of the existing building.
- 2.64 The site is also within an existing shopping parade/centre where parking is provided through Council parking and parking immediately behind St Martins Centre rather than new parking being provided for the specific building, as the site is located within the Town Centre.
- 2.65 The site is easily accessible by public transport and through the parking provided within the Town Centre, the users of the site are more than likely to be visiting it through linked up trips.
- 2.66 The scheme is not a major development and would not lead to a material increase in congestion or HGV movements, and as stated does not require any new parking provisions to be provided, and there would be unlikely to be any air pollutants produced that would affect biodiversity areas.

2.67 It is not considered that the scheme would require the submission of an Air Quality Assessment to support the application on the basis that it would not trigger the requirements as set out in Policy EN15 or through the AQMA setting.

2.68 Therefore it is considered that the development would be compliant with Policy EN15.

Sustainability

2.69 The wording of Policy CC2 makes reference to all minor non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM 'Very Good' standard as a minimum.

2.70 The applicant has advised that it is their intention to ensure that future uses of the site would adhere to the guidance set out within the Policy.

2.71 Given that the end user is not known at this stage, it would be difficult to set out specific measures to be taken as each use will be taking into account different parameters, but all end users would meet with current standards.

2.72 To ensure this, it is noted that an appropriately worded condition can be attached to any permission granted at the site to ensure that a 'very good' BREEAM standard is met as a minimum.

2.73 The site is located in a very sustainable location and has very good links to public transport.

2.74 The development would accord with the wording of Policy CC2.

3.0 Conclusion

- 3.1 The development complies with the appropriate Policies of the Local Plan as well as demonstrating an understanding and compliance with the wording of the NPPF, with particular attention given to paragraphs 85, 90, 116 and 135.
- 3.2 This is achieved by proposing an appropriate use in a Town Centre setting that provides opportunities for employment whilst also creating a better sense of place and ensuring that the ‘high street’ setting remains a vibrant and attractive place to go through increased footfall in the Town Centre.
- 3.3 The scheme is considered to enhance the setting and aid with the economic growth of the area.
- 3.4 The scheme also draws upon the wording of paragraph 11 of the NPPF which highlights the presumption in favour of sustainable development for plan making and decision taking. This is a theme that is at the heart of the Framework.
- 3.5 Taking the above into account, this application should be granted planning permission.