

ET Planning

Planning Statement

Client:
Mr Bradbury

578 Reading Road

Winnersh, Wokingham, RG41 5HA

*Full application for the proposed change of use of
existing building to Class E and Class C3 along with
changes to fenestration*

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CIL | Enforcement | Land Promotion | Planning | Sequential Tests | Viability

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1. Introduction

- 1.1 This statement is produced to support a planning application for the change of use of an existing ancillary flat to an independent residential dwelling (Use Class C3) with the installation of a new external entrance and staircase, and other changes to fenestration, at 578 Reading Road, Winnersh, Wokingham, RG41 5HA.
- 1.2 This planning statement will cover the background to the application and provide the necessary information to enable its determination by officers at the Council. It will consider the proposal in light of relevant planning policies and other material considerations. The conclusion reached is that key material considerations and the wider objectives of National and Local planning policy support the grant of permission.
- 1.3 In addition to this planning statement, the application is accompanied by the appropriate planning application forms and ownership certificate, duly signed and completed, and the following documents prepared by Bonney Architecture:
 - BA0311-01 Existing plans – 1:50
 - BA0311-02 Existing Elevations – 1:100
 - BA0311-03 Existing Site and Location Plans – 1:500 & 1:1250
 - BA0311-04A Proposed Plans and Elevations – 1:100
 - BA0311-05 Site and Location Plans – 1:500 & 1:1250
- 1.4 The relevant application fee will be submitted by the applicant separately.

2. Site Location and Description

- 2.1 The application site is located at 578 Reading Road, Winnersh, within the administrative area of Wokingham Borough Council. The property lies on the southern side of Reading Road (A329), a main route connecting Reading and Wokingham. The site falls within the defined settlement boundary of Winnersh, where the principle of development is generally acceptable in accordance with local and national planning policy.
- 2.2 The site currently comprises a two-storey building containing a ground-floor retail shop (Use Class E) with associated ancillary office and storage accommodation, and an ancillary three-bedroom flat above which is presently accessed internally through the commercial premises. The existing building fronts directly onto Reading Road and benefits from a shared hardstanding at the front, which accommodates two dedicated parking spaces for the flat and additional spaces for the commercial unit.
- 2.3 The surrounding area is predominantly residential, with detached and semi-detached dwellings to either side (Nos. 576 and 580 Reading Road) and a mix of small commercial units and local services along the main road frontage. The site is in an established, sustainable location within easy walking distance of local shops, schools, and public transport, including Winnersh railway station and local bus services along Reading Road.

3. Planning History

- 3.1 No relevant planning history.

4. Development Proposals

- 4.1 The proposal seeks full planning permission for the change of use of an existing ancillary residential flat located above the ground-floor retail shop (Use Class E) at 578 Reading Road, Winnersh, to form a self-contained residential unit (Use Class C3).
- 4.2 At present, the flat can only be accessed internally through the commercial premises, meaning it is functionally dependent on the ground-floor use. The proposal therefore includes the creation of a new, independent external entrance and staircase on the side elevation of the building to provide direct access to the upper floor flat. This will allow the residential accommodation to operate independently of the commercial unit below. The residential accommodation will remain as a three-bedroom dwelling, with two existing allocated parking spaces retained at the front of the site. No changes are proposed to the site layout or overall footprint of the building.
- 4.3 The proposal represents a modest and sustainable form of development that will contribute an additional independent dwelling to the borough's housing supply, without detriment to the operation of the ground-floor commercial use or the character of the surrounding area.
- 4.4 Additional changes are proposed to the fenestration of the building in the form of the removal of two rear-facing windows (and their bricking up) and the installation of two south-east facing side windows as replacement.

5. Policy Assessment

5.1 **National Guidance:** The National Planning Policy Framework (NPPF) is a relevant material consideration to the application.

5.2 The purpose of the planning system is to contribute to the achievement of sustainable development. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. Paragraph 39 of the NPPF states that "Local planning authorities should approach decision on proposed development in a positive and creative way" and "at every level should seek to approve applications for sustainable development where possible". Paragraph 124 of the NPPF comments that planning should "promote an effective use of land" in "meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions".

5.3 Paragraph 61 confirms the Government's objective to boost the supply of housing, and paragraph 8 identifies the three objectives of sustainable development, as economic, environmental and social.

5.4 Paragraph 131 identifies that "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", whilst paragraph 139 states that significant weight should be given to "outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings."

5.5 The National Design Guide builds on the above, and clarifies that "well-designed neighbourhoods need to include an integrated mix of tenures and housing types that reflect local housing need and market

demand. They are designed to be inclusive and to meet the changing needs of people of different ages and abilities. New development reinforces existing places by enhancing local transport, facilities and community services, and maximising their potential use" (para 109).

- 5.6 **Principle of Development:** Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.7 All planning applications should be dealt with in accordance with the relevant development plan policies unless material considerations indicate otherwise. The NPPF is a material planning consideration in all planning applications. In this instance, the relevant development plan documents include:
 - Adopted Managing Development Delivery Local Plan (2014) (MDD)
 - Adopted Core Strategy Development Plan (2010) (CS)
 - Wokingham Borough Local Plan
- 5.8 In addition, the Council is currently preparing its new Local Plan Update 2023 – 2040 ('LPU'). This Draft Plan has passed Regulation 19 stage and is under formal examination, with Inspector public hearing sessions expected in November 2025.
- 5.9 As a consequence, some weight can be applied to the policies of the LPU, however the weight applied to individual policies will vary depending on their specific topic and contents, as set out in the case law of *Tewkesbury BC vs SSCLG [2013] EWHC 286 (Admin)*.

- 5.10 The site lies within the established settlement boundary of Winnersh, situated on the southern side of Reading Road, which forms a key route between Reading and Wokingham. While the property is firmly positioned within the built-up area, its rear boundary adjoins land of a more open, transitional character, placing it effectively on the edge of the settlement. This context provides a clear visual and functional relationship with the surrounding residential area while maintaining proximity to the wider open countryside.
- 5.11 CS Policy CP1: Sustainable development states that development proposals will be permitted provided they meet with a range of criteria, including the requirement to maintain the high quality of the environment, the need to limit any adverse effects on water quality and proposals must provide attractive, functional, accessible and safe schemes.
- 5.12 CS Policy CP3: General principles for development outlines criteria in which development must adhere to, including but not limited to the requirement for proposals to be of an appropriate scale of activity, mass, layout, built form, height, materials and character to the area together with a high quality of design without detriment to the amenities of adjoining land users including open spaces or occupiers and their quality of life.
- 5.13 The creation of an independent dwelling within a sustainable, built-up area aligns with the spatial strategy of the Local Plan, which supports the efficient use of land within existing settlements where adequate services and infrastructure are already available. The site is well located in terms of access to public transport, shops, schools, and local facilities, making it an appropriate location for residential accommodation.

5.14 While the site sits on the edge of the settlement, adjoining land of a more open character to the south, it clearly maintains a visual and functional relationship with the built-up area and therefore forms part of the established urban fabric. The development would therefore not represent an encroachment into the countryside, nor would it conflict with the aims of Core Strategy Policy CP11 (Proposals Outside Development Limits), as the proposal remains wholly contained within the existing building and curtilage.

5.15 **Housing supply:** Wokingham Council's most recently published housing land supply was set out in a statement calculating the figure as of 31 March 2025, to be 2.5 years' supply. This deficit is tantamount to a shortage of 3,495 dwellings over this period (including required 5% buffer).

5.16 Paragraph 11.d) of the NPPF sets out that where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, then permission shall be granted unless either:

- i) 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
- 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.

5.17 This is colloquially known as the 'tilted balance'. The judgement of the Court of Appeal in *Gladman Developments Ltd v Secretary of State for Housing, Communities and Local Government [2021] EWCA Civ 104* (03 February 2021) is highly relevant. The judgement sets out that in the exercise of planning judgement, the Council is under a duty to carry out a complete assessment, in which adverse

impacts and benefits are to be fully weighted and considered, taking account of the Framework as a whole in addition to the relevant policies of the Development Plan.

- 5.18 Planning case law, such as *Hallam Land Management Ltd v Secretary of State for Communities and Local Government [2018] EWCA Civ 1808* (para. 47) ('Hallam') (CD5.16), has established that the extent of the housing shortfall has direct relevance to the degree of weight to be given within the tilted balance to the lack of housing supply in favour of granting permission. In this case, the shortfall is 1,403 dwellings.
- 5.19 Footnote 8 of the NPPF clarifies that the definition of out-of-date policies include those for applications involving the provision of housing where the Council cannot demonstrate a five year housing supply.
- 5.20 To conclude, the Council's Housing Supply shortfall is a significant factor in the approach to residential development.
- 5.21 **Sustainable Development:** Paragraph 8 of the NPPF balances the economic, social, and environmental objectives of planning in terms of sustainable development.
- 5.22 Economically, the scheme supports local growth by retaining the existing commercial use at ground floor and making more efficient use of the building through the creation of an independent dwelling above. There would be no loss of active retail space or employment from the proposal, as the ancillary accommodation is surplus to present needs.
- 5.23 Socially, the proposal contributes to the borough's housing supply by creating a self-contained residential unit in a sustainable, accessible location close to shops, services, and public transport. While the flat

lacks private outdoor space, it benefits from proximity to public open spaces such as Dinton Pastures Country Park and the Loddon Valley open space, ensuring adequate access to recreation and amenity.

- 5.24 Environmentally, the proposal reuses an existing building within the settlement boundary, avoiding development on greenfield land and minimising environmental impact. The works are modest and designed to respect the existing built form and local character.
- 5.25 Overall, the development achieves a positive balance across the three dimensions of sustainability identified in paragraph 8 of the NPPF, and therefore represents a sustainable and policy-compliant form of development.
- 5.26 **Dwelling Mix:** As the scheme is designed to utilise the existing building envelope, there is no increase in site density, therefore the scale and massing of development remains unchanged.
- 5.27 The existing internal floor space remains consistent with national space standards for a three bedroom unit, making this proposal a good standard for living conditions.
- 5.28 **Character and Appearance of the Area: CS Policy CP3: General Principles for Development** outlines at point a), that development must be of an appropriate scale of activity, mass, layout, built form, height, materials and character to the area together with a high quality of design.
- 5.29 The site is located within an established mixed-use frontage comprising both residential and commercial properties, generally being 2-storeys in height. The proposed physical works are modest in scale and design, with the introduction of a new external door and staircase. These alterations will integrate seamlessly with the existing site, creating minimal change from an outside view, in terms of

proportions, materials and fenestration pattern. The proposal will retain the mixed-use character of both the existing property and surroundings, therefore having no adverse impact on the visual street scene.

5.30 Overall, the proposed design is sympathetic, proportionate and respectful of the local character, consistent with the objectives of Policy CP3 (General Principles for Development) and the design principles of the NPPF, which encourage high-quality, context-appropriate development that contributes positively to the built environment.

5.31 **Residential Amenity – Prospective Occupants** The internal floor area of the flat meets the Nationally Described Space Standards (NDSS) for a three-bedroom dwelling, providing adequate space for everyday activities, furniture placement, and circulation. All rooms benefit from good levels of natural light and ventilation, supported by the relocation and enlargement of selected windows as shown on the submitted plans (ref: BA0311-04 – proposed plans and elevations).

5.32 The proposed relocation of rear windows to side windows to the residential unit would avoid any overlooking over the rear commercial area.

5.33 The proposed dwelling does not contain a private outdoor amenity space for the residents, reflecting the constraints of the current built form and to most flats in general. This constraint is consistent with the other mixed-use and upper flats along Reading Road, where private garden provision is limited due to the area's urban character.

5.34 Whilst no private amenity space is proposed, the site has strong connections to green public open space, such the large area of open space to the south and west, as well as Lockyer Close Ground to the east, which are both within walking distance. These spaces are easily

accessible through via a pedestrian footpath from Reading Road through Sable Croft. This provides extensive opportunities for future residents at the site to enjoy the benefits garden homes have, including access to green space.

5.35 While Wokingham Borough Council's local standards encourage private amenity space provision, it is recognised that in established built-up areas and involving apartments such as this, flexibility may be applied where suitable alternatives exist. Given the proximity to significant public open spaces and the high standard of internal living accommodation, the proposal is considered to provide an acceptable level of residential amenity consistent with the objectives of Policy TB07 and paragraph 130(f) of the NPPF, which require developments to create a high standard of amenity for existing and future users.

5.36 **Residential Amenity – Neighbouring Occupants:** It is not considered that the proposal would result in any noise or other intensification that would impact upon neighbouring properties, in the context of the existing ancillary use.

5.37 **Transport and Parking:** The application site's location benefits from well served public transport routes, with regular bus services along Reading Road (A329), and easy access to Winnersh Railway Station which has good access routes to London and Birmingham. Overall, the locational sustainability of the site is considered to be very high.

5.38 The proposed apartment would benefit from two off-street parking spaces located at the front of the property, meeting the council's current parking standards for a three bedroom dwelling. Whilst the spaces would be a tandem arrangement, there would be no crossover with the commercial use.

5.39 The commercial element for the shop directly below retains acceptable parking and servicing arrangements, ensuring continued operational functionality.

5.40 **Ecology:** In view of the absence of operational development the proposal is not required to provide an Ecology Survey. Similarly the proposal is exempt from Biodiversity Net Gain through the absence of additional proposed floor space.

5.41 **Flooding:** The site is located within Flood Zone 2. However it involves first floor accommodation and already operated under an ancillary residential use. It is therefore considered that there would be no material changes to flooding impacts.

5.42 **Sustainability and Energy:** Paragraph 8 of the NPPF supports the transition of development to a low carbon future. The national Code for Sustainable Homes has now been abolished, however it is proposed that the development would conform to Part L of the Building Regulations which as of 2022 requires a 30% reduction than current standards. By way of contributing to the reduction in carbon, the proposal would also achieve current building construction standards with added sustainability measures through;

- A. The limitation of the amount of inherent material, structure and embodied energy through the employment of good building standards to create an excellent SAP rating;
- B. Use of locally sourced, recycled materials and labour where practicable;
- C. Reduced internal water consumption of 110 litres per person per day through the incorporation of water efficient sanitary fittings, including low flow toilets and water efficient taps for wash basins;

- D. Refuse and recycling facilities to be provided to work with the Council's existing waste and recycling collection service;
- E. 'A' rated electrical appliances and energy saving light fittings;
- F. 'A' rated double glazed windows with natural cross ventilation provision;
- G. Recycling of waste construction materials where practicable;

5.43 The proposal is therefore considered to comply with sustainability objectives in this respect.

5.44 **Special Protection Area:** The site lies outside of the Thames Basin Heath SPA 7 km buffer zone, and therefore no mitigation is required in this respect.

5.45 **Community Infrastructure Levy (CIL):** As the proposal does not involve the creation of additional floorspace, it is not CIL liable.

6. Conclusion

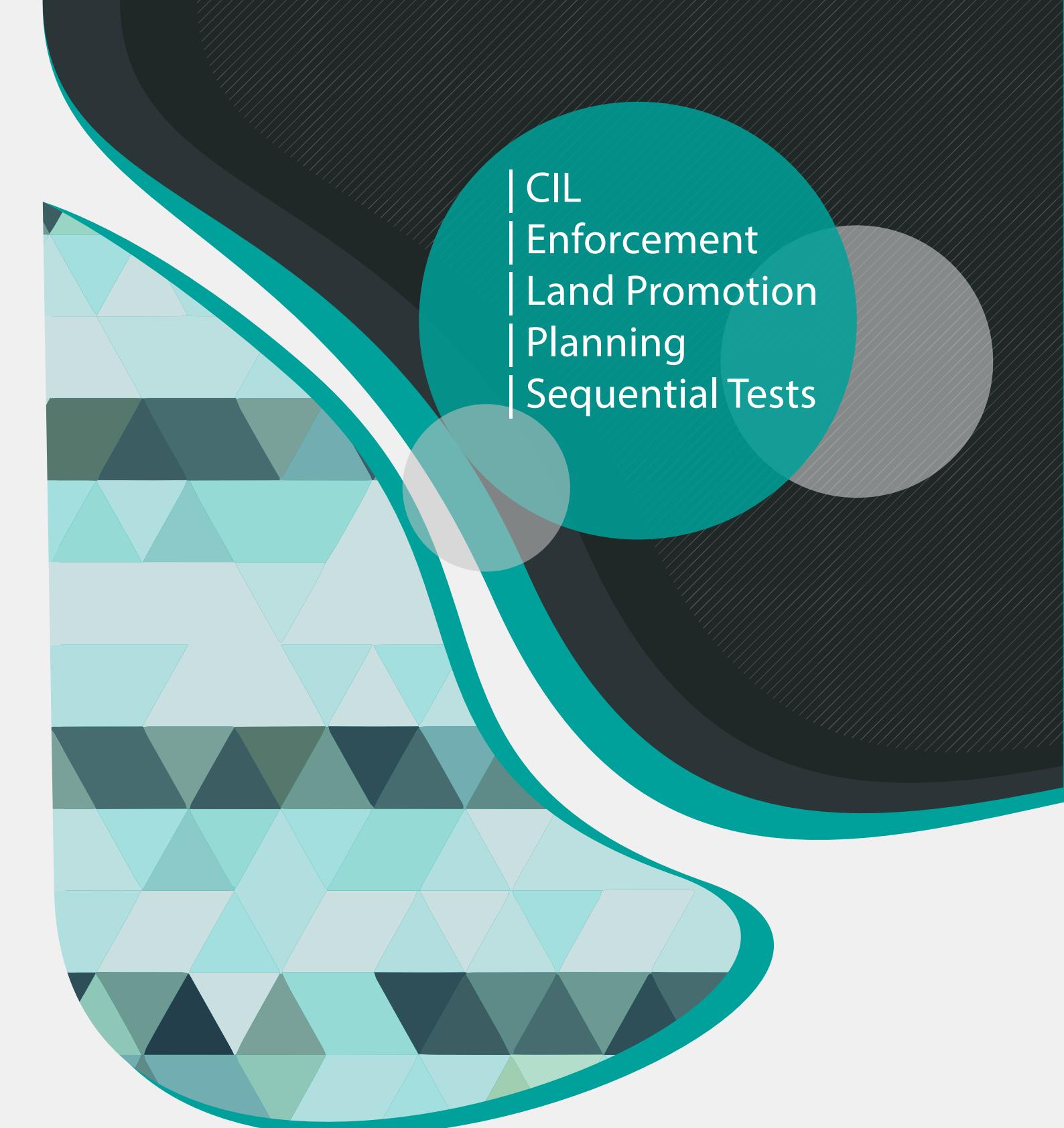
- 6.1 This statement has demonstrated that the proposed development is acceptable in principle and makes an efficient use of land.
- 6.2 The Council is unable to demonstrate a five year supply of housing – the minimum level of housing required. The deficit in supply is half of the total requirement, which highlights serious and substantial shortage.
- 6.3 Material planning considerations have been carefully considered and analysed, as evidenced in section 5 of this statement and the supporting plans and documents. It is considered the proposed development would contribute an appropriate windfall site to the Borough's housing supply, without adverse effect on the character of the area or the amenity of neighbouring residents.
- 6.4 It is considered that the proposed scheme complies with relevant Development Plan Policies and is further supported by National Guidance. Therefore, it is respectfully requested that planning permission is granted.

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