

**PLANNING AND REGULATORY COMMITTEE
6 DECEMBER 2016****PROPOSED CHANGE OF USE FROM MIXED USE D1
(LIBRARIES) AND B1 (OFFICES) TO MIXED USE D1
(LIBRARIES), B1 (OFFICES) AND A2 (FINANCIAL AND
PROFESSIONAL SERVICES) AT REDDITCH LIBRARY, 115,
MARKET PLACE, REDDITCH, WORCESTERSHIRE**

Applicant

Worcestershire County Council

Local Members

Mr A Fry and Ms P Hill

Purpose of Report

1. To consider an application under Regulation 3 of the Town and Country Planning Regulations 1992 for a change of use from mixed use D1 (Libraries) and B1 (Offices) to mixed use D1 (Libraries), B1 (Offices) and A2 (Financial and Professional Services) at Redditch Library.

Background

2. The applicant states that Worcestershire County Council's Libraries and Learning Service has identified a number of approaches to meet its savings targets for 2016/17 and 2017/18, whilst protecting the library service for customers.
3. A key approach to meeting the savings targets is to generate income through sharing library buildings with internal and external organisations. A combination of a reduction in premises costs and the generation of rental income will help to ensure the future of the library service.
4. The applicant states that this approach is part of a broader initiative called the 'One Public Estate Programme', which is delivered through the Cabinet Office and the Local Government Association. The programme provides practical and technical support to public sector organisations who want to share accommodation so that more of their funding can be directed to front line service provision.
5. Worcestershire County Council has already initiated collaborative projects in Worcester, Bromsgrove, Malvern and Stourport where national government agencies have co-located within local authority buildings.
6. This proposal would see a Jobcentre Plus move in to Redditch Library. The activities undertaken by this organisation would be in use class A2 (Financial and Professional Services) meaning that a change of use application is required.

7. In terms of the site's planning history, the Planning and Regulatory Committee granted planning permission for the change of use to a mixed use development at Redditch Library on Tuesday 23 September 2014 (Minute no. 889 refers). The proposals for this application included internal alterations that would facilitate Children's Services service delivery and create office accommodation for Worcestershire County Council staff (possibly including the Citizens Advice Bureau).

The Proposal

8. Worcestershire County Council is seeking permission for a change of use from mixed use D1 (Libraries) and B1 (Offices) to mixed use D1 (Libraries), B1 (Offices) and A2 (Financial and Professional Services) at Redditch Library.

9. The proposal would involve the following elements:

Jobcentre Plus

- A public sector organisation whose activities come under use class A2 (Financial and Professional Services) would move in to Redditch Library. The move would result in 50 additional full-time employees at the site
- The Jobcentre Plus would occupy approximately 426m² of office space on the first and second floors. The office space on the first floor measuring approximately 320m² would be accessible to the public to allow the organisation to provide its service. The second floor office space measuring approximately 106m² would not be accessible to the public

Re-configuration of Library Service

- The library service would have dedicated space on the ground floor and shared space on the first floor totalling approximately 781m² in area. The existing library space measures approximately 905m² in area. This application would, therefore, result in total library space being reduced by roughly 124m². However, the applicant states that they do not expect a reduction in the provision of core library services

Public Meeting Rooms

- A new meeting room would be provided on the ground floor. Existing meeting rooms on the first floor would be relocated to the second floor. The indicative plans indicate that this would result in the provision of 4 publicly accessible meeting rooms

External Changes

- No external changes are proposed.

10. The applicant states that they undertook three consultations at Redditch Library on 30 August 2016, 1 September 2016 and 5 September 2016. Indicative layouts were displayed and each consultation was attended by representatives of Worcestershire County Council's Library Services, Place Partnership and Jacobs UK. Councillors were consulted on 30 August 2016, whilst the public were consulted on 1 September 2016 and 5 September 2016. A number of comments were received and these were included in the applicant's Design and Access Statement accompanying the application.

11. The comments are wide ranging in terms of the issues they cover. The applicant responded to the points in the submission of this application. The following points were raised:

- *Concern over the cost of the changes and naming of the public sector organisation.* The applicant responded that the costs have not been finalised but will be borne by the public sector organisation. The organisation would be named when their governance process allows
- *Concern over a reduction in display areas and quiet study areas.* The applicant responded that an alternative location for displays would be identified. Also, when finalising layout plans, consideration would be given to locating space for private study in quieter areas
- *The library is a victim of council cuts and it is an important public asset.* The applicant responded that the council faces reduced budgets and that spending needs to be reduced to avoid impacting front line services. The libraries service is committed to meeting savings targets whilst protecting services for customers in Redditch
- *The character of the library would be changed to that of an office block.* The applicant responded that they are committed to retaining a light, open and modern feel to the library, and that there is currently underutilised space in the library
- *Concern over a reduction in books and the proportion of library spend being allocated to Redditch.* The applicant responded that all existing shelving can be accommodated to re-configure the library space. Book allocation is determined by a range of factors and the library's share of total book issues, visitors and borrowers. Feedback over the range of stock should be sent to the Local Library manager Teresa Jordan
- *Concern over the reduction in meeting room space for Tai Chi and Mugai Ryu classes.* The applicant responded that they are committed to providing a range of Adult Learning classes at the library to meet local needs. There are no plans to reduce or remove any classes as part of the proposals. The library manager would work with the Adult Learning team to identify a solution to allow the course to continue
- *Concern over worsening of services and security as a result of the changes.* The applicant responded that all services in the library building would work together to ensure security issues are managed to maintain a safe and welcoming environment. The partner organisation may wish to provide security, which will be provided at their expense.

The Site

12. Redditch Library is located in Redditch town centre. The library is located immediately adjacent to the town's market place on Redditch's high street.

13. The site measures approximately 970m² in area.

14. The library is accessible by foot directly off the U31040 (Market Place). In terms of transport, Redditch railway and bus stations are located approximately 0.3 kilometres from the library (approximately a 6 minute walk). Several large car parks serving the adjacent Kingfisher Shopping Centre are also within walking distance of the library. These car parks provide a total of 2500 parking spaces, including disabled spaces. Cycle storage with the capacity for 12 bicycles is provided at the entrance to the library for staff and visitors. The Library is also located approximately 180 metres south of a National Cycle Route, which runs from Bromsgrove Road to Easemore Road before connecting to various Regional Cycle Routes.

15. The site is surrounded by a variety of land uses including Redditch market place to the north, the Kingfisher Shopping Centre to the south, government offices to the east, and a number of smaller shops and convenience stores along Alcester Street to the west. It is understood that there are no residential properties in the immediate vicinity of the library.

16. The site is located in the Redditch Conservation Area.

17. The Library building itself is a three storey structure which was completed in 1976. The building has a reinforced concrete frame and has both its interior and exterior elevations clad in handmade facing brick. The building is fully Disability Discrimination Act 2005 (DDA) compliant.

18. In terms of floorspace, the existing situation on site is approximately as follows:

- Publicly accessible library area: 905m²
- Publicly accessible meeting rooms: 120m²
- Publicly accessible computer area 120m²
- Staff room 56m²
- *Total floorspace* 1201m².

19. The application site falls within Flood Zone 1 (a low risk zone).

Summary of Issues

20. The main issues in the determination of this application:-

- Reduction in Library floorspace
- Location of the development
- Traffic and Highways Safety
- Other Matters.

Planning Policy

National Planning Policy Framework (NPPF)

21. The National Planning Policy Framework (NPPF) was published and came into effect on 27 March 2012. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It constitutes guidance for local planning authorities and decision takers and is a material planning consideration in determining planning applications. Annex 3 of the NPPF lists the documents revoked

and replaced by the NPPF. At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through plan-making and decision-taking.

22. Sustainable Development is defined by five principles set out in the UK Sustainable Development Strategy:

- "living within the planet's environmental limits;
- ensuring a strong, healthy and just society;
- achieving a sustainable economy;
- promoting good governance; and
- using sound science responsibly".

23. The Government believes that sustainable development can play three critical roles in England:

- an economic role, contributing to a strong, responsive, competitive economy
- a social role, supporting vibrant and healthy communities and
- an environmental role, protecting and enhancing our natural, built and historic environment.

24. The following guidance contained in the NPPF is considered to be of specific relevance to the determination of this planning application:-

Section 2: Ensuring the vitality of town centres

Section 4: Promoting sustainable transport

Section 7: Requiring good design

Section 8: Promoting healthy communities

Section 12: Conserving and enhancing the historic environment

The Development Plan

25. The Development Plan is the strategic framework that guides land use planning for the area. In this respect the current Development Plan consists of the Borough of Redditch Local Plan No. 3 2006.

26. Planning applications should be determined in accordance with the provisions of the Development Plan unless material considerations indicate otherwise. The NPPF is a material consideration in planning decisions.

Borough of Redditch Local Plan No.3 2006

Policy CS.5 Achieving Balanced Communities

Policy CS.7 The Sustainable Location of Development

Policy B(BE).13 Qualities of Good Design

Policy B(BE).14 Alterations and Extensions

Policy B(BE).28 Waste Management

Policy E(TCR).1 Vitality and Viability of the Town Centre

Policy E(TCR).4 Need and the Sequential Approach

Policy C(CF).1 Community Facilities

Policy C(T).12 Parking Standards

Draft Borough of Redditch Local Plan No. 4

27. The Borough of Redditch Local Plan No.4 (BORLP4) will outline the strategic planning policy framework for guiding development in the Borough of Redditch up to 2030. It will set a long-term spatial vision and will include strategic objectives, a spatial strategy, core policies, strategic and non-strategic site allocations, and a monitoring and implementation framework. The Plan includes the Redditch Cross Boundary Development Policy (Policy RCBD1), which also appears in the Draft Bromsgrove District Plan.

28. Redditch Borough Council submitted the Draft BORLP4 to the Secretary of State for independent examination in March 2014. The Secretary of State has appointed an independent Inspector (Mr Michael J Hetherington) to undertake an independent examination into the soundness of the plan. BORLP4 and the Draft Bromsgrove District Plan examinations are being held concurrently and have included several joint hearing sessions as well as separate hearing sessions relating to each Local Plan. Hearing sessions commenced June 2014 and ran until March 2016.

29. The Inspector published a list of proposed Main Modifications to the submitted BORLP4 which he considered were required to make the plan sound. The Inspector's proposed Main Modifications were published for an eight week consultation from 27 July to 21 September 2016.

30. The Examination formally remains open until the Inspector issues his binding report and it is possible that further hearings could be held if the Inspector chooses to do so. In the circumstances the BORLP4 cannot yet be declared sound and cannot be adopted. It is not yet, therefore, part of the development plan. However, having regard to the advice in the NPPF, Annex 1, it is the view of the Head of Strategic Infrastructure and Economy, that whilst full weight cannot be attached to the BORLP4, significant weight should be attached to the BORLP4 in the determination of this application. The draft BORLP4 policies that are relevant to the proposal are listed below:

- Policy 1 Presumption in Favour of Sustainable Development
- Policy 2 Settlement Hierarchy
- Policy 5 Effective and Efficient Use of Land
- Policy 15 Climate Change
- Policy 20 Transport Requirements for New Development
- Policy 30 Town Centre and Retail Hierarchy
- Policy 31 Regeneration for the Town Centre
- Policy 36 Historic Environment
- Policy 37 Historic Buildings and Structures
- Policy 38 Conservation Areas
- Policy 39 Built Environment

Consultations

31. **County Councillor Pattie Hill** comments that it is good to see this application coming forward.

32. **Redditch Borough Council** has no objections.

33. **The County Ecologist** has no objections on the understanding that no external alterations to the building would take place, including works within roof voids or soffits.

34. **The County Highways Officer** has no objections.

35. **The County Landscape Officer** has no objections.

36. **Hereford and Worcester Fire and Rescue Service** have no objections.

37. **West Mercia Police** have no objections. They comments that the internal security of the building would need further thought. Further advice could be provided if the public sector organisation's work was known.

38. **Worcestershire Regulatory Services** have no objections.

39. **Worcestershire County Council's Sustainability Team** have the following comments:

- They would like to see all areas of the building utilising energy efficient lighting and equipment to limit energy demands
- They would like to see that the new provider area of the building is sub metered to allow for accurate accounts of energy use for reporting purposes and accurate billing.

Other Representations

40. The application has been advertised in the press and on site. Two letters of representation have been received stating objections to the proposal. In summary, the letters contained the following points:

- No mention of the "flawed" 2014 application where a change of use was passed
- Concerns raised about arrangements for the storage and collection of waste for all organisations that are going to occupy the building
- Will the site be connecting to the existing drainage system?
- Concerns that the Design and Access Statement did not make it clear that the plans displayed at the public consultation were only indicative and may not be used
- Objection to the loss of the large meeting rooms which have been used by the Redditch Local History Society for several years. The monthly meetings attract 60 attendees and no provision has been made for meetings of this size in the proposed layout. The proposed meeting rooms are only small/medium sized. The Society accepts change is necessary for financial reasons but hope the changes do not result in degradation of library services, or, the unacceptable loss of a meeting space capable of holding up to 100.

The Head of Strategic Infrastructure and Economy's Comments

41. As with any planning application, this application should be determined in accordance with the provisions of the Development Plan unless material considerations indicate otherwise. The relevant policies and key issues have been set out earlier.

Reduction in Library floorspace

42. The applicant is proposing to move a Jobcentre Plus in to Redditch Library. The applicant states that the co-location would support the library service in meeting its savings targets, whilst protecting the library service for customers. The organisation would occupy approximately 426m² of office space on the first and second floors. This would necessitate a reduction in overall library floorspace from approximately 905m² to 781m². The applicant states that there would not be a reduction in the provision of core library services.

43. In terms of consultees, County Councillor Hill welcomes the application and Redditch Borough Council have no objections.

44. A letter of representation stated an objection to the loss of the existing large meeting rooms at the library. The letter stated that the proposed small-medium sized meeting rooms would not be sufficient to host monthly meetings attracting 60 or more attendees.

45. In terms of the development plan, Policy CS.5 (Achieving Balances Communities) of the Borough of Redditch Local Plan No.3 2006 states that proposals helping to sustain and improve the balance of community and social facilities should maximise the use of existing infrastructure. Further to this, Policy C(CF).1 (Community Facilities) indicates that proposals for the development of community facilities will be permitted where they would not adversely affect the functioning of that facility.

46. The Head of Strategic Infrastructure and Economy considers that co-locating a Jobcentre Plus at Redditch Library would assist the applicant in meeting their savings targets and protecting the library service. However, it is important that the co-location would not compromise the full provision of the existing library service or community facilities.

47. The applicant's statement that there would not be a reduction in the provision of core library services and consideration of the indicative plans is considered to mitigate the concerns over the reduction in library space sufficiently.

48. In terms of the concerns expressed about the potential loss of a large meeting space, the applicant states that Redditch Library have a positive and active relationship with the Redditch Local History Society and that they do not anticipate any reduction in facilities available for the Society as a result of the proposal. Furthermore, the applicant states that the Society currently hold their monthly meetings in a meeting room measuring approximately 54m² and that a meeting room would be available for them following the proposed changes that would measure about 58m². There have also been no instances in the past three years where a community hirer has required seating for 100 people. The applicant, therefore, considers that the proposed changes would more than meet the current provision. In

view of these comments, the Head of Strategic Infrastructure and Economy considers that the concerns over the potential loss of a large meeting space can be mitigated for adequately.

49. On balance, the Head of Strategic Infrastructure and Economy considers that the proposal would accord with policies CS.5 and C(CF).1, and would be acceptable in terms of a reduction in library floorspace.

Location of the development

50. The applicant is proposing a change of use that would involve use class A2 (Financial and Professional Services) development being located at Redditch Library in Redditch Town Centre.

51. In terms of the development plan, Policy CS.7 (The Sustainable Location of Development) of the Borough of Redditch Local Plan No.3 2006 states that uses attracting a lot of people will be directed to the town centre, primarily on previously developed (brownfield) land. Policy E(TCR).1 (Vitality and Viability of the Town Centre) indicates that the town centre should be the primary focus for commercial and public office development and that the diversification of the town centre should be promoted to provide mixed use areas.

52. The applicant states that the proposal would result in an additional 50 full-time employees working at the Redditch Library site. Furthermore, the Jobcentre Plus's activities would involve face to face meetings with members of the public at the site. In view of this, the Head of Strategic Infrastructure and Economy considers that the proposed development would accord with Policy CS.7 because the change of use would involve large numbers of employees and the public coming to Redditch Library, which is also a previously developed site. Further to this, the Head of Strategic Infrastructure and Economy considers that the proposal would accord with Policy E(TCR).1 because the use class would involve the establishment of public offices in Redditch town centre. The Head of Strategic Infrastructure and Economy therefore considers that the proposal would be acceptable in terms of the location of the development.

Traffic and Highways Safety

53. The proposal would involve an additional 50 full-time employees being located at Redditch Library. The Jobcentre Plus that would co-locate at the Library would undertake activities involving meeting members of the public. No external changes to the Library are proposed.

54. The County Highways Officer has no objections.

55. In terms of the development plan, Policy CS.7 indicates that development attracting large numbers of people should be directed to the town centre because town centre locations allow people to make good use of public transport and provide opportunities for linked journeys (i.e. a secondary journey that follows a primary journey, often for another purpose).

56. The Head of Strategic Infrastructure and Economy considers that the proposal would be located in a sustainable location in terms of traffic and highways safety. The development would provide multiple opportunities for multiple modes of transport. Furthermore, the County Highways Officer has no objections. In view of this, the

Head of Strategic Infrastructure and Economy considers that the proposal would accord with Policy CS.7 and would, therefore, be acceptable in terms of traffic and highways safety.

Other Matters

57. The County Planning Authority received one letter of representation objecting to the proposal. In terms of planning, the letter raised concerns regarding arrangements for the storage and collection of waste for all organisations that would occupy the building, whether the site would connect to the existing drainage system, and concerns that the plans provided with this application are only indicative. These points shall be addressed in turn:

Storage and collection of waste

58. The applicant states that the development would make use of the existing waste arrangements in place at Redditch Library, which are sufficient. The applicant states that the amount of waste is unlikely to change dramatically. They also state that the waste from the Jobcentre Plus would be more likely to be confidential and, therefore, handled by a specialist waste organisation, which would reduce demand on regular waste management services.

59. Policy B(BE).28 (Waste Management) of the Borough of Redditch Local Plan No.3 2006 seeks to minimise waste through re-use, retention and recycling.

60. The Head of Strategic Infrastructure and Economy considers that the existing arrangements at the site would be sufficient in terms of the development plan.

Drainage

61. In terms of drainage, no external changes are proposed. The applicant states that there would only be minor internal alterations. In view of this, the Head of Strategic Infrastructure and Economy considers that the existing drainage arrangements at Redditch Library would be sufficient.

Indicative Plans

62. Indicative plans were displayed at public consultations described in paragraph 10 of this report. The plans state that they are indicative internal layouts. The County Planning Authority advised the applicant to submit indicative floorplans with their proposal at a pre-application meeting on 11 May 2016. This was to allow the applicant a degree of practical flexibility in their internal arrangements if planning permission were to be granted.

63. In terms of the concern set out in the letter of representation, the Head of Strategic Infrastructure and Economy considers that the reduction in library floorspace would be acceptable in view of the applicant's statement that there would be no reduction in the provision of core library services.

Conclusion

64. The proposal is for a change of use application to enable use class A2 (Financial and Professional Services) activities to take place at Redditch Library. The change of

use would involve a Jobcentre Plus co-locating to Redditch Library, which would necessitate a reduction in overall library floorspace.

65. The proposal would be acceptable in terms of the overall loss of floorspace in accordance with Policies CS.5 and C(CF).1 because the applicant states that there would be no reduction in the provision of core library services. Furthermore, the proposal would contribute to protecting the library service by assisting the applicant in meeting their savings targets.

66. The proposal would be acceptable in terms of the location of the development because Policies CS.7 and E(TCR).1 direct development that would attract large numbers of people and public office provision respectively towards Redditch town centre. Policy CS.7 also indicates that the proposal would be acceptable in terms of traffic and highways safety because Redditch Library is located in a sustainable town centre location.

67. In terms of other matters, the Head of Strategic Infrastructure and Economy that arrangements for waste, drainage and the indicative plans are acceptable in terms of the development plan.

68. Taking in to account the provisions of the Development Plan and in particular Policies CS.5, CS.7, B(BE).13, B(BE).14, B(BE).28, E(TCR).1, E(TCR).4, C(CF).1 and C(T).12 of the Borough of Redditch Local Plan No.3 2006 and Policies 1, 2, 5, 15, 20, 30, 31, 36, 37, 38 and 39 of the Draft Borough of Redditch Local Plan No. 4, it is considered the proposal would not cause demonstrable harm to the interests intended to be protected by these policies or highway safety.

Recommendation

69. The Head of Strategic Infrastructure and Economy recommends that planning permission be granted for a change of use from mixed use D1 (Libraries) and B1 (Offices) to mixed use D1 (Libraries), B1 (Offices) and A2 (Financial and Professional Services) at Redditch Library, subject to the following conditions:

- a) The development must be begun not later than the expiration of three years beginning with the date of this permission;**
- b) The permission enures for the benefit of Worcestershire County Council only; and**
- c) The development hereby permitted shall be carried out in accordance with the drawing titled "Location Plan" (Ref. BW 20013L/R/PL 01).**

Contact Points

County Council Contact Points

County Council: 01905 763763

Worcestershire Hub: 01905 765765

Email: worcestershirehub@worcestershire.gov.uk

Specific Contact Points for this report

Case Officer: Joshua Scholes, Planning Officer

Tel: 01905 844485

Email: jscholes@worcestershire.gov.uk

Mark Bishop, Development Control Manager

Tel: 01905 766709

Email: mbishop@worcestershire.gov.uk

Background Papers

In the opinion of the proper officer (in this case the Head of Strategic Infrastructure and Economy) the following are the background papers relating to the subject matter of this report:

The application, plans and consultation replies in file reference 16/000023/REG3.