



Town Planning Bureau

The Barn • 43 Oakdene Road • Redhill • Surrey • RH1 6BT
tel: 01737 390169 email: info@tpbureau.co.uk

PLANNING STATEMENT

Site: 1-15 Queen Victoria Street / 145-148 Friar
Street, Reading RG1 1SY

Application by: Thackery Estates

Lead Consultant: Mr Paul S Bottomley

Date: 28th March 2024

Our Ref: URB-482b-ST8

Copyright Notice.

This document and its content are the property of Town Planning Bureau © Urbanistica Ltd 2009. All right reserved. Any redistribution or reproduction of part or all of the contents in any form is prohibited other than the following:

- You may print for your personnel use only.

You may not, except with our permission, distribute or commercially exploit the content. Nor may you transmit or store in any other form.

1.	Introduction	2
2.	Site Location and Description	14
3.	Relevant Planning History	16
4.	Proposals.....	17
5.	Relevant Planning Policy and Legislation.....	24
6.	Proposed Changes.....	25
7.	Planning Considerations	29
8.	Summary & Conclusions.....	57

1.0 Introduction

- 1.1 This planning statement is prepared by Mr Paul S Bottomley BA (Hons), MA, MRTPI of Town Planning Bureau and is presented in support of a planning application under Section S73 of the Town and Country Planning Act 1990 for a material amendment to planning permission ref: 221232 and new listed building consent ref: 221233 (“the application”).

- Applicant: Thackery Estates Reading Investments Ltd (“the Applicant”).
- Site: 1-15 Queen Victoria Street / 145-148 Friar Street, Reading RG1 1SY (“the site”).
- LPA: Reading Borough Council (“the Council”).

- 1.2 We should be grateful if you would give full consideration to the matters set out below.

Background

- 1.3 Planning permission (ref: 221232) and listed building consent (ref: 221233) has been approved, as well as a subsequent demolition consent (ref: 231223) for buildings to the rear of 1-15 Queen Victoria Street (“QVS”) and 146-148 Friar Street ((including 145) “Friar Street”). First phase demolition works have been undertaken, which have allowed a thorough understanding of the site, the land, and the existing buildings to be retained at this juncture. Further, the repair works to the gables and roof, as well as changes to scaffolding have been completed.

- 1.4 The Applicant has completed a tendering process of the approved scheme as well as completed extensive marketing of the proposed retail and apart-hotel scheme - the Council have been provided with this information throughout the process. The tendering has established two key principles:

- The cost to complete the works is significantly greater than the initial cost estimates play produced prior to submission of the application - this means the scheme as approved is unviable.
- The second major concern is that the market interest in occupying the retail units as approve is not there, especially at a rate that could assist with viability.

This means the scheme, as approved is not viable to build and even if built, the market interest shows that the units presented would not be occupied. Therefore, the Applicant’s lender unsurprisingly will not support nor fund such risk.

- 1.5 The Applicant has faith in the overall proposal and has worked extensively to establish what will be attractive to the market and also, how cost efficiencies can be made to establish a viable scheme. The Applicant has entered into extensive pre-application discussions with the Council, which has seen the scheme evolve - the cumulation of the pre-app is summarised in the planning history section.

- 1.6 Therefore, the amended scheme that is presented by this amendment presents and retains the key benefits of the approved scheme but in a more viable and market aligned scheme. The amendments to the scheme fall within the scope envisaged by Section 73 are not of a level to warrant the submission of a new full planning application.

Amended Scheme

- 1.7 This section 73 application is sought for material changes to planning permission ref: 221232 and listed building consent 221233, for the conservation, enhancement and regeneration of this important town centre site that lays at the gateway to the primary shopping area of Reading when accessing from the main line railway station.
- 1.8 The scheme is still proposing a mixed-use scheme comprising a public courtyard, retail and apart-hotel that will bring largely vacant and dilapidated site back into viable use, including the restoration and secured longevity of the Listed Buildings. For note, there is no change needed to the description of development as the scheme proposed simply makes modest amendments.
- 1.9 In summary, the primary changes to the scheme are:
- Ground floor:
 - changes to the QVS Class E units - the quantum of floorspace will remain the same with a modest reduction in number of units to provide more units desired by the market (existing has four and reduced to three).
 - Friar Street Class E units will be increased in size to provide more floorspace.
 - there will also be changes to the apart hotel lobby and all public access will be from QVS.
 - First floor:
 - improved efficient of this floor including changes to the stairs, lift core, increase in rooms (+) but reduction in built form to rear of No.146 and 11-15 QVS.
 - Second floor:
 - improved efficient of this floor including changes to the stairs, lift core, increase in rooms (+) but reduction in built form to rear of No.146 and change to 11-15 QVS.
 - Third floor:
 - improved efficient of this floor including changes to the stairs, lift core, increase in rooms (+) but reduction in built form to rear of No.146 and change to 11-15 QVS.
 - Fourth floor:
 - improved efficient of this floor including changes to the stairs, lift core, increase in rooms (+) but reduction in built form to rear of No.146 and dormers to Nos.145-147.
 - Roof plan:
 - Changes to take account of modest massing changes, but plant zone to remain same.
 - Basement:
 - Modest change to No.146 basement to take account of improved lift and stair core.

- 1.10 A comparison of the as approved versus as proposed in contained in Section 6 of this statement and the DAS.

Decision & Conditions

- 1.11 The description of development will remain:

Demolition of No. 146 Friar St and structures to rear and partial demolition of No. 145 Friar St and various external works to other existing buildings, as part of redevelopment to provide: reconfigured basement and ground floor uses (Class E(a) or (b)) on Friar St and Queen Victoria St frontages and proposed apart-hotel (Class C1) at part-basement, part-ground and on all upper floors; part-two, part- three storey rear extension to No's 5-15 (odd) Queen Victoria St; replacement basement and five storey building at No. 145 Friar St and two-storey roof extension to No. 146 Friar St; proposed public courtyard accessed via Queen Victoria St walkway; roof level plant; and various other associated works. At: 1-15 Queen Victoria Street & 145-148 Friar Street Reading.

- 1.12 There will however be modest changes to the conditions, for ease these are presented in the table below.

Con	Description	Type	Amendment
1	The development hereby permitted shall begin no later than three years from the date of this planning permission.	Compliance	No Change
2	The development hereby permitted shall ONLY be carried out in accordance with the following approved plans:	Compliance	Drawings to be changed as per table para.1.23
3	No development, barring any demolition works and any repair works to the 12 roof level gables at 1-15 Queen Victoria Street and 148 Friar Street (as per approved plans: P22018-FCH-BA-XX-DR-A-1140 Rev P01 - Existing Elevation 01; P22018-FCH-BA-XX-DR-A- 1450 Rev P01 - Demolition Elevation 01; P22018-FCH-BA-XX-DR-A-1400 Rev P01 - Proposed Elevation 01, as all received on 26/08/2022), shall commence until a schedule of all materials to be used in the construction of the external surfaces of the development have been submitted to and approved in writing by the Local Planning Authority. Details shall include manufacturer's specification details of all external facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site - approved details to then be retained on site throughout the duration of the construction of the development). The development shall be carried out and thereafter maintained in accordance with the details approved.	Pre-Commencement	Drawing refs to be changed
4	No development shall commence on site, including any works of demolition and any preparatory works but with the specific exception of repair works to the 12 roof level gables at 1-15 Queen Victoria Street and 148 Friar Street (as per approved plans: P22018-FCH-BA-XX- DR-A-1140 Rev P01 - Existing Elevation 01; P22018-FCH-BA-XX-DR- A-1450 Rev P01 - Demolition Elevation 01; P22018-FCH-BA-XX-DR-A-1400 Rev P01 - Proposed Elevation 01, as all received on 26/08/2022) and the demolition to ground level of No 146 Friar Street and inward facing buildings within the application site (as shown on approved plans P2218-FCH-BA-00-DR-A-1320 Rev P01 - Pre Commencement Demolition Ground floor, P22018-FCH-BA-01-DR-A-1321 Rev P01 - Pre Commencement Demolition First floor, P22018-FCH-BA-02-DR-A-1322 Rev P01 - Pre Commencement Demolition Second floor, P22018-FCH-BA-03-DR-A-1323 Rev P01 - Pre Commencement Demolition Third floor, P22018-FCH-BA-B1-DR-A-1324 Rev P01 - Pre Commencement Demolition Basement, P22018-FCH-BA-XX-DR-A-1420 Rev P01 - Pre Commencement Demolition Elevation 01, P22018-FCH-BA-XX-DR-A-1421 Rev P01 - Pre Commencement Demolition Elevation 02, P22018-FCH-BA-XX-DR-A-1422 Rev P01 - Pre Commencement Demolition Elevation 03, as all received on 13/04/2023, and P22018-FCH-BA-XX-DR-A- 1520 Rev P01 - Pre-Commencement Demo Section 01, P22018-FCH-BA-XX- DR-A-1521 Rev P01 - Pre-Commencement Demo Section	Pre-Demolition	Drawing refs to be changed

	02, P22018-FCH-BA-XX- DR-A-1522 Rev P01 - Pre-Commencement Demo Section 03, P22018-FCH-BA-XX- DR-A-1523 Rev P01 - Pre-Commencement Demo Section 04, as all received on 10/05/2023), before a contract for the carrying out of the works of redevelopment of the site, up to and including at least the demolition and proposed shell and core stages, has been made, as confirmed in details to be submitted to and approved in writing by the Local Planning Authority.		
5	No development shall commence on site, including any works of demolition and any preparatory works in relation to (i) works to the 12 roof level gables at 1-15 Queen Victoria Street and 148 Friar Street and (ii) all other component parts of the proposed development, until details of the recording of the existing buildings at the site, following as a minimum the Level 2 guidance set out in "Understanding Historic Buildings, A Guide to Good Practice" (Historic England 2016) (or any document which supersedes this document), are submitted to and approved in writing by the Local Planning Authority.	Pre-Demolition	Already Discharged
6	No development shall commence on site, including any works of demolition and any preparatory works in relation to (i) works to the 12 roof level gables at 1-15 Queen Victoria Street and 148 Friar Street and (ii) all other component parts of the proposed development, until a site specific Demolition and Construction Method Statement (DCMS) has been submitted to and been approved in writing by the Local Planning Authority. As well as demonstrating a commitment to ensuring the number of HGV movements are managed and controlled, the DCMS must demonstrate that appropriate measures will be implemented to ensure the safety of pedestrians and cyclists around the demolition and construction site as well as ensuring demolition and construction works are coordinated with other developments within the vicinity of the site.	Pre-Demolition	Already Discharged
7	Prior to first occupation of the apart-hotel hereby approved, the bicycle parking facility for the apart-hotel shall be provided in accordance with the plans hereby approved (P22018-FCH-BA-00-DR-A-1300 Rev P02 - Proposed Ground Floor Plan, as received 02/11/2022). The facility shall be kept available for bicycle parking at all times thereafter.	Compliance	Drawing refs to be changed
8	Prior to first occupation of the apart-hotel hereby approved, details of how refuse and recycling collections will be managed from the site (including vehicles, servicing and deliveries), shall be submitted to and approved in writing by the Local Planning Authority. Thereafter refuse collection, servicing and deliveries will be carried out fully in accordance with the approved details.	Pre-Occupation	No Change
9	Deliveries and servicing of the development shall only be undertaken in accordance with the approved Delivery and Servicing Plan (Delivery and Servicing Plan by Mode Transport Planning Ref 325429 V2.3 dated August 2022, as received 26/08/2022) to ensure vehicles access the site without creating safety concerns and congestion based on the anticipated number of vehicle trips.	Compliance	No Change
10	The glazing, ventilation and any other mitigation specified shall be installed in accordance with the specifications recommended within the Noise Assessment submitted with the application (Noise Impact Assessment Report by KP Acoustics Ref 21827.NIA.01 Rev D dated 16/11/2022, as received on 21/11/2022)	Compliance	No Change
11	Prior to the installation of any externally-located mechanical plant a noise assessment of the proposed mechanical plant shall be submitted and approved by the Local Planning Authority. The assessment shall be carried out for in accordance with BS4142:2014+A1:2019 methodology. The predicted specific sound level (LAeq,TR) (with reference to BS:4142) as measured at a point 1 metre external to the nearest noise-sensitive facade shall be at least 5dB below the pre-existing background sound level, LA90,T when all plant/equipment (or any part of it) is in operation. The predicted rating level, LAr,Tr (specific sound level plus any adjustment for the characteristic features of the sound) as measured at a point 1 metre external to the nearest noise- sensitive façade (habitable window of a dwelling) shall not exceed the pre-existing background sound level, LA90,T when all plant/equipment (or any part of it) is in operation. The plant shall thereafter only be installed in accordance with the assessment and shall thereafter be maintained so that it operates to the same standard.	Pre-Installation	No Change
12	Prior to the first occupation of the apart-hotel use hereby approved, a noise assessment shall be submitted to and approved, in writing, by the Local Planning Authority. The noise assessment shall include an assessment of the noise environment within the ancillary gym and inclusion of any required mitigation measures (including to the internal structure of the unit itself) to protect nearby occupiers from noise and disturbance, including structure borne noise. The scheme itself shall be designed, specified and constructed so that the sound insulation performance of the resultant structure is such that the indoor ambient noise levels within adjoining and nearby premises do not exceed the appropriate values for the use of the premises detailed in Table 4 of	Pre-Occupation	No Change

	BS 8233:2014 as a result of noise from the ancillary gym and the impact noise does not cause disturbance to occupiers. Thereafter, the development shall not be carried out other than in accordance with the approved scheme which shall be completed before the first occupation of the apart-hotel use, and retained / maintained as such thereafter.		
13	Prior to the first occupation of the apart-hotel use hereby approved an odour assessment shall be carried out and a detailed odour management plan to include scaled plans, odour control specifications and a maintenance plan shall be submitted to and approved in writing by the Local Planning Authority. Reference shall be made to the EMAQ guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems (Sept 2018) when assessing potential odours and selecting appropriate odour control methods. When assessing potential odours, the assessment shall consider the full range of cooking types that may be conducted under the permitted use. Thereafter, the development shall not be carried out other than in accordance with the approved scheme with any measures completed prior to the first occupation of the apart-hotel and retained / maintained as such thereafter.	Pre-Occupation	No Change
14	No development shall commence on site, including demolition and any preparatory works but with the specific exception of repair works to the 12 roof level gables at 1- 15 Queen Victoria Street and 148 Friar Street (as per approved plans: P22018-FCH-BA- XX-DR-A-1140 Rev P01 - Existing Elevation 01; P22018-FCH-BA-XX-DR-A-1450 Rev P01 - Demolition Elevation 01; P22018-FCH-BA-XX-DR-A-1400 Rev P01 - Proposed Elevation 01, as all received on 26/08/2022), until an assessment of the nature and extent of contamination has been submitted to and been approved in writing by the Local Planning Authority. This assessment must be undertaken by a competent person, and shall assess any contamination on the site, whether or not it originates on the site. Moreover, it must include:	Pre-Demolition	Already Discharged
15	No development shall commence on site, including demolition and any preparatory works but with the specific exception of repair works to the 12 roof level gables at 1- 15 Queen Victoria Street and 148 Friar Street (as per approved plans: P22018-FCH-BA- XX-DR-A-1140 Rev P01 - Existing Elevation 01; P22018-FCH-BA-XX-DR-A-1450 Rev P01 - Demolition Elevation 01; P22018-FCH-BA-XX-DR-A-1400 Rev P01 - Proposed Elevation 01, as all received on 26/08/2022), until a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment has been submitted to and been approved in writing by the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, an appraisal of remedial options, and proposal of the preferred option(s), and a timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.	Pre-Demolition	Already Discharged
16	The approved remediation scheme under Condition 15 shall be implemented in accordance with the approved timetable of works. A validation report (that demonstrates the effectiveness of the remediation carried out) shall be submitted to and approved by the Local Planning Authority before construction above foundation level.	Compliance	No Changed
17	In the event that contamination is found at any time when carrying out the approved development not previously identified, development shall be halted on that part of the site and the contamination reported in writing to the Local Planning Authority.	Compliance	No Change
18	No construction, demolition or associated deliveries shall take place outside the hours of 08:00 to 18:00 hours Mondays to Fridays, and 09:00 to 13:00 hours on Saturdays, and not at any time on Sundays and Bank or Statutory Holidays without prior written approval from the Local Planning Authority.	Compliance	No Change
19	No materials or green waste produced as a result of the clearance of the site, demolition works or construction works associated with the development hereby approved shall be burnt on site.	Compliance	No Change
20	Prior to the first occupation of the apart-hotel use hereby approved details of measures to prevent pests and vermin accessing the bin store(s) shall be submitted to and approved in writing by the Local Planning Authority. The approved bin storage, including pest and vermin control measures, shall be provided in accordance with the approved details prior to first occupation of the apart-hotel and shall not be used for any purpose other than bin storage at all times thereafter.	Pre-Occupation	No Change
21	No development shall commence on site, barring any demolition works and any repair works to the 12 roof level gables at 1-15 Queen Victoria Street and 148 Friar Street (as per approved plans: P22018- FCH-BA-XX-DR-A-1140 Rev P01 - Existing Elevation 01; P22018-FCH-BA- XX-DR-	Pre-Commencement	Drawing refs to be changed

	A-1450 Rev P01 - Demolition Elevation 01; P22018- FCH-BA-XX-DR- A-1400 Rev P01 - Proposed Elevation 01, as all received on 26/08/2022), until a Sustainable Drainage Strategy and associated detailed design, management and maintenance plan of surface water drainage for the site using SuDS methods has been submitted to and approved in writing by the Local Planning Authority.		
22	Prior to the first occupation of the apart-hotel hereby permitted, the sustainable drainage scheme for the site shall be completed in accordance with the approved strategy to be submitted pursuant to condition number 21. The sustainable drainage scheme shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan.	Compliance	No Changed
23	a) No development, barring any demolition works to ground level and any repair works to the 12 roof level gables at 1-15 Queen Victoria Street and 148 Friar Street (as per approved plans: P22018- FCH-BA-XX-DR-A-1140 Rev P01 - Existing Elevation 01; P22018-FCH-BA- XX-DR-A-1450 Rev P01 - Demolition Elevation 01; P22018-FCH-BA-XX- DR- A-1400 Rev P01 - Proposed Elevation 01, as all received on 26/08/2022), shall take place until the applicant or their agents or successors in title have secured the implementation of a programme of archaeological field evaluation in accordance with a Written Scheme of Investigation, which has been submitted to and approved in writing by the Local Planning Authority. b) The results of the evaluation will inform the preparation of a subsequent mitigation strategy which will be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the development, barring any demolition works to ground level. The mitigation strategy will provide for:	Pre-Commencement	Drawing refs to be changed
24	No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.	Pre-Commencement	No Changed
25	No development, barring any demolition works and any repair works to the 12 roof level gables at 1-15 Queen Victoria Street and 148 Friar Street (as per approved plans: P22018-FCH-BA-XX-DR-A-1140 Rev P01 - Existing Elevation 01; P22018-FCH-BA-XX-DR-A- 1450 Rev P01 - Demolition Elevation 01; P22018-FCH-BA-XX-DR-A-1400 Rev P01 - Proposed Elevation 01, as all received on 26/08/2022), shall commence on site until a comprehensive scheme of hard and soft landscaping has been submitted to and approved in writing by the Local Planning Authority. These details shall include:	Pre-Commencement	Drawing refs to be changed
26	No development shall commence on site, barring any demolition works and any repair works to the 12 roof level gables at 1-15 Queen Victoria Street and 148 Friar Street (as per approved plans: P22018- FCH-BA-XX-DR-A-1140 Rev P01 - Existing Elevation 01; P22018-FCH-BA- XX-DR-A-1450 Rev P01 - Demolition Elevation 01; P22018- FCH-BA-XX-DR- A-1400 Rev P01 - Proposed Elevation 01, as all received on 26/08/2022), until a scheme detailing the locations, elevations, specifications and subsequent maintenance of biodiversity enhancements, including log piles, integral bird nesting and bat roosting features, is submitted to and approved in writing by the Local Planning Authority. The measures shall be implemented in accordance with the approved scheme prior to the first occupation of the apart-hotel and shall be maintained as such thereafter.	Pre-Commencement	Drawing refs to be changed
27	No development shall commence on site, barring any demolition works and any repair works to the 12 roof level gables at 1-15 Queen Victoria Street and 148 Friar Street (as per approved plans: P22018- FCH-BA-XX-DR-A-1140 Rev P01 - Existing Elevation 01; P22018-FCH-BA- XX-DR-A-1450 Rev P01 - Demolition Elevation 01; P22018- FCH-BA-XX-DR- A-1400 Rev P01 - Proposed Elevation 01, as all received on 26/08/2022), until details of the measures to be incorporated into the development to demonstrate how a full and robust access control strategy will be achieved has been submitted to and approved in writing by the Local Planning Authority. This shall include but not be limited to policies and procedures to identify and manage the access into the courtyard and the operational timings of the gates from Queen Victoria Street. The development shall be carried out in accordance with the approved details prior to the first occupation of the first use within the relevant building and the approved details shall be retained and maintained as such thereafter.	Pre-Commencement	Drawing refs to be changed
28	No development shall commence on site, barring any demolition works and any repair works at to the 12 roof level gables at 1-15 Queen Victoria Street and 148 Friar Street (as per approved plans: P22018-FCH-BA-XX-DR-A-1140 Rev P01 - Existing Elevation 01; P22018-FCH-BA-XX-DR-A-1450 Rev P01 - Demolition Elevation 01; P22018- FCH-BA-XX-DR- A-1400 Rev P01 - Proposed Elevation 01, as all received on	Pre-Commencement	Drawing refs to be changed

	26/08/2022), until a CCTV operational requirements study for this development, which shall include detailed plans as to what the role of each camera is, their location and to what standard they will achieve for both public and private realm, and where applicable internal areas of buildings, has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details prior to the first occupation of the first use within the relevant building and the approved details shall be retained and maintained as such thereafter.		
29	Notwithstanding the provisions of Schedule 2, Part 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking or re-enacting that Order with or without modification), the units identified as 'retail units' 01, 02, 07 and 08 on approved plan P22018-FCH-BA-00-DR-A-1300 Rev P02 - Proposed Ground Floor Plan, as received 02/11/2022 shall be used for Class E (a) (Display or retail sale of goods, other than hot food) use only and for no other purpose (including any other purpose in the same Use Class of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, or in any provision equivalent to that Class in any statutory instrument revoking or re-enacting that Order with or without modification.	Compliance	Condition Removed
30	Notwithstanding the provisions of Schedule 2, Part 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking or re-enacting that Order with or without modification), the units identified as 'retail units' 03, 04, 05, 06, 09 and 10 on approved plan P22018-FCH-BA-00-DR-A-1300 Rev P02 - Proposed Ground Floor Plan, as received 02/11/2022 shall be used for Class E (a) (Display or retail sale of goods, other than hot food) or Class E (b) (Sale of food and drink for consumption (mostly) on the premises) uses only and for no other purposes (including any other purpose in the same Use Class of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, or in any provision equivalent to that Class in any statutory instrument revoking or re-enacting that Order with or without modification.	Compliance	Condition Removed
31	Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking or re-enacting that Order with or without modification) no amalgamation of any part of proposed Queen Victoria Street units 05, 06, 07, 08 or 09 (identified as 'retail units' 05, 06, 07, 08 and 09 on approved plan P22018-FCH-BA-00-DR-A-1300 Rev P02 - Proposed Ground Floor Plan, as received 02/11/2022) hereby approved without the express planning permission from the local planning authority.	Compliance	Wording Modified to changed Unit Numbers
32	Any ground floor use, including the ground food and beverage / social space indicated on approved plan P22018-FCH-BA-00-DR-A-1300 Rev P02 - Proposed Ground Floor Plan, as received 02/11/2022, shall not be occupied at any time other than for purposes ancillary to the use as an apart-hotel (Class C1).	Compliance	Drawing refs to be changed
33	Any ancillary basement level use, including the basement level gym indicated on approved plan P22018-FCH-BA-B1-DR-A-1306 Rev P01 - Proposed Basement Floor Plan, as received 26/08/2022, shall not be occupied at any time other than for purposes ancillary to the use as an apart-hotel (Class C1), be for use by apart-hotel guests only and not be open to general members of the public.	Compliance	Drawing refs to be changed
34	The maximum number of apart-hotel rooms within the apart-hotel hereby approved shall not at any time exceed the approved number of 104 rooms, and shall include no fewer than 5 accessible rooms (as per Building Regulations Approved Document M Volume 2) within the approved number of 104 rooms.	Compliance	Rooms changed to 107
35	Notwithstanding the provisions of Class 12 of Schedule 3 of the Town and Country Planning (Control of Advertisements) Regulations 2007 (as amended), the ground floor units hereby approved along Friar Street, Queen Victoria Street and the newly created public courtyard shall retain 'active window displays' along the length of the frontages at ground floor level, without the installation of window vinyls, roller shutters, or similar which would obscure visibility between the public realm and the units during the unit's operating hours.	Compliance	No Change
36	Prior to first occupation of the apart-hotel use, full details of all external lighting to be installed within the development shall be submitted to and approved in writing by the Local Planning Authority. The details shall include a plan indicating the locations of the lights, specifications, height, luminance; lens shape/beam pattern and orientation, any hoods/shades, and an isolux contour map to show light spill levels (down to 2 lux if operating between 23:00 and 07:00, or down to 10 lux if operating only between 07:00 and 23:00) and showing neighbouring buildings. The details shall demonstrate that light levels will not exceed the relevant guidance lux levels specified in the Institute of Lighting Professionals : Guidance Notes for the Reduction of Obtrusive Light GN01:2011 and shall also demonstrate how glare will be controlled. The approved scheme shall thereafter be	Pre-Occupation	No Change

	installed before first apart-hotel use commences and the external lighting shall thereafter be maintained and operated in accordance with the approved details.		
37	Prior to the first occupation of the apart-hotel use hereby approved, details of a scheme providing external public art on site shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme of public art shall be installed before first occupation of the apart-hotel use of the development and shall thereafter be maintained in accordance with the approved details.	Pre-Occupation	No Change
38	Prior to the first occupation of the apart-hotel hereby permitted an operational management and maintenance strategy for the public courtyard accessed via Queen Victoria Street (as shown on approved plan P22018-FCH-BA-00-DR-A-1300 Rev P02 - Proposed Ground Floor Plan, as received 02/11/2022) shall be submitted to and approved in writing by the Local Planning Authority. The public courtyard shall be managed and maintained in accordance with the approved strategy thereafter.	Pre-Occupation	Drawing refs to be changed
39	Any ground floor level gates or doors hereby permitted which front onto Queen Victoria Street, Friar Street, Fife Court or the public courtyard (as shown on approved plan P22018-FCH-BA-00-DR-A-1300 Rev P02 - Proposed Ground Floor Plan, as received 02/11/2022) shall open inwards away from the highway/street (as appropriate) only.	Compliance	Drawing refs to be changed
40	The public courtyard (accessed via Queen Victoria Street as shown on approved plan P22018-FCH-BA-00-DR-A-1300 Rev P02 - Proposed Ground Floor Plan, as received 02/11/2022) shall not be used by members of the public outside the hours of 07:00 to 23:00 hours on Mondays to Fridays, 07:00 to 00:30 hours on Saturdays and 07:00 to 22:30 hours on Sundays and all Bank Holidays and Statutory Holidays.	Compliance	Drawing refs to be changed
41	Any Class E (a) (Display or retail sale of goods, other than hot food) use hereby permitted shall not be used by members of the public outside the hours of 07:00 to 23:00 hours on Mondays to Saturdays and 07:00 to 18:00 hours on Sundays and all Bank Holidays and Statutory Holidays.	Compliance	Change to opening time to 06:00 to correspond to adjacent uses Any Class E (a) (Display or retail sale of goods, other than hot food) use hereby permitted shall not be used by members of the public outside the hours of 06:00 to 23:00 hours on Mondays to Saturdays and 06:00 to 18:00 hours on Sundays and all Bank Holidays and Statutory Holidays.
42	Any Class E (b) (Sale of food and drink for consumption (mostly) on the premises) use hereby permitted shall not be used by members of the public outside the hours of 07:00 to 23:30 hours on Mondays to Fridays, 07:00 to 00:30 hours on Saturdays and 10:00 to 22:30 hours on Sundays and all Bank Holidays and Statutory Holidays.	Compliance	Change to opening time to 06:00 to correspond to adjacent uses Any Class E (b) (Sale of food and drink for consumption (mostly) on the premises) use hereby permitted shall not be used by members of the public outside the hours of 06:00 to 23:30 hours on Mondays to Fridays, 06:00 to 00:30 hours on Saturdays and 06:00 to 22:30 hours on Sundays and all Bank Holidays and Statutory Holidays.
43	Any ancillary ground floor use, including the food and beverage and social space indicated on P22018-FCH-BA-00-DR-A-1300 Rev P02 - Proposed Ground Floor Plan, as received 02/11/2022, shall only be open to non-apart-hotel guests between 07:00 - 23:00 hours on Mondays to Fridays, 07:00 to 00:00 hours on Saturdays and 07:00 to 22:00 hours on Sundays and all Bank Holidays and Statutory Holidays.	Compliance	Change to opening time to 06:00 to correspond to adjacent uses Any ancillary ground floor use, including the food and beverage and social space indicated on P22018-FCH-BA-00-DR-A-1300 Rev P02 - Proposed Ground Floor Plan, as received 02/11/2022, shall only be open to non-apart-hotel guests between 06:00 - 23:00 hours on Mondays to Fridays, 06:00 to 00:00 hours on Saturdays and 06:00 to 22:00 hours on Sundays and all Bank Holidays and Statutory Holidays.

44	No development, barring any demolition works and any repair works to the 12 roof level gables at 1-15 Queen Victoria Street and 148 Friar Street (as per approved plans: P22018-FCH-BA-XX-DR-A-1140 Rev P01 - Existing Elevation 01; P22018-FCH-BA-XX-DR-A-1450 Rev P01 - Demolition Elevation 01; P22018-FCH-BA-XX-DR-A-1400 Rev P01 - Proposed Elevation 01, as all received on 26/08/2022) and the demolition to ground level of No 146 Friar Street and inward facing buildings within the application site (as shown on approved plans P22018-FCH-BA-XX-DR-A-1140 Rev P01 - Existing Elevation 01; P22018-FCH-BA-XX-DR-A-1450 Rev P01 - Demolition Elevation 01; P22018-FCH-BA-XX-DR-A-1400 Rev P01 - Proposed Elevation 01, as all received on 26/08/2022) and the demolition to ground level of No 146 Friar Street and inward facing buildings within the application site (as shown on approved plans P2218-FCH-BA-00-DR-A-1320 Rev P01 - Pre Commencement Demolition Ground floor, P22018-FCH-BA-01-DR-A-1321 Rev P01 - Pre Commencement Demolition First floor, P22018-FCH-BA-02-DR-A-1322 Rev P01 - Pre Commencement Demolition Second floor, P22018-FCH-BA-03-DR-A-1323 Rev P01 - Pre Commencement Demolition Third floor, P22018-FCH-BA-B1-DR-A-1324 Rev P01 - Pre Commencement Demolition Basement, P22018-FCH-BA-XX-DR-A-1420 Rev P01 - Pre Commencement Demolition Elevation 01, P22018-FCH-BA-XX-DR-A-1421 Rev P01 - Pre Commencement Demolition Elevation 02, P22018-FCH-BA-XX-DR-A-1422 Rev P01 - Pre Commencement Demolition Elevation 03, as all received on 13/04/2023, and P22018-FCH-BA-XX-DR-A-1520 Rev P01 - Pre-Commencement Demo Section 01, P22018-FCH-BA-XX-DR-A-1521 Rev P01 - Pre-Commencement Demo Section 02, P22018-FCH-BA-XX-DR-A-1522 Rev P01 - Pre-Commencement Demo Section 03, P22018-FCH-BA-XX-DR-A-1523 Rev P01 - Pre-Commencement Demo Section 04, as all received on 10/05/2023), shall commence on site until either a) a copy of an Interim BREEAM Certificate in accordance with the BREEAM Sustainability Standard demonstrating compliance with a minimum standard of BREEAM Excellent rating, or b) satisfactory evidence of equivalence, has been submitted to and approved in writing by the Local Planning Authority.	Pre-Commencement	Drawing refs to be changed
45	Within six months of first occupation of the apart-hotel use hereby approved, either a) a copy of a Final BREEAM Certificate in accordance with the BREEAM Sustainability Standard following a post-construction stage review carried out by a licensed assessor, demonstrating that the relevant part of the development has attained as a minimum the standard set out in the Interim BREEAM Certificate referred to in condition 44, or b) satisfactory evidence of equivalence following the approach in condition 44, has been submitted to and approved in writing by the Local Planning Authority.	Pre-Occupation	No Change
46	The development shall be carried out in accordance with the energy measures and carbon reductions achieved in the Energy Statement documents hereby approved (Low Zero Carbon (LZC) Study by Troup Bywaters + Anders Ref WA0305-TBA-Q1-XX-RP-N-00003 Revision P02 - dated 14th November 2022; Energy and BREEAM Statement by Troup Bywaters + Anders Ref WA0305-TBA-Q1-XX-RP-N-00002 Revision P04 - dated 14th November 2022; MEP Strategies Report by Troup Bywaters + Anders Ref WA0305-TBA-Q1-XX-RP-N-00001 Revision P04 - dated 14th November 2022; 138-144 and 145-148 Friar Street: TB+A supplementary information in relation to PR6 - Sustainable Design and Construction SPD Section 8.6 Ground-Source and Air-Source Heat Pump by Troup Bywaters + Anders dated and received 01/12/2022; 138-144 and 145-148 Friar Street: TB+A supplementary information in relation to EE2 Baseline energy demand by Troup Bywaters + Anders dated and received 01/12/2022) and be retained and maintained as such thereafter.	Compliance	No Change
47	Prior to any works associated with the demolition of existing Number 146 Friar Street commencing, a full scheme and all details associated with the repair of all 12 roof level gables at Numbers 1-15 (odd) Queen Victoria Street and Number 148 Friar Street, including a timetable for the reinstatement of all 12 gables, has been submitted to and approved in writing by the Local Planning Authority. The repair works to all 12 gables shall be carried out in accordance with the details approved thereafter.	Pre-Demolition	Already Discharged
48	No development, barring any demolition works and any repair works to the 12 roof level gables at 1-15 Queen Victoria Street and 148 Friar Street (as per approved plans: P22018-FCH-BA-XX-DR-A-1140 Rev P01 - Existing Elevation 01; P22018-FCH-BA-XX-DR-A-1450 Rev P01 - Demolition Elevation 01; P22018-FCH-BA-XX-DR-A-1400 Rev P01 - Proposed Elevation 01, as all received on 26/08/2022), shall commence until ground floor shopfront details at scale 1:20 (sections and layouts) are submitted to and approved in writing by the Local Planning Authority in relation to a) Friar Street and b) all inner courtyard elevations. The shopfronts shall be carried out and thereafter maintained in accordance with the details approved.	Pre-Commencement	Drawing refs to be changed

Application Determination by Section 73

1.13 Section 73 of the Act (“S73”) states:

Determination of applications to develop land without compliance with conditions previously attached.

- (1) This section applies, subject to subsection (4), to applications for planning permission for the development of land without complying with conditions subject to which a previous planning permission was granted.
- (2) On such an application the local planning authority shall consider only the question of the conditions subject to which planning permission should be granted, and—
 - (a) if they decide that planning permission should be granted subject to conditions differing from those subject to which the previous permission was granted, or that it should be granted unconditionally, they shall grant planning permission accordingly, and
 - (b) if they decide that planning permission should be granted subject to the same conditions as those subject to which the previous permission was granted, they shall refuse the application.

1.14 Planning Practice Guidance ‘Flexible Options for Planning Permissions’ (Updated July 2023) states:

Amending the conditions attached to a permission (application under Section 73 TCPA 1990)

How are the conditions attached to a planning permission amended?

In contrast to section 96A, an application made under [section 73 of the Town and Country Planning Act 1990](#) can be used to make a material amendment by varying or removing conditions associated with a planning permission. There is no statutory limit on the degree of change permissible to conditions under s73, but the change must only relate to conditions and not to the operative part of the permission.

1.15 The key points being, there is ‘no statutory limit on the degree of change permissible’ however the ‘the change must only relate to conditions and not to the operative part of the permission.’

1.16 This position takes, we submit, takes into account:

Finney v Welsh Ministers & Ors [2019] EWCA Civ 1868 (05 November 2019)

- It was held in this appeal that changing the description of the permitted development was outside the power conferred by section 73. It is a question of statutory interpretation and section 73 is on the face of it limited to granting permission for the development of land “without complying with conditions” subject to which a previous planning permission was granted. The planning authority should therefore consider only the question of conditions. The permission granted pursuant to section 73 should permit the same development subject to different conditions. The appeal was allowed and the inspector’s decision quashed.

Armstrong v Secretary of State for Levelling-Up, Housing and Communities & Anor [2023] EWHC 176 (Admin) (27 January 2023)

- The judge noted the well-established tests for the imposition of conditions and reasoned that, given those tests, most conditions are fundamental to the grant of permission. A S73 application is therefore likely to involve a significant or fundamental change to the permission. Limiting the consideration of an application only to non-fundamental variations would significantly diminish the scope of S73 in a way that does not make sense, particularly given that the planning merits of the proposal must still be considered.

Fiske v Test Valley Borough Council [2023] EWHC 2221 (Admin)

- Applying those principles to the facts of the case, the judge found that because the amended plans omitted a substation, the conditions attached to the section 73 permission which required the development to be carried out in accordance with the amended plans created a conflict with the operative wording, which rendered the section 73 permission unlawful.

1.17 We consider there are three principal cases, which are worth noting the PPG has been updated (26.07.23) and establishes:

1.18 Material changes are a fundamental aspect of the scope of S73 and therefore significant and fundamental changes to the permission are permissible under S73.

1.19 Wording of the description of development should not change, we have carefully appraised the wording, and the changes proposed will permit the same development subject to different conditions.

1.20 Operative wording of the consent shall not be altered by the S73, nor the conditions should create conflict with the operative wording.

1.21 As advised and set out at para.1.9, the amendments to the scheme are modest, there is a modest reduction in the massing, modest internal changes, and some minor design tweaks, within the context of the proposal and having regard to the PPG and relevant case law, these changes are not fundamental; do not change the operative wording of the consent; and do not create conflict between the conditions and the consent.

1.22 Therefore, we submit, this scheme is exactly the scenario expected and the use of S73 was introduced to facilitate. We note that Section 19 of the Planning (Listed Build and Conservation Areas) Act allows changes, however, for completeness a new listed building consent is sought.

Planning Application Drawings

1.23 The previously approved drawings and those amended to replace them are listed in the table below:

Drawing	Approved	Proposed
Demolition Ground Floorplan	P22018-FCH-BA-00-DR-A-1350-P01	P22018-FCH-BA-00-DR-A-1350-P02
Demolition First Floorplan	P22018-FCH-BA-01-DR-A-1351-P01	P22018-FCH-BA-01-DR-A-1351-P02
Demolition Second Floorplan	P22018-FCH-BA-02-DR-A-1352-P01	P22018-FCH-BA-02-DR-A-1352-P02
Demolition Third Floorplan	P22018-FCH-BA-03-DR-A-1353-P01	P22018-FCH-BA-03-DR-A-1353-P02
Demolition Basement Floorplan	P22018-FCH-XX-B1-DR-A-1355-P01	No Change P22018-FCH-XX-B1-DR-A-1355-P01
Demolition Elevation 01	P22018-FCH-BA-XX-DR-A-1450-P01	No Change P22018-FCH-BA-XX-DR-A-1450-P01
Demolition Elevation 02	P22018-FCH-BA-XX-DR-A-1451-P01	No Change P22018-FCH-BA-XX-DR-A-1451-P01
Demolition Elevation 03	P22018-FCH-BA-XX-DR-A-1452-P01	No Change P22018-FCH-BA-XX-DR-A-1452-P01
Proposed Site Plan - Ground	P22018-FCH-BA-XX-DR-A-1203-P02	P22018-FCH-BA-XX-DR-A-1203-P02
Proposed Ground Floorplan	P22018-FCH-BA-00-DR-A-1300-P02	P22018-FCH-BA-00-DR-A-1300-P07
Proposed First Floorplan	P22018-FCH-BA-01-DR-A-1301-P02	P22018-FCH-BA-01-DR-A-1301-P07
Proposed Second Floorplan	P22018-FCH-BA-02-DR-A-1302-P02	P22018-FCH-BA-02-DR-A-1302-P07
Proposed Third Floorplan	P22018-FCH-BA-03-DR-A-1303-P02	P22018-FCH-BA-03-DR-A-1303-P07
Proposed Fourth Floorplan	P22018-FCH-BA-04-DR-A-1304-P02	P22018-FCH-BA-04-DR-A-1304-P06
Proposed Lower Roof Plan	P22018-FCH-BA-RF-DR-A-1305-P01	P22018-FCH-BA-RF-DR-A-1305-P06
Proposed Basement Floorplan	P22018-FCH-BA-B1-DR-A-1306-P01	P22018-FCH-BA-B1-DR-A-1306-P03
Proposed Upper Roof Plan	P22018-FCH-BA-RF-DR-A-1307-P01	P22018-FCH-BA-RF-DR-A-1307-P02
Proposed Elevation 01	P22018-FCH-BA-XX-DR-A-1400-P01	P22018-FCH-BA-XX-DR-A-1400-P04
Proposed Elevation 02	P22018-FCH-BA-XX-DR-A-1401-P01	P22018-FCH-BA-XX-DR-A-1401-P04
Proposed Elevation 03	P22018-FCH-BA-XX-DR-A-1402-P01	P22018-FCH-BA-XX-DR-A-1402-P04
Proposed QVS Shop Front Design	P22018-FCH-BA-XX-DR-A-1410-P01	No Change P22018-FCH-BA-XX-DR-A-1410-P01
Replacement Window Detail	P22018-FCH-BA-XX-DR-A-1411-P01	No Change P22018-FCH-BA-XX-DR-A-1411-P01
Proposed Courtyard Elevation	P22018-FCH-BA-XX-DR-A-1412-P01	No Change P22018-FCH-BA-XX-DR-A-1412-P01
Proposed Rear Elevations 01 - 02	P22018-FCH-BA-XX-DR-A-1413-P01	P22018-FCH-BA-XX-DR-A-1413-P02
Proposed Section 01	P22018-FCH-BA-XX-DR-A-1500-P01	P22018-FCH-BA-XX-DR-A-1500-P03
Proposed Section 01	P22018-FCH-BA-XX-DR-A-1500-P01	P22018-FCH-BA-XX-DR-A-1500-P03
Proposed Section 02	P22018-FCH-BA-XX-DR-A-1501-P01	P22018-FCH-BA-XX-DR-A-1501-P02
Proposed Section 03	P22018-FCH-BA-XX-DR-A-1502-P01	P22018-FCH-BA-XX-DR-A-1502-P02
Proposed Section 04	P22018-FCH-BA-XX-DR-A-1503-P02	P22018-FCH-BA-XX-DR-A-1503-P02
Proposed Section 05	P22018-FCH-BA-XX-DR-A-1504-P02	P22018-FCH-BA-XX-DR-A-1504-P02
Proposed Section 06	P22018-FCH-BA-XX-DR-A-1505-P01	P22018-FCH-BA-XX-DR-A-1505-P03
Proposed Section 06	P22018-FCH-BA-XX-DR-A-1505-P01	P22018-FCH-BA-XX-DR-A-1505-P03
Proposed Section 07	P22018-FCH-BA-XX-DR-A-1506-P01	P22018-FCH-BA-XX-DR-A-1506-P02
Proposed Section 08	P22018-FCH-BA-XX-DR-A-1507-P01	P22018-FCH-BA-XX-DR-A-1507-P02
Proposed Section 09	P22018-FCH-BA-XX-DR-A-1508-P01	P22018-FCH-BA-XX-DR-A-1508-P02

Application Submission

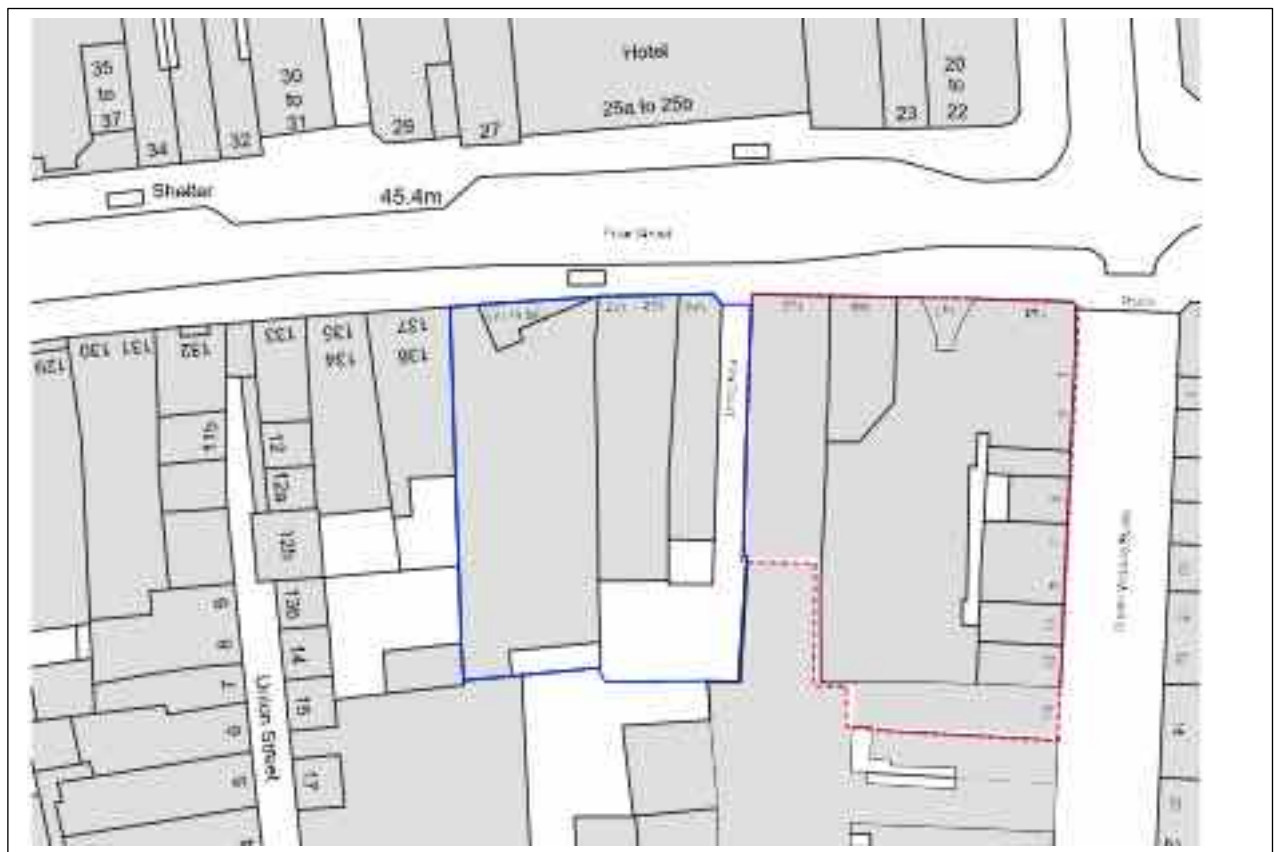
- 1.24 This Planning Statement should be read in conjunction with the following supporting documents submitted with this application. This material will show that the proposals accord with national and local planning policy and guidance, represent sustainable development and there are no material considerations that indicate that an application under section 73 of the town and country planning act could not be approved for this scheme.

Report	Prepared by:	Amended
Location Plan	FCH Architects	No
Drawings	FCH Architects	Yes (see table above)
DAS	FCH Architects	Yes
- Utilises	FCH Architects	No change
- Landscape principles	FCH Architects	Slight Modification
- Materials Details	FCH Architects	No change
- Waste Collection	FCH Architects	Slight Modification
- External Lighting	FCH Architects	No change
- Cycle parking	FCH Architects	Slight Modification
- Fire Statement	FCH Architects	Slight Modification
Heritage & Townscape Visual Impact Assessment	Revival & Taylor	Addendum
Archaeological Assessment	Oxford Archology	No change
Air quality assessment	GEM	No change
Energy / Sustainability Statement	TBA	No change
M&E (Ventilation / Extraction Details)	TBA	No change
Drainage	Uddin	No change
Ecology	Skilled Ecology	No change
Flood Risk & SUDS	JME	Addendum
Fire Statement	Horner / FCH	No change
Noise & Vibration Impact Assessment	KPA	No change
Transport Assessment	MODE	No change
Servicing Details (including Waste)	MODE	No change
Travel Plan	MODE	No change
CMP	MODE	Yes
Structure	Axiom	No change
Planning Statement	TPBureau	Yes
Heads of Terms	TPBureau	No change
CIL	TPBureau	Yes
Management Report	Thackeray	No change
Statement of Community Involvement	TPBureau	No change

2.0 Site Location & Description

The Site

- 2.1 The site is a prominent plot located on the corner of Queen Victoria Street (“QVS”) and buildings along Friar Street, with significant frontage to both. QVS is the principle pedestrianised access point to the town centre from Reading Railway Station and Friar Street is traffic controlled with access to busses and taxis only.
- 2.2 The Site comprises a number of premises with retail uses at ground floor level with other secondary uses (although vacant) at first floor level and above. Both QVS and Friar Street are key primary retail streets within the town centre and are in a highly accessible location, approximately 250m from Reading Railway Station to the north.



- 2.3 The site comprises the following distinct buildings:
- 1-15 QVS - Part of a larger terrace built in the early 1900s, the QVS properties comprise retail accommodation arranged over the ground and basement floors. The remaining 1st, 2nd and 3rd floors being office accommodation, albeit there are many vacant units. The properties are Grade II listed.
 - 148 Friar Street - This unit comprises retail floorspace at ground (Café Nero) with vacant office floors above. The building is located on the corner of Friar Street and forms the corner of 1-15 QVS. This property is also Grade II listed.

- 147 Friar Street - Dating from the early 1880s, this unit comprises retail/ nail salon at ground floor with three vacant floors above, which are understood to be former offices. The building is also Grade II listed - the main interest of the building is the 2-storey shop front.
- 146 Friar Street is basement and 3-storeys in height, with an retail use at basement and ground floor level (Reading Food & Wine) and on the upper floors Simple Recruitment Services. This building is not listed.
- 145 Friar Street is basement and 4-storeys in height, with WHSmith formerly occupying the ground floor and office uses above. This building is not listed.
- To the rear of the properties were a mix of more modern extensions and additions (late 19th and 20th centuries) - these have been demolished (in accordance with requisite approvals) and have allowed thorough assessment of the site and removed vacant and deteriorating buildings that resulted in anti-social behaviour and accessing by rough sleepers.

2.4 A full detailed description of the Site and existing buildings is included within the DAS submitted with this application and the full historic description of the Site is contained within the Heritage Statement.

3.0 Relevant Planning History

- 3.1 This section summarises relevant planning applications for the Site and other relevant developments in the surrounding area. A summary is provided of proposals previously presented for pre-application advice and the responses received from the Council.

QVS1 Planning Application

- 3.2 The most recent application for 1-15 Queen Victoria Street and 145-148 Friar Street Reading, (Phase 1 (QVS1)) was approved on 24th May 2023, for:

“Demolition of No. 146 Friar St and structures to rear and partial demolition of No. 145 Friar St and various external works to other existing buildings, as part of redevelopment to provide: reconfigured basement and ground floor uses (Class E(a) or (b)) on Friar St and Queen Victoria St frontages and proposed apart-hotel (Class C1) at part-basement, partground and on all upper floors; part-two, part- three storey rear extension to No’s 5-15 (odd) Queen Victoria St; replacement basement and five storey building at No. 145 Friar St and twostorey roof extension to No. 146 Friar St; proposed public courtyard accessed via Queen Victoria St walkway; roof level plant; and various other associated works.

Pre-Application Advice

- 3.3 In developing the proposals herewith, pre-application advice was obtained. The scheme has been further refined in response to the advice received. The latest feedback received states in summary:

- The re-introduction of the internal courtyard (in comparison with the previous iteration, as per feedback supplied on 19/12/2023) for public use, of a similar size and nature of that approved as part of permission 221232, is welcomed.
- It is considered that the provision of 3 separate retail units along Queen Victoria Street at No’s 5-15, in the context of there being 4 existing units (whilst also mindful of 6 separate units being approved as part of 221232), is likely, on balance, to be considered appropriate in overall terms, whilst acknowledging this would not comply with Policy CR8 (Small Shop Units in Central Reading). However, this is subject to the precise internal works being appropriate in listed building terms (e.g. in themselves and also incorporating elements of reversibility) and this should strictly not be a precursor to any possible future strategy to further alter this from 4 to 3, (or then to 2 and then eventually to 1 unit) along this stretch of Queen Victoria Street in time.
- Your submission should be absolutely clear as to what individual uses within Class E are sought for each unit and what impacts the proposals would have on the wider frontage as a whole.
- Procedurally, your application will still need to demonstrate how you consider the proposals align with the backdrop of s73, in light of previously referenced Case Law. Separate listed building consent will be required for the various works now envisaged. We can look over your worked up plans themselves in more detail at validation stage, but please bear in mind the comments above.

4.0 The Proposals

- 4.1 As advised, this section 73 application seeks material changes to planning permission ref: 221232 and listed building consent 221233.
- 4.2 The proposals include the redevelopment of 1-15 Queen Victoria Street & 145-148 Friar Street, the repair and refurbishment of heritage buildings, Apart-hotel rooms, high quality heritage retail and a public courtyard.
- 4.3 The changes to the scheme are set out in Section 1, para.1.9.
- 4.4 Each key element of the proposals is summarised below in turn.

Demolition

- 4.5 Through site assessments, heritage assessments, archaeological assessments and pre-application advice discussions with the Council, the poor quality and lower value elements of the Site to the rear and No.146 were identified as suitable for demolition and have been demolished. This will make way for a sympathetic, modern, and inventive redevelopment to the rear of the Site and enable the creation of a new courtyard, improved permeability, and enhanced commercial offering.
- 4.6 The existing modern shopfronts to QVS and Friar Street will also be removed to enable the more sympathetic façade alterations and shopfront reinstatement.
- 4.7 No other demolition or removal are proposed as part of the changes, with the exception of elements of modest internal changes are proposed.

Change of Use - Aparthotel

- 4.8 The upper floors of the existing buildings are in lawful use as offices (Use Class (E(g)) and are currently vacant. This application proposes the change of use of the first, second and third floors of the existing buildings and extension to create a 107-unit apart hotel (Use Class C1) - an increase of 3 units. The units will be a mix of unit sizes, which will be for short-term let. The below table shows the units proposed per floor.

Floor	Units
1	32
2	32
3	31
4	12
Total	107

Class E - Ground Floor Uses

- 4.9 The primary reason for changing the ground and basement is to improve their desirability and based on extensive marketing and to align with retailers and the market demand - see comparison drawing below.



- Retail units 1 & 2 & 4 would be extended and combined to form two large retail units (01 & 02) in Class Ea and Eb increasing from 281.8sqm to 299.4sqm at ground floor (a further 109.6 at basement: 409sqm in total).
- Retail unit 3 would be retained as a retail unit (Class Ea) but reduced from 121.1sqm to 95.7sqm at ground floor to allow apart-hotel access from QVS and provide a lobby but retain the basement (199.5sqm in total).
- Retail units 5, 6, 7, 8, 9 & 10 would be updated and amended to form retail units 4, 5 and 6 - these would be in Class Ea & Eb providing a floorspace increase from 373.9sqm to 410.8sqm at ground floor with a further 259.6sqm at basement.
- Therefore, ground floor Class E increases from 776.8sqm to 805.9sqm, with total commercial floor area of 1258.9sqm.

- 4.10 It should also be noted that the existing site provides only four retail units, Unit 5 is 53.2sqm but the remaining three are all over 125sqm - see drawing below.

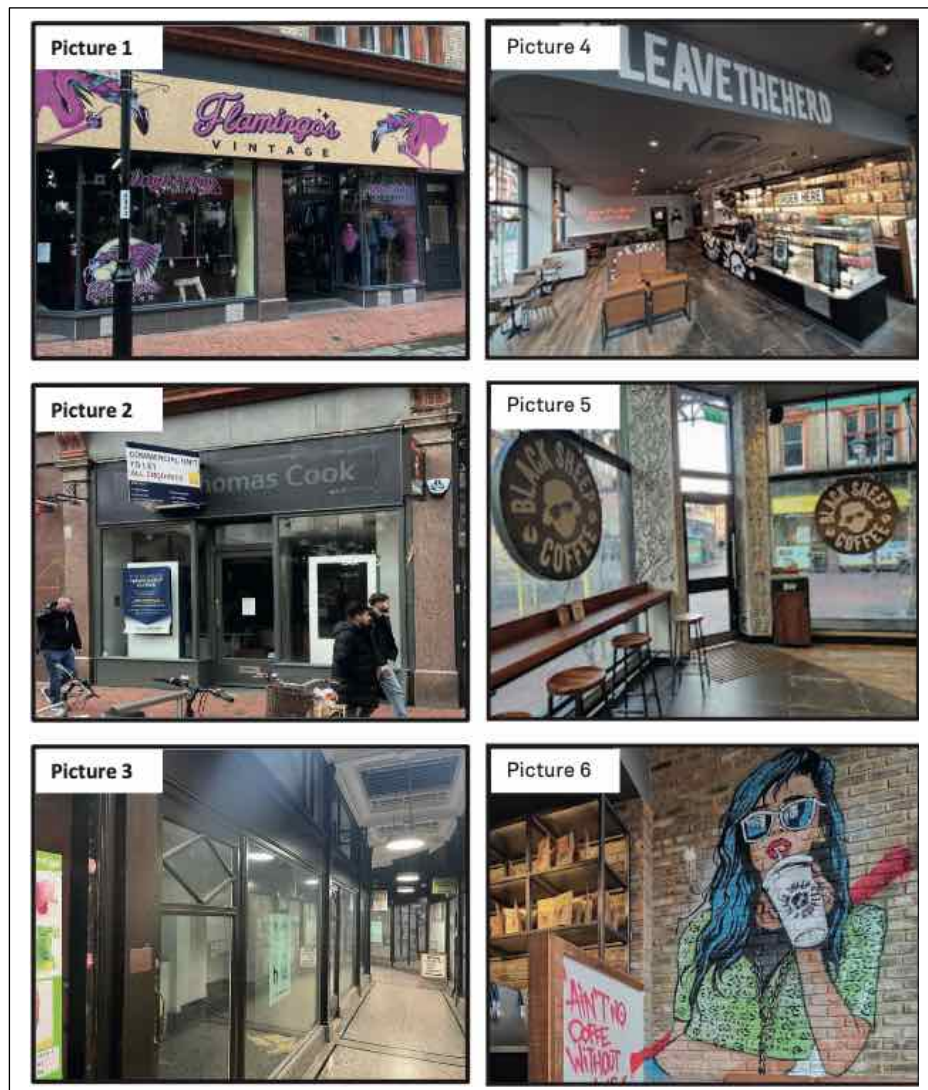


- 4.11 The independent retailers were a key aspiration for the Applicant and one they have tried to cultivate since the inception. However, as Officers may be aware, the Applicant holds a sizeable holding in Reading and across the country, especially the south. They have encountered significant periods of vacancy or non-payment of rent from many of the independents, including offering free rent. As the cost to build has risen together with interest rates, the lenders now will not fund the development without secure covenants in place. We note the significant vacancies in Harris arcade and the concerns over 150 Friar Street (Applicant owns and is occupied by an independent) - an offer from a well-funded and established business has been made and is the only viable way to move this scheme forward. The further benefits of larger shop units is set out below and provided by the Applicant. For note, the Applicant provided full financial justification at pre-application stage, which is of course commercial sensitive and not for public disclosure.

- This financial stability of the larger businesses reduces the risk of late or missed rental payments, providing a reliable income stream for the landlord to secure funding against. Thackeray have vast rent arrears throughout their Reading portfolio, all of which is attributed to the smaller independent businesses.
- Larger businesses have the funding to invest significant sums of money into their fitout which will enhance the overall quality of the property and make it more appealing to the public as well as raising the profile of the street and scheme. The majority of small businesses on Queen Victoria St who have low quality fitout and signage that damages the appearance of the Street - See Picture 1.
- Resilient to economic downturns due to their diversified operations and market reach. This resilience is not only advantageous but also ensures businesses can continue trading and

prevents vacancies / empty units which is currently a major issue in Reading town centre - See Picture 2.

- Established customer base and marketing efforts generate a steady foot fall to the property. This increased visibility and customer flow will positively impact the performance of other tenants on Queen Victoria Street and the wider town centre. The smaller businesses are more prone to change in ownership, closures, and re-locations. High turnover is disruptive and leads to increased vacancy periods, challenges in finding new tenants, and property security risks, as exemplified by The Harris Arcade - See Picture 3.
- The larger businesses have experienced and professional management teams, reducing the likelihood of issues related to property maintenance, adherence to lease terms, and other operational concerns.
- Serve as an anchor tenant, drawing customers and other businesses to scheme and wider Queen Victoria Street. The presence of a well-known anchor tenant can positively impact the perception of the street / retail parade.
- The shop front/ internal fit out is heritage positive and high quality, especially when compared to others. It has exposed brick-work, stone floor, heritage shop front; it is a significant enhancement to the street scene and the calibre and standard of fitout, which tenants simply cannot fund and based on past performance, have sought to undertake. (Pictures 4,5 and 6)



4.12 The proposed tenants for amended retail units, although not falling within the original aspiration for the site, offers a robust tenant that will attract people to this part of the town

centre and will achieve the vision of attracting businesses, shoppers, visitors, workers, students and investment into Reading Town Centre.

Class E Uses Sought

- 4.13 As existing, the shop units for 145 to 148 Friar Street and 1-15 QVS are in Class E use, there are no restrictions on what criterion such falls within the use class. The Applicant is seeking to let the site and to ensure the scheme is viable. Based on the extensive marketing exercise, the following uses are sought (sqm):

Retail Unit	Use Class	GF Size	BF Size	Total Size
01	Class E(a) & E(b)	192.7	-	192.7
02	Class E(a) & E(b)	106.7	109.6	216.3
03	Class E(a)	95.7	103.8	199.5
04	Class E(a) & E(b)	102.6	84.0	186.6
05	Class E(a) & E(b)	92.0	65.1	157.1
06	Class E(a) & E(b)	216.2	90.5	306.7
TOTAL		805.9	453.0	1258.9

Internal Alterations

- 4.14 This s.73 application is accompanied by demolition plans and drawings showing the changes to the proposed demolition and alterations of the internal layout and features. The proposed plans show the new intended layout for each floor. Of the building elements to be retained, the internal alterations include:

- Removal of internal partitions and doors;
- Removal of fixed furniture and fittings, such as built-in cabinets, counters and sanitaryware;
- Removal of parts of the rear façade to accommodate the proposed extension;
- Removal of some staircases (retention of those with heritage value);
- Removal of some windows and doorways on the external rear façade;
- New partitions and doorways to create apartments; and
- Creation of new internal staircases.

- 4.15 The Heritage Statement submitted with this application details the heritage value of internal features and the justification for retention or removal of internal elements - nibs and piers will be retained to ensure the heritage layout is retained. The Heritage Consultant concludes:

“Along Queen Victoria Street, the existing configuration of the shops is four retail units and would be changed to create three units to suit the needs of the future occupants with minimal internal changes. Where modest limited openings are created nibs and piers would be retained to aid revertability and the openings would be kept to a minimum within the heritage footprint. A new entrance door to the Apart Hotel would also be added, in order to provide access from the street. However, the external rhythm of the shop front, alongside the new entrance door, would be maintained with the retention of the related pilasters.”

Repairs and Refurbishment

- 4.16 The existing buildings are in a poor state of repair and there are elements and architectural detailing that are in danger of being lost without intervention. The proposals include the

identification and restoration of the key architectural features of the existing buildings, principally associated with the front elevations of the QVS and Friar Street façades.

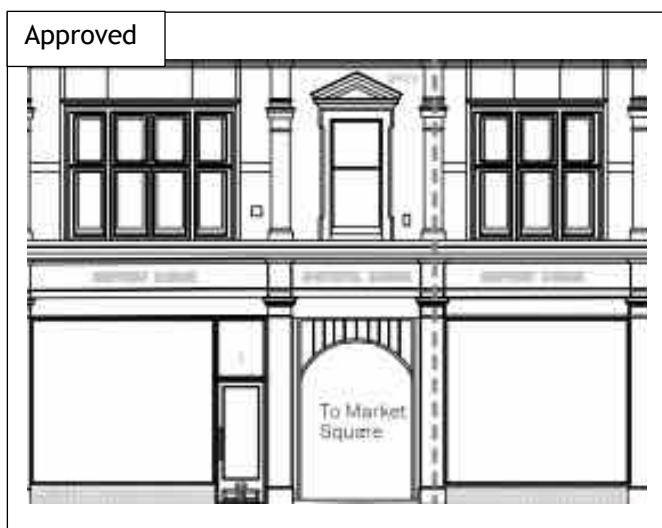
Rear Extensions

- 4.17 The proposals include a new three-storey extension with mansard to the rear of nos. 1-15 QVS to create additional retail floorspace at ground floor and to accommodate part of the proposed apart-hotel on upper floors - this amended scheme make a modest alteration. The extension will be of red brick construction to match materials used in the existing buildings and will include a mansard roof with dormer windows on the third floor. Windows on the first and second floors will be timber framed sash windows with stone surrounds and lintels.
- 4.18 The ground floor of the rear extension will host new retail shopfronts with double-height, metal framed glazing framed by stone-effect round columns. These will form the rear entrances to the ground floor retail units fronting QVS.

Façade Alterations

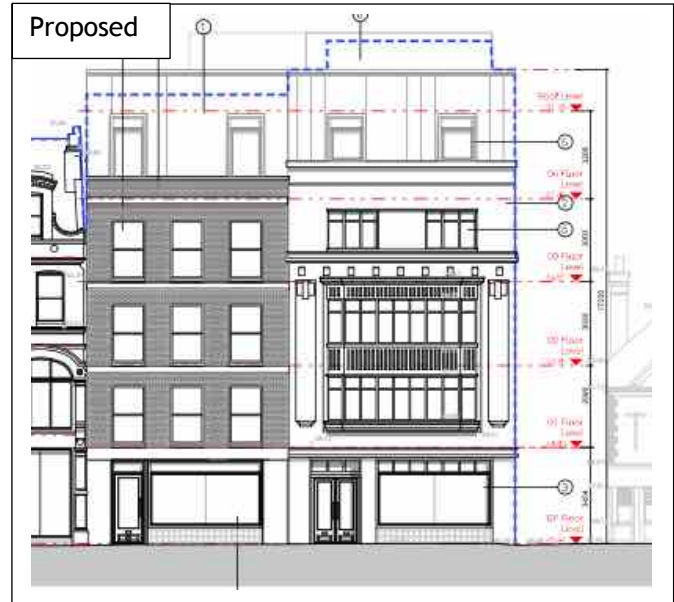
- 4.19 The principal alterations to the front facades of the existing buildings will be at ground floor with the creation of new, uniform shopfronts - there are no changes to the 1-15 QVS nor 147-148 Friar Street proposals. The shopfronts will have metal framed glazing and glass single entrance doors, uniform signage and street numbering and a black tiled plinth. A new opening will be created between nos. 3 and 5 QVS to create a pedestrian access passage to the proposed public square behind that 'frames' the public square entrance and an entrance in 3QVS to access the aparthotel. Heritage consultant summaries this change as:

"The new entrance to the Hotel would follow the established rhythm of the shop fronts and blend seemingly with the streetscape, causing no harm to the significance of the buildings."



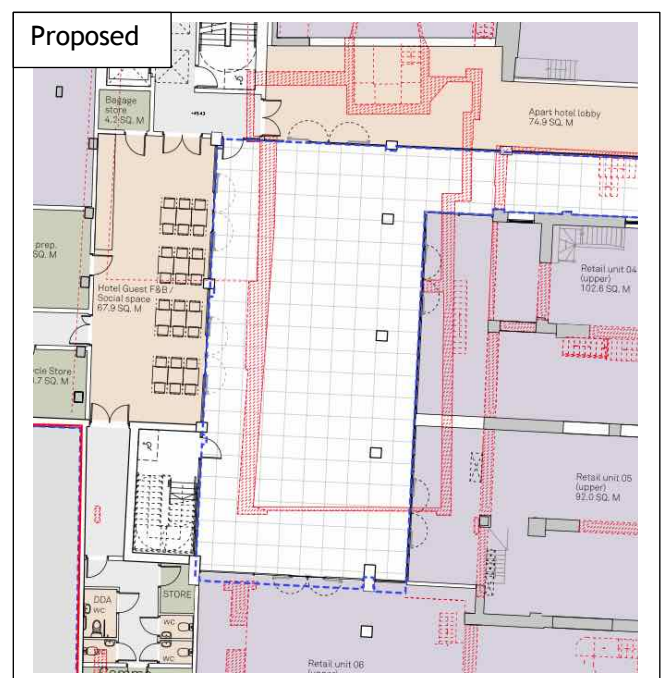
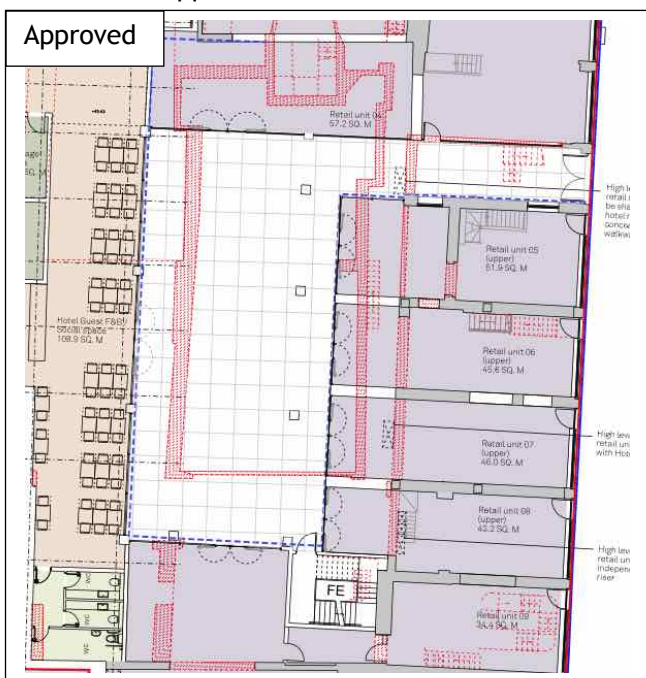
Roof Alterations

- 4.20 There are modest changes to the roofs of 145 and 146 Friar Street, the dormers and roof are modestly changed - a comparison is presented below. This will improve form and function, with more efficient build.



Courtyard

- 4.21 The demolition of structures to the rear of the Site will enable the creation of a new public courtyard and public realm. This will provide an open-air public space with additional covered space under the first-floor element of the new rear extension. The square will be a multi-functional public space that will operate as outdoor seating space associated with the retail units and for general public rest and relaxation. The operation and management of the square will fall with the Class E and Aparthotel use, which is a more efficient and viable approach. But the overall concept of a new courtyard is the same and the size extent is the same as approved.



5.0 Relevant Planning Policy and Legislation

Planning Policy Framework

- 5.1 In preparing the application proposals, consideration has been given to the relevant development plan for the Site and proposed development, which comprises the key documents and sources set out below.

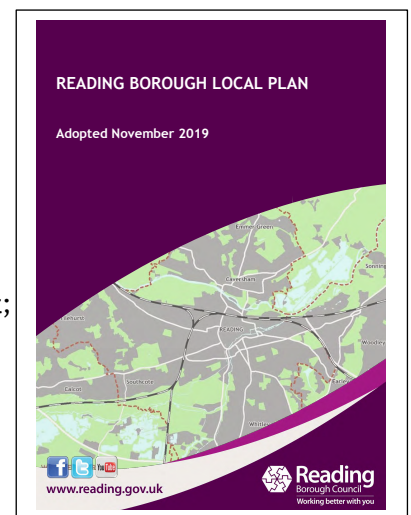
National Planning Policy Framework (NPPF) (2021)

- 5.2 The NPPF establishes overarching national policies for plan making and decision taking. At the heart of the NPPF is a presumption in favour of sustainable development where permission should be granted for development that accords with an up-to-date development plan, or where material considerations indicate otherwise.
- 5.3 Whilst the NPPF as a whole has been considered, of particular note is chapter 16: conserving and enhancing the historic environment. This sets out the rigorous policy tests that should be adhered to in the assessment of the significance of a statutorily protected heritage asset and the impacts of proposed development.

Reading Borough Local Plan (RBLP) (2019)

- 5.4 The RBLP provides local policy and guidance, which accords with that set out at national level in the NPPF, providing a greater level of detail. The key policies of relevance to this application are listed below:

- Sustainability, Design and Amenity:
 - CC1: Presumption in favour of sustainable development;
 - CC2: Sustainable design and construction;
 - CC3: Adaptation to climate change;
 - CC4: Decentralised energy;
 - CC6: Accessibility and the intensity of development;
 - CC7: Design and the public realm;
- Natural and Historic Environment:
 - EN1: Protection and enhancement of the historic environment;
 - EN4: Locally Important Heritage Assets
 - EN17: Noise generating equipment;
 - EN18: Flooding and drainage;
- Transport:
 - TR1: Achieving the transport strategy;
 - TR3: Access, traffic and highway related matters;
- Retail and Leisure:
 - RL1: Network and hierarchy of centres;
 - RL2: Scale and location of retail, leisure and culture development;
- Central Reading:
 - CR1: Definition of Central Reading;
 - CR2: Design in Central Reading;
 - CR7: Primary frontages in Central Reading; and
 - CR8: Small shop units in Central Reading.



6.0 Changes to Scheme - Drawing Comparison

6.1 This section s.73 application seeks key changes to planning permission ref: 221232 and listed building consent 221233 to enable material amendments to the approved redevelopment scheme. The proposed amendments will accommodate a revised internal configuration to the approved buildings. The proposed amendments are summarised below:

- Reduction to built form - reduced extension to 145/ 146 Friar Street.
- Changes to shop dimensions.
- Changes to dormer of extensions (145 & 146 Friar Street and rear extension of 5-15 QVS)

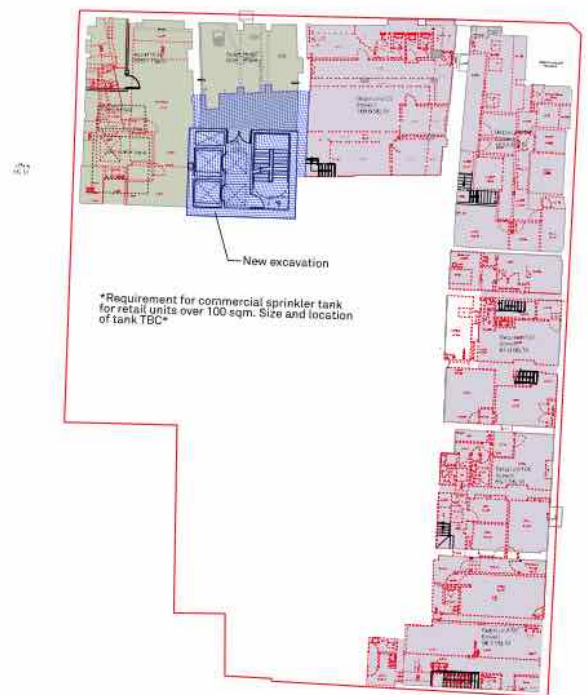
Changes to built form -

Approved Plans

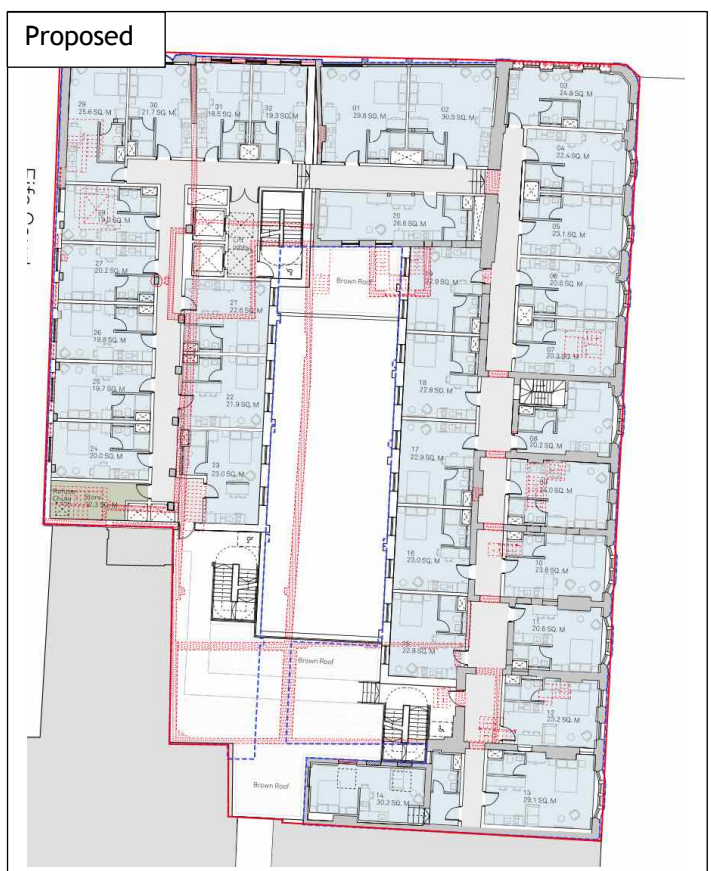
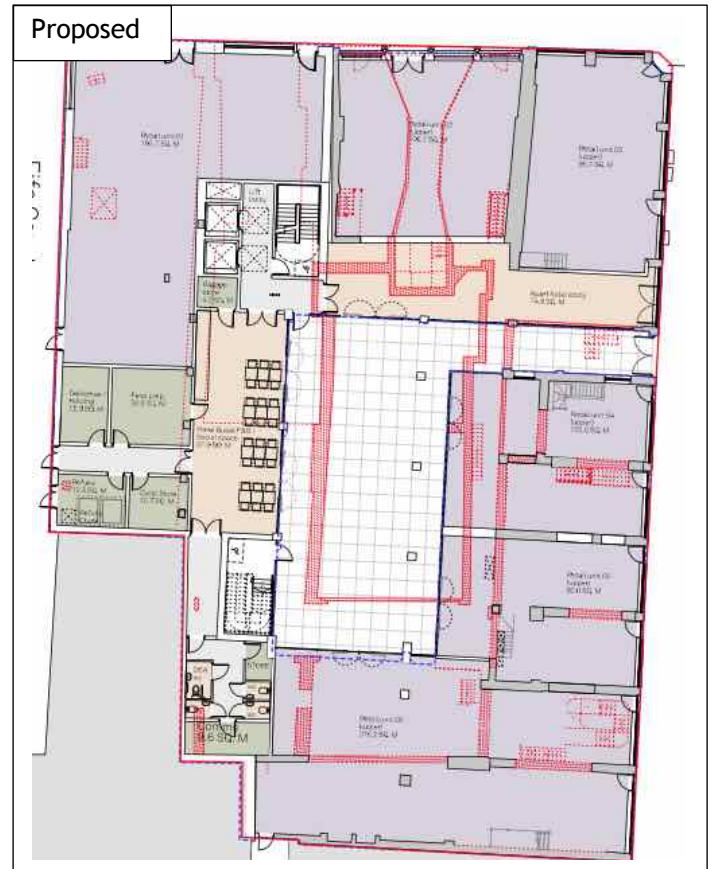
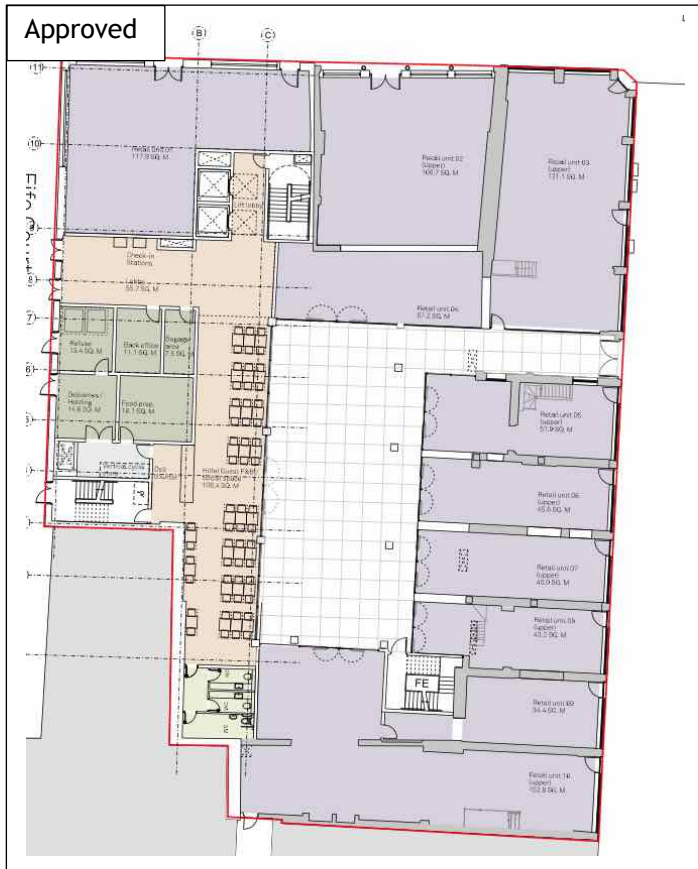
4.1 PROPOSED LAYOUT AMENDMENTS - BASEMENT

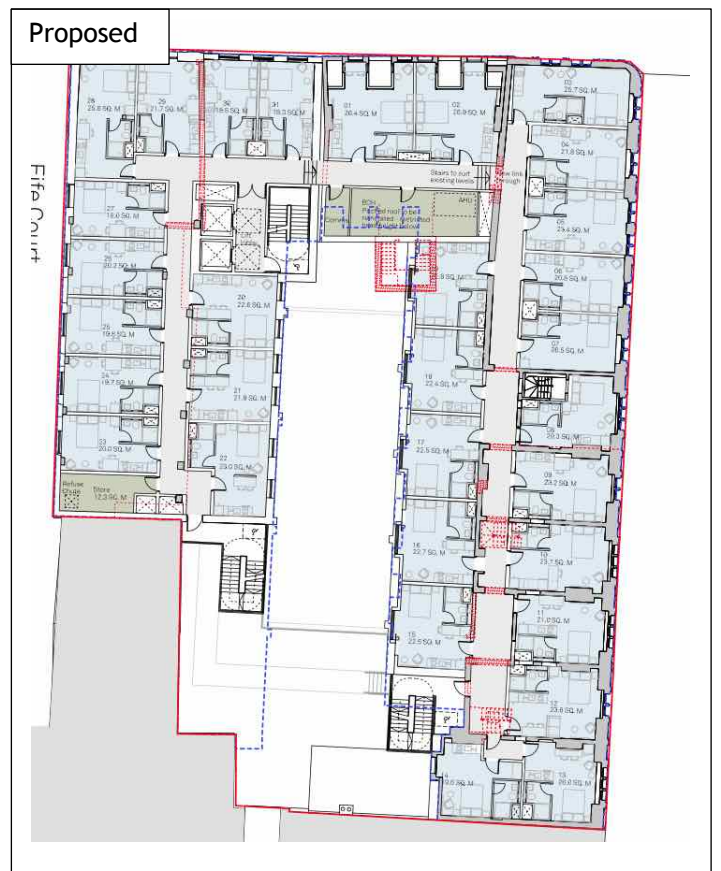
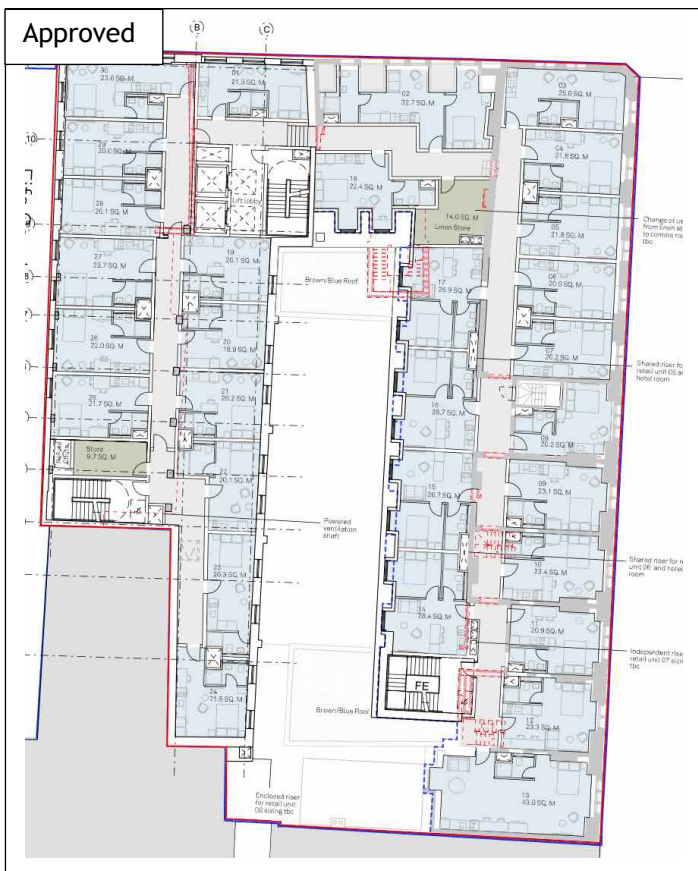
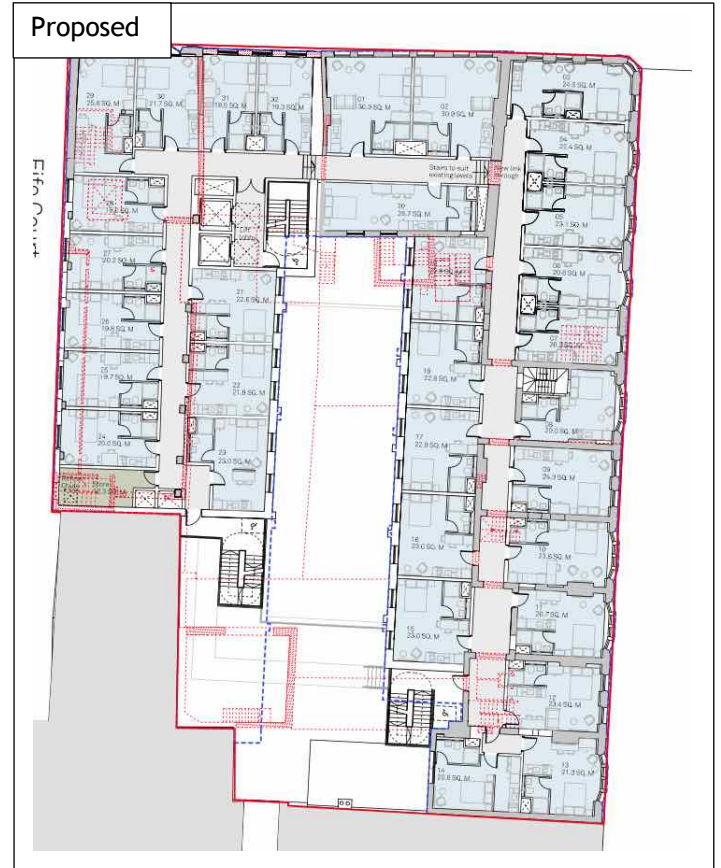
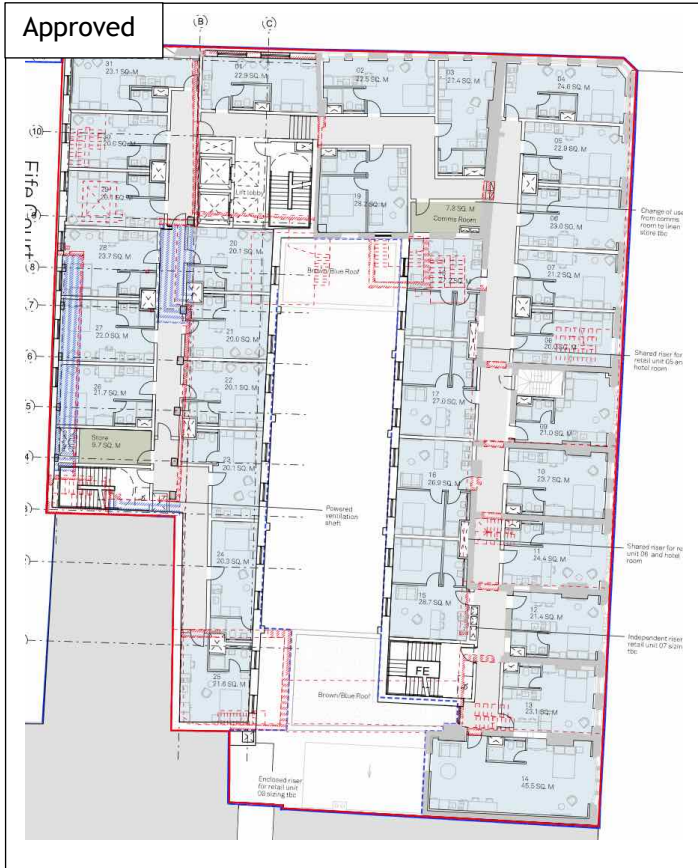


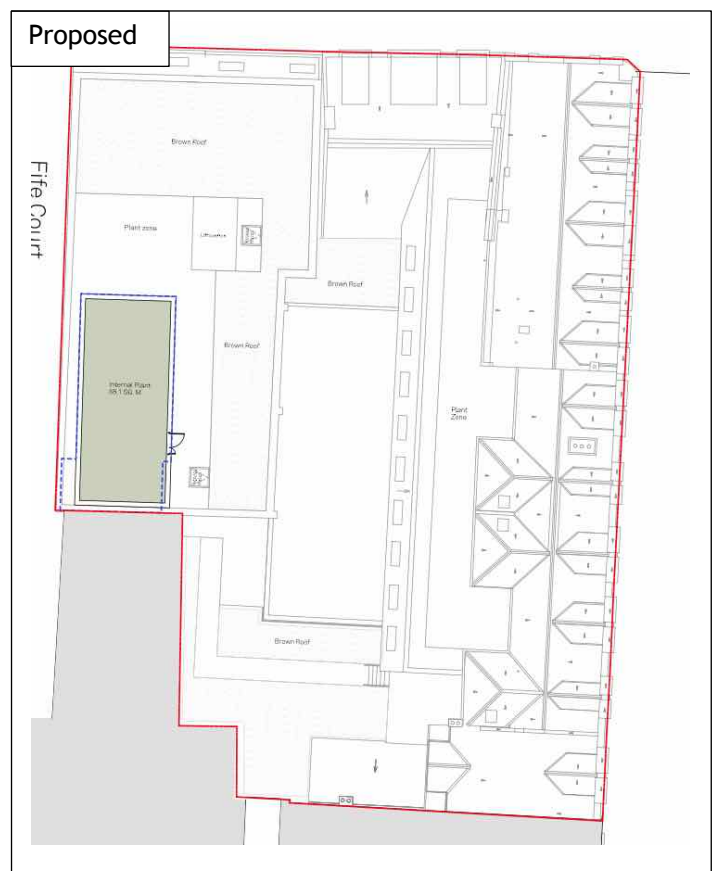
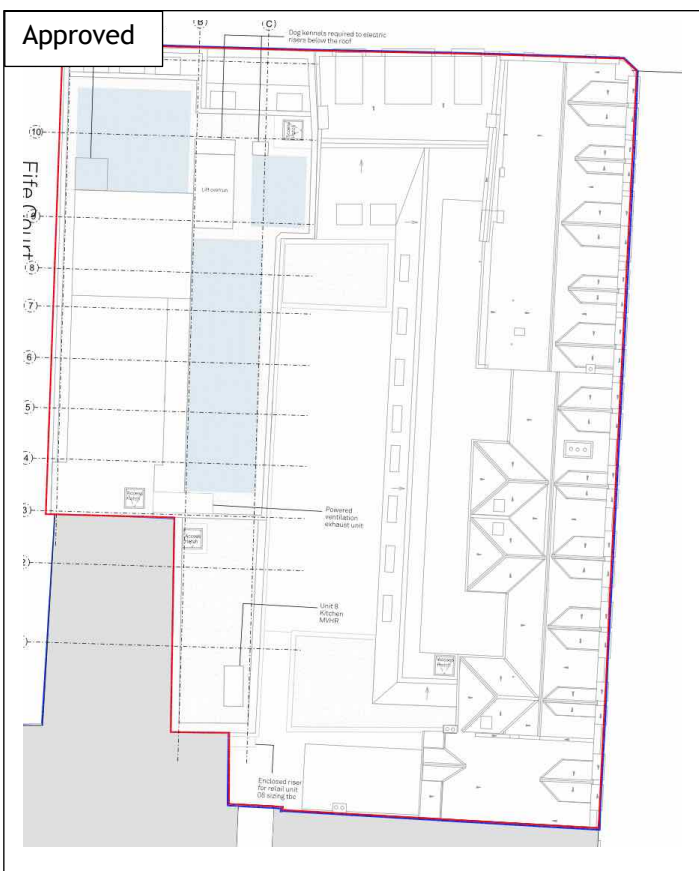
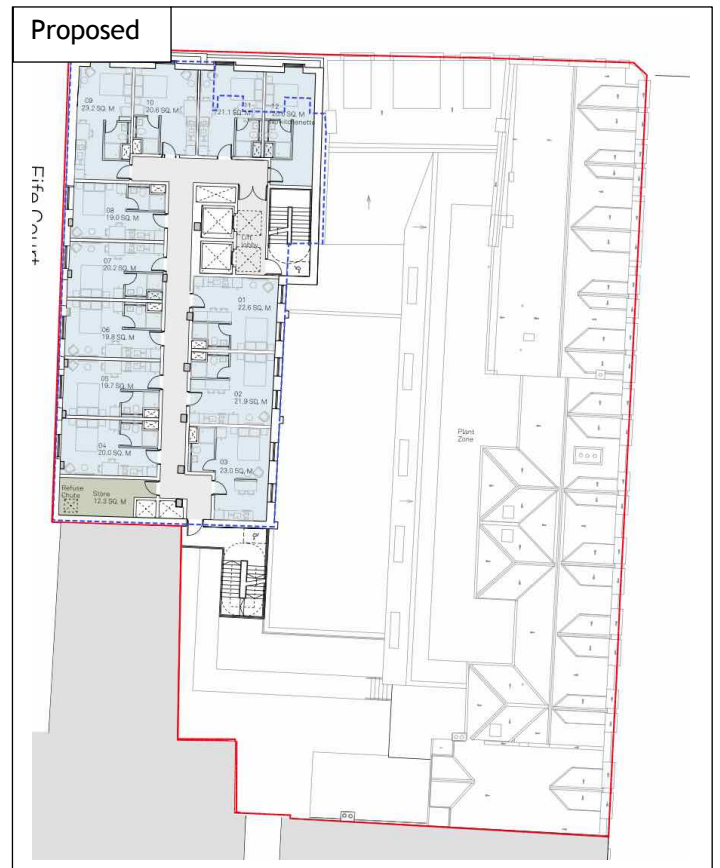
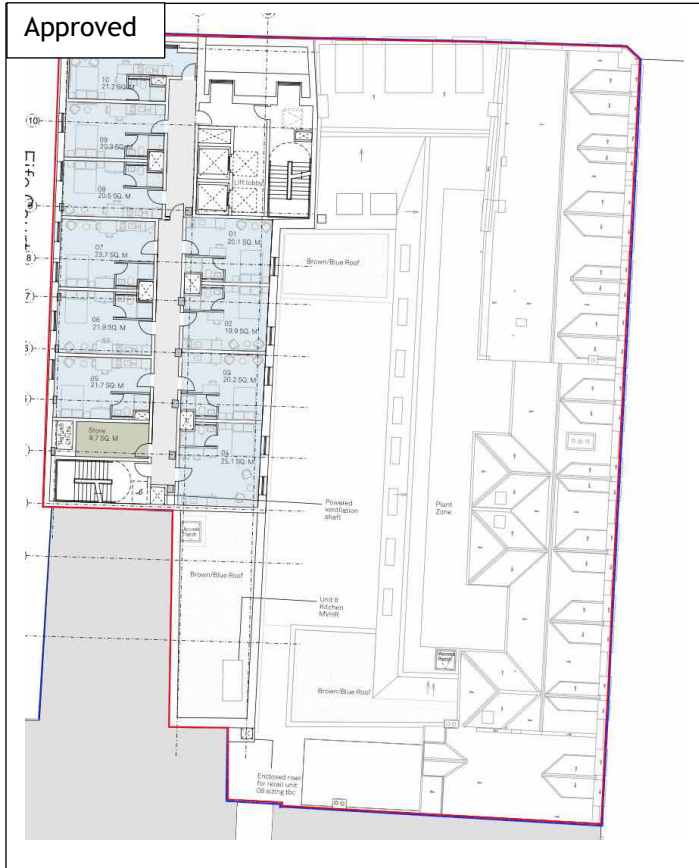
CONSENTED PLAN



AMENDED PLAN







7.0 Planning Considerations

7.1 This section of the Planning Statement summarises the relevant planning policy and guidance and assesses the proposals for compliance and other material considerations. The following key issues are considered to be the main points for consideration of this application, which are addressed in turn below:

1. Principle of development.
2. Demolition of 146 Friar Street
3. Design Considerations.
4. Heritage Impacts.
5. Impact on Amenity.
6. Open Space Provision.
7. Air and Noise Impacts.
8. Archaeology.
9. Transport and Parking.
10. Flood Risk.
11. Sustainability.
12. Servicing and Waste.

1. Principle of Development and Proposed Uses

General Development Principles

Policy

7.2 Paragraph 11 of the NPPF establishes the presumption in favour of sustainable development, whereby proposals that accord with an up-to-date development plan should be approved without delay. The up-to-date development plan in this case is the RBLP, which has been prepared with consideration to the NPPF and was adopted after the current NPPF.

7.3 **Policy CC1** Reiterates the presumption within the NPPF and will approve developments that are in accordance with policy. Proposals contrary to the development plan will be refused unless material considerations indicate otherwise.

7.4 The approved proposals align with the Central Reading strategy which recognises that there is a changing context to retail uses and the town centre leisure offer needs to expand. This will include arts and cultural provision, sport and recreation facilities, additional restaurants and evening uses that appeal to a wide range of users and continue to provide an 18-hour welcome.

Assessment

7.5 The general thrust of the RBLP is to encourage and enable the growth and diversification of central Reading, enhancing its role as a Regional Centre. The approved proposals will play an important role in achieving those objectives, providing enhanced retail offering, a compatible mix of town centre uses, providing visitor accommodation, enhanced public realm with cultural

offerings, bringing vacant buildings back into active use and protecting and enhancing key heritage assets.

- 7.6 The proposed alterations to the approved buildings are modest changes to the scheme - to be absolutely clear, the Applicant cannot bring forward the redevelopment works without these changes. The changes are material, but do not change the proposal submitted.

Summary

- 7.7 This s.73 Application and other supporting material show that the changes to the approved development proposals presented herewith represent sustainable development, are in accordance with the up-to-date development plan and should be granted planning permission accordingly.

Loss of Employment Floorspace

Policy

- 7.8 Para.122 of the NPPF requires planning decisions to reflect changes in demand for land and uses. Para.122 b) states that a positive approach should be taken to applications for alternative uses of land that is currently developed but not allocated for a specific purpose in a development plan.
- 7.9 The Site is not allocated for an employment use and falls outside of an identified Core Employment Area.
- 7.10 **Policy EM3** of the RBLP states that outside of Core Employment Areas, a number of matters will be considered for proposals where employment floorspace is to be lost. These matters were addressed as part of the approved applications ref: 221232 and listed building consent 221233 and have been dealt with as part of those approvals.

Assessment

- 7.11 The Site (majority) has been in the ownership of the Applicant for over 5 years, they also hold a comprehensive portfolio of properties in Reading Town Centre.
- 7.12 The uses that have been approved are employment generating and it is envisaged that the apart-hotel will create secondary and tertiary employment as a result of visitors making use of the town centre amenities or visiting for business needs.
- 7.13 Despite being outside the identified Core Employment Area and within the town centre, the site has been given approval for employment uses. The changes that are proposed relate in part to the size of the shops but will not have an impact on the overall thrust of the comprehensive redevelopment of the site.

- 7.14 The changes proposed as part of this section 73 application do not affect the employment proposals overall. The proposals will still enable the retention, restoration, and enhancement of heritage assets, that secure their longevity.

Summary

- 7.15 The lack of desirability of the existing use, the demand for apart-hotel uses and the opportunity for preservation and enhancement of a heritage asset, and the other benefits the scheme will deliver have represented a strong justification for alternative uses and led to the approval of the most recent applications ref: 221232 and listed building consent 221233. It is regretful that the office accommodation is lost, however, as it has clearly been established in previous applications, the current lack of occupation does not currently contribute to the area's office stock. The proposals are in compliance with the provision of the NPPF and RBLP Policy EM3, especially as they will generate jobs in their own right, as well as creating secondary and tertiary employment opportunities. This section 73 application does not change the employment floorspace position already approved.

Retail Use

Policy

- 7.16 At paragraph 86, the NPPF requires planning decisions to support the role of town centres, taking a positive approach to their growth and adaptation. The Site is located within Reading Town Centre **Policy CR1** states that for proposed main town centre uses, the following will apply:
- Retail development will take place in the Primary Shopping Area;
 - Major office development of over 1,000 sqm will take place in the Office Core; and
 - Other main town centre uses will take place in the Central Core.
- 7.17 Under **Policy CR7**, it states ground floor uses in primary frontages in Central Reading should be in use classes A1, A2, A3, A4, A5, C1, D1, D2 or related sui generis uses (as per defined Use Classes prior to 1st September 2020). Development must provide an active frontage with a display window or glazed frontage at ground floor level.
- 7.18 It should be noted as of the 1st September 2020 the use classes were altered, with Classes A1, A2, A3, B1(a-c), D1 and D2 forming Class E.
- 7.19 **Policy CR8** (Small Shop Units in Central Reading) notes that 'small shop units' make an important contribution to the diversity of the centre, with some areas characterised by small units of less than 75sqm - QVS is named as such. In such areas, 'characterised by small shop units, the amalgamation of individual shop fronts will not be permitted'.

Assessment

- 7.20 At the time of the determination of the application (December 2022), the Applicant had discussed the proposed use classes extensively with officers, however, officers deemed they would not accept the Applicant's suggested approach to uses and advised that in the future if

there are difficulties letting the units the Applicant is welcome to seek a variation of condition or standalone applications.

- 7.21 Since this point over 15 months of marketing has been completed in addition to the marketing that was being undertaken during the application determination. It is this extensive marketing and fully understanding the market that leads to the S73 application before the Council. The changes can be split into two:
- Retail Uses
 - Retail Unit Sizes
 - Retail Units - Internal Works

Assessment - Retail Uses

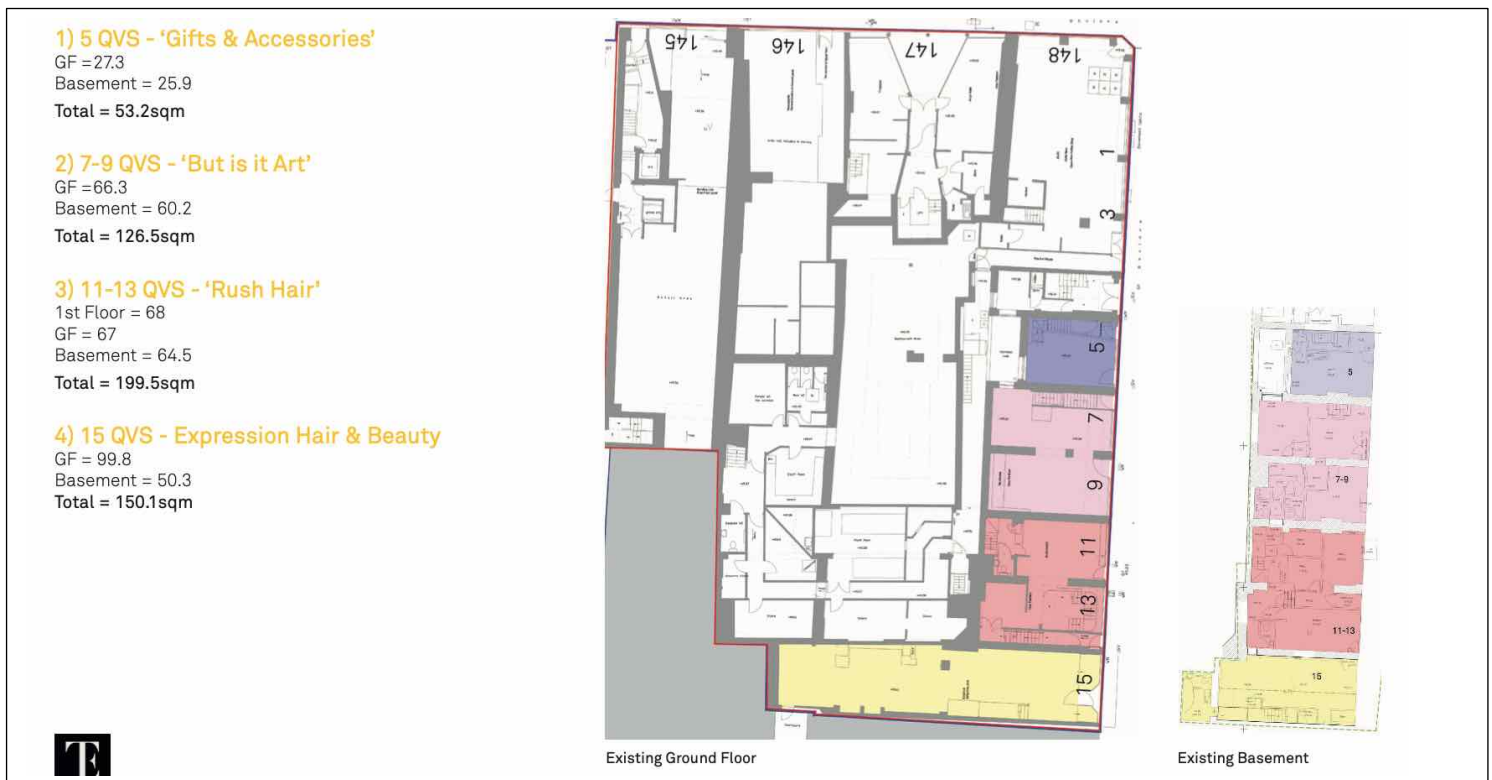
- 7.22 As noted, **Policy CR7**, it states ground floor uses in primary frontages in Central Reading should be in use classes A1, A2, A3, A4, A5, C1, D1, D2 or related sui generis uses (as per defined Use Classes prior to 1st September 2020). Development must provide an active frontage with a display window or glazed frontage at ground floor level.
- 7.23 It should be noted as of the 1st September 2020 the use classes were altered, with Classes A1, A2, A3, B1(a-c), D1 and D2 forming Class E.
- 7.24 As existing, the uses of the building fall in Class E and there are no restrictions in place on the existing uses, put simply, planning permission is not required to change the existing uses from retail (Ea) to say food and drink (Eb). The reason for this new use class was explained in the Government's White Paper - Planning for the Future. The change to use class was brought in to provide flexibility for business to adapt to meet changing economic and social needs, as well as providing the most valuable use to adapt to the changes to the high street.
- 7.25 What it did not do is state, 'Council's should keep applying rigidity to the high street and not allow changes'. As it stands, this proposal is seeking to extend the retail offering 145, 147 & 148 Friar Street and 1-15 Queen Victoria Street. Therefore, save for 146 Friar Street - the shop units are not being lost, they are simply being extended. The Applicant, reluctantly agreed to conditions 29 & 30 of the extant permission, which tied the retail units to specific uses. This however goes beyond the intention of the Government when they amended the Use Classes order - effectively the Council choose to add extra control, especially as this is not a new build scheme, quite the opposite, it is the extension and alteration of existing commercial units. We note the Council's Policy CR7, however, that was contained in a Local Plan adopted November 2019, which has been superseded by the Use Classes change in September 2020, to start to add this level of prescription goes completely and whole heartedly against Government policy and will make the site overly difficult to let. The option to provide marketing and for the perspective tenant to have to seek planning permission to use in Class E will result in the site providing difficult to let. There are already vacancies in the Reading town centre, there is a real concern for the high street, the application of an outdated policy will not do anything to arrest that decline and will place the entire viability of this scheme coming forward in jeopardy.

7.26 **Use Summary:** Therefore, in accordance with the lawful use and the significant marketing campaign completed, flexibility is needed, which is the same as the lawful Class E use of the site, this is not a new scheme, it is simply the extension and alteration of existing building.

Assessment - Retail Unit Sizes

7.27 The main change to the approved applications is the size of the retail units. The unit sizes have changed from that which was approved to the current proposals, as set out in the enclosed plans that form part of this S73 application.

7.28 The change means that there will now be the provision of three separate retail units along QVS at No's 5-15, whereas there are currently four existing units. It is noted that the approved (ref:221232) did propose 6 separate units (for note 145 to 147 Friar Street already are large retail units).



7.29 If we have regard to Policy CR8 it notes areas characterised by small units (less than 75sqm) and in these areas the 'amalgamation of shop fronts will not be permitted'. The existing shop units are shown on the drawing below.

7.30 If we take the existing arrangement on site, there are four retail units that are:

- 1-3 QVS (double shop)
- 5 QVS
- 7-9 QVS (double shop)
- 11-13 QVS (double shop)
- 15 QVS

7.31 Therefore, of the 6 original units, they no longer form single small units. If one then reviews the area of the said shops, only 5QVS is below 75sqm, with the remaining three all over 75sqm.

7.32 The Applicant has provided a marketing report during pre-application discussions (this contains economically sensitive information not for public release) but in summary it has found:

7.33 **Larger Units:** the following has been provided by the Applicant:

Provided below is a summary of the benefits to being able to accommodate larger businesses within our scheme, not only because it will increase our chances of re-letting the units but the wider implications it will have on Queen Victoria Street and the wider Reading town centre in the long term.

- This financial stability of the larger businesses reduces the risk of late or missed rental payments, providing a reliable income stream for the landlord to secure funding against. Thackeray have vast rent arrears throughout their Reading portfolio, all of which is attributed to the smaller independent businesses.
- Larger businesses have the funding to invest significant sums of money into their fitout which will enhance the overall quality of the property and make it more appealing to the public as well as raising the profile of the street and scheme. The majority of small businesses on Queen Victoria St who have low quality fitout and signage that damages the appearance of the Street – See Picture 1.
- Resilient to economic downturns due to their diversified operations and market reach. This resilience is not only advantageous but also ensures businesses can continue trading and prevents vacancies / empty units which is currently a major issue in Reading town centre – See Picture 2.
- Established customer base and marketing efforts generate a steady foot fall to the property. This increased visibility and customer flow will positively impact the performance of other tenants on Queen Victoria Street and the wider town centre. The smaller businesses are more prone to change in ownership, closures and re-locations. High turnover is disruptive and leads to increased vacancy periods, challenges in finding new tenants, and property security risks, as exemplified by The Harris Arcade – See Picture 3.
- The larger businesses have experienced and professional management teams, reducing the likelihood of issues related to property maintenance, adherence to lease terms, and other operational concerns.
- Serve as an anchor tenant, drawing customers and other businesses to scheme and wider Queen Victoria Street. The presence of a well-known anchor tenant can positively impact the perception of the street / retail parade.
- The shop front/ internal fit out is heritage positive and high quality, especially when compared to others. It has exposed brick-work, stone floor, heritage shop front; it is a significant enhancement to the street scene and the calibre and standard of fitout, which tenants simply cannot fund and based on past performance, have sought to undertake. (Pictures 4,5 and 6)



7.34 **Marketing:** The marketing campaign undertaken over the last three years has proven the Applicant cannot be ring fenced in who they can let the building to, there have been no interest at even discount to market rents for the small retail units. Only interest shown was for larger units.

7.35 **Interest:** the Applicant has two offers from national retailers that will anchor the scheme. However, the interest secured will fall away if they do not get permission to vary the use class (addressed below). The wave of further bankruptcies, store closures, and CVA's attributed to the rising interest rates, Cost of Living Crisis, and Political uncertainty has not been fully realised yet so the decline in the high street is going to continue to snowball. The Applicant needs the ability to re-let the scheme, having restrictions put in place to prevent certain uses operating on the high street counteracts this and makes re-letting an almost impossible task.

7.36 The independent retailers were a key aspiration for the Applicant and one they have tried to cultivate since the inception. However, as Officers are aware, the Applicant holds a sizeable holding in Reading and across the country. They have encountered significant periods of vacancy or non-payment of rent from many of the independents, including offering free rent.

As the cost to build has risen together with interest rates, the lenders now will not fund the development without secure covenants in place. We note the significant vacancies in Harris Arcade and the concerns over 150 Friar Street (Applicant owns and is occupied by an independent) - offers from a well-funded and established business have been made and is the only viable way to move this scheme forward.

7.37 The proposed tenants for the amended retail units, although not falling within the original aspiration for the site, offer robust tenants that will attract people to this part of the town centre and will achieve the vision of attracting businesses, shoppers, visitors, workers, students and investment into Reading Town Centre.

7.38 Notwithstanding the above, if one reviews Policy CR8, it seeks to protect 'shop fronts' - as noted in this submission, the shopfronts would be upgraded and restored to former historically appropriate appearance, however, the 'shop fronts' will not be amalgamated, and the works of improvement will result in a material benefit to the frontage.

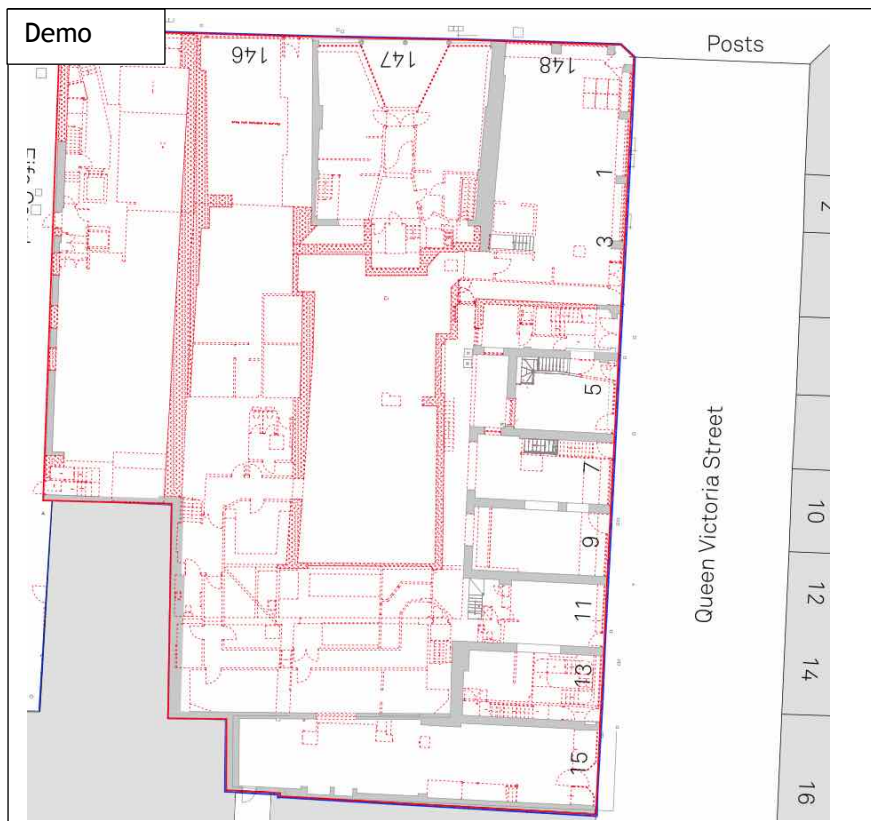
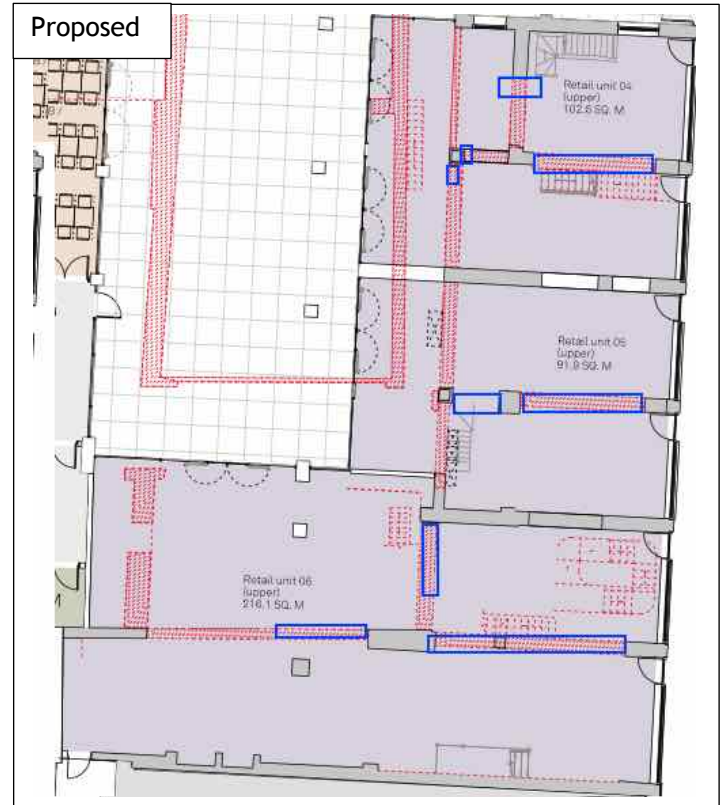
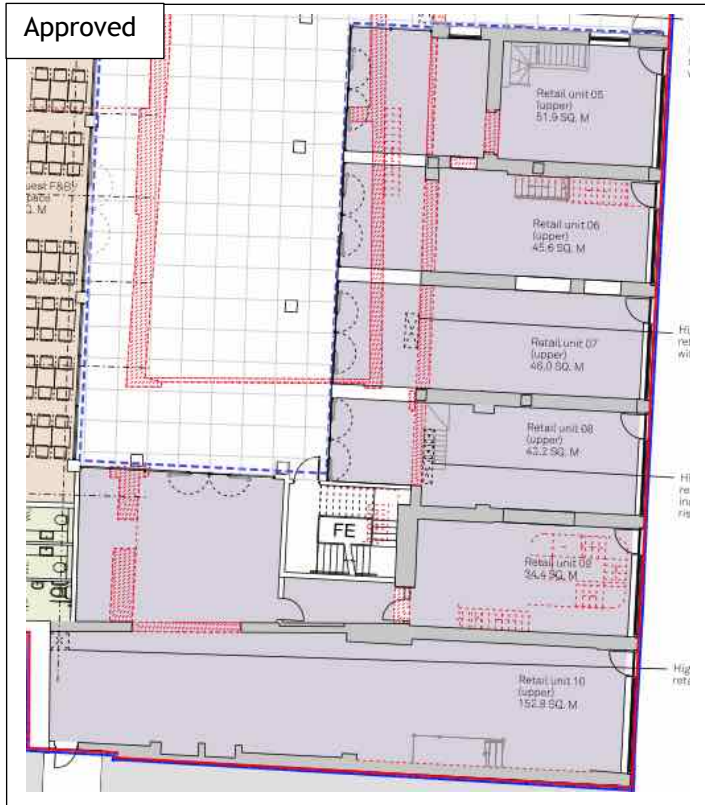
7.39 **Unit Size Summary:** we note the 'as approved' scheme, which was based on an original concept scheme from mid-2020, submitted during the Covid19 pandemic, since then the high street has evolved significantly and what was potentially feasible then, is not longer, with many similar concepts failing - the Applicant does not want to fall into such a category. Since then, nearly four years has elapsed and extensive marketing has been completed that the small units are not desirable nor viable, therefore, without the change, quiet simply this scheme fails to come forward. But in any event, the scheme, when compared to the existing, will only lose one small shop, the rest being 125sqm to 199sqm in size.

7.40 **Officers Response:**

It is considered that the provision of 3 separate retail units along Queen Victoria Street at No's 5-15, in the context of there being 4 existing units (whilst also mindful of 6 separate units being approved as part of 221232), is likely, on balance, to be considered appropriate in overall terms, whilst acknowledging this would not comply with Policy CR8 (Small Shop Units in Central Reading).

Assessment - Retail Unit Internal Works

- 7.41 To facilitate the re-designed units, the Applicant has sought to keep changes to an absolute minimum and only those necessary - it however should be noted that the Heritage Consultant's view on the internal changes is 'no harm at all' as the changes are so modest. But against this background, a direct comparison of the 'existing' & 'approved' and 'proposed' is set out below. If one has regard to the floor plan, the changes to the openings are shown in blue boxes - the changes are modest - but the demolition context should be shown that is below.



- 7.42 It noted there will be some modest additional openings are proposed, however, this should be considered in the context of the former decision and the significant heritage improvements to the shop fronts and retention of nibs to allow existing openings to be clearly defined - the below is taken from the DAS.

The proposed design for the new shop fronts to the Queen Victoria Street and Friar Street elevations has been informed by the historical photographs that date back to 1939. It is considered that these photos show the shop fronts that would generally have been installed from when the building was originally built.

The intention is to create a uniform appearance across the site and provide a template for the wider Queen Victoria Street terrace.

From the photos there is evidence that the shops were generally a single bay with the larger units generally being on either end of the terrace where the corners may have incorporated multiple bays. Further, the photos show that the shop fronts generally had a single entrance door and this was positioned to one side of the repeated bay. The doors were generally set back from the pavement, creating a recessed doorway. The remaining glazing was generally one large glazed panel with decoration internally depending on the shop.

Two built features further define the design. Firstly, a plinth below the shop front window is evident which appears to be tiled with a plain black tile. Secondly, the signage above the shop front is consistent with decorative moulding under the terracotta plinth at 1st floor level.

Although the colour of the shop front and signage is not known, it is evidently dark and most probably consistent across the terrace.

All of the above observations ensure that the street elevation is coherent and consistent.

The proposed new shopfronts will largely replicate these observations with a black painted timber framed shopfront of the same configuration and composition as can be seen in the photos. The timber fascia and signage will be reinstated. The main deviation will be that the recessed doorway will not be replicated as this is likely to cause a hidden recess that can not be monitored.



- 7.43 The Council advised that it will be important that these units should review as to whether the precise internal works are appropriate in listed building terms (e.g. in terms of reversibility) and the Applicant has sought to retain nibs, roof delineation and layout - therefore, the modest walls omitted can easily be re-introduced.
- 7.44 **Summary:** the changes made have been reviewed by the appointed Heritage Consultant, who has concluded the internal changes will not result in harm. Further, the reversion of the internal changes are logical and the retention of nibs, roof delineation and layout, as well as the enhanced shopfronts is a significant benefit that would off-set some very modest internal changes.

Summary

- 7.45 The retail provision proposed is an appropriate use within the town centre and will continue to ensure the enhancement of its vitality and viability. The proposals are therefore in accordance with the NPPF and policies CR1, CR7, CR8 and RL2 of the RBLP

Assessment - Courtyard

- 7.46 There are no material changes to the public courtyard and is consistent with the consented layout (ref: 221232), which is welcomed by the LPA and the reduction of built form will enhance the courtyard openness.

Apart-Hotel Use

Policy

- 7.47 As above, paragraph 85 of the NPPF supports the adaptation of town centres and promotes their long-term vitality and viability by allowing them to grow and diversify that can respond to industry changes and allow a suitable mix of uses.
- 7.48 **Policy RL1** emphasises this in encouraging a broader range of facilities and residential uses on upper floors and **Policy CR1** supports other main town centre uses in the Central Core.
- 7.49 **Policy CR4** states that the Central Core will be the prime focus for major leisure, culture, and tourism development.
- 7.50 **Policy CR6** requires apart-hotel development outside of Use Class C3 to be located within the Central Core.

Assessment

- 7.51 The apart-hotel uses have been approved as part of the most recent applications ref: 221232 and listed building consent 221233 and these will add to the variety of uses and attractiveness of the town centre for visitors and workers. The application before you has reviewed the layouts and has reviewed the circulation spaces, this review has yielded a further three rooms - representing an increase to 107 rooms - the efficient replanning has yielded further rooms with a reduction in built form.
- 7.52 An increase of 3 rooms (3%) is very modest and will not result in a material change.

Summary

- 7.53 The apart-hotel use remains an integral and important part of the proposal, however, as a result of modest efficiencies on layout, the number of rooms increases to 107 (+3). Further, the improved and welcoming entrance from QVS is welcomed over the use of Fife Court, which was a concern to future operators. The use is a compatible and supporting use for this location within central reading and will assist in enhancing the vitality and viability of the centre. The proposals comply with the provisions of the NPPF and RBLP Policies RL1, CR1, CR4 and CR6

2. Demolition of 146 Friar Street and Alteration to 145 Friar Street

Policy

- 7.54 **Policy EN4** notes that where some loss or harm to locally important heritage asset is permitted, recording of the heritage asset should be undertaken. Additionally, replacement buildings are required to draw upon heritage elements of the previous design, incorporating historical qualities that made the previous building significant.

Assessment

- 7.55 The demolition works proposed have already been approved in accordance with extant consents there are no changes to the demolition works, save for the modest changes proposed internally and already addressed.
- 7.56 The demotion and alteration of these buildings remains the same and is not altered as part of this s.73 planning application.

3. Design Considerations

- 7.57 There are several key separate elements to the design of the proposals that warrant individual focus. The following elements of the proposed external works are addressed in turn below. The internal works are discussed under heritage considerations, we also refer readers to the DAS, Heritage Statement, and also the drawings presented.

- Repairs/works to the principle facades;
- Shop fronts;
- Three-storey rear extension with mansard;
- Part-single, part-two storey rear addition; and
- Public Square.
- Rebuilding of No.146.
- Extension to No.145.

Policy

- 7.58 The NPPF identifies at paragraph 126 that good design is a key aspect of sustainable development.
- 7.59 Paragraph 130 requires developments to function well and be visually attractive, be sympathetic to local character, whilst not preventing appropriate innovation or change. Proposals should use street layouts, spaces, building types and materials to create distinctive places.
- 7.60 **Policy CC7** reflects the national position in seeking high quality design, maintaining and enhancing the character and appearance of the area within which it is located.

- 7.61 In terms of density, **Policy CC6** states that scale and density to be related to the level of accessibility by walking, cycling and public transport to a range of services and facilities. The supporting text for the policy notes that the highest levels of accessibility in Reading are within the town centre.

Assessment - Repairs/works to the principal facade

- 7.62 Urgent repairs and replacement works will be undertaken to the deteriorating architectural detailing of the building facades, particularly along QVS. These will be sensitive like-for-like replacements and retaining and repairing existing elements where possible, representing a sympathetic restoration and enhancement of character of the existing buildings that is currently underway.
- 7.63 A pedestrian passageway to the new public square will be created from QVS. The repairs and works to the principal facade will be the same as the approved scheme and will not incur any changes as a result of this s.73 application.

Assessment - Shop fronts

- 7.64 Care has been taken in the design of the ground floor shopfronts to closely reflect the design, scale and detailing of the original shopfronts of the QVS terrace, as understood from historic photographs and records.
- 7.65 The proposals seek to reinstate the historic shopfront design and uniformity, creating a unique historical character to this part of QVS in the style of boutique heritage retail. The existing shop fascia will be retained and revealed with the removal of inconsistent later signage additions and alterations. Each shopfront will include consistent shop name lettering and street number engraving. This will recreate the original uniformity of the QVS frontage and bring back the former historic character and glory.
- 7.66 The proposals will retain the key architectural detailing of the shopfront and return to their historic appearance, such as the painted black cast iron pillars, first floor architraves and the ground floor shop front rhythm.
- 7.67 The changes proposed as part of this s.73 application do not change the proposals for the shopfronts.

Assessment - Three-storey rear extension with mansard

- 7.68 The proposed rear extension has been specifically designed to be sympathetic in scale, massing, design, and materials, to that of the host building and surrounding buildings. At three-storeys in height, with additional mansard roof, the extension will be subservient to the main building of 1-15 QVS and will sit below the existing rear roofline, respecting the predominant local skyline. The proposals are generally consistent with the most recent application, noted as being appropriate in scale and design. The change made is a reduction to number of dormers, reverting to a single dormer per bay as per the original approved scheme, albeit wider dormers.

7.69 The proposals represent an appropriate and sympathetic design response that will respect and enhance the listed building and provide a high-quality visual and functional environment that is secure and accessible to all, in compliance with the NPPF and RBLP policies.

Approved APP1



Approved APP2



Proposed



Assessment - Part-two, three and four storey with mansard rear addition

7.70 The rear addition within the public square mirrors the design and architectural detailing of the rear extension of 1-15 QVS, whilst introducing its own unique features and interest. The addition frames the western edge of the public square, providing the food and beverage offering.

7.71 This s.73 application does involve some changes to the mass and bulk, but still consistent with the previous approvals, this is best shown to compare the proposed and approved below that shows the internal courtyard of 145 and 146 Friar Street - the mass is actually reduced. The stairs will be of a lightweight permeable appearance therefore reducing apparent mass



7.72 Again, the external change to 146 Friar Street changes are modest and still consistent with the previous approvals, again best compared below.



7.73 The proposals represent an appropriate and sympathetic design response that will respect and enhance the listed building and provide a high-quality visual and functional environment that is secure and accessible to all, in compliance with the NPPF and RBLP policies.

Assessment - 145 and 146 Friar Street

7.74 No.146 (considered of no architectural merit) will be demolished, and No 145 (considered of some architectural merit) will be redeveloped whilst still retaining the majority of the existing built form and adding two floors. Again, to show comparison is best to compare approved and proposed below. This s.73 application does involve some changes but these are simply to the mansard and dormers of 145 and 146 Friar Street.

Approved



Proposed



- 7.75 The front (rear) of No 145 would be retained with a new shopfront to the ground floor. The current modern mansard roof would be replaced with a traditional upper floor, designed with proportions akin to early 20th Century buildings. Above this a new mansard roof extension would be introduced in a material similar to that of No 146. This will have a harmonious effect in terms of the roofline, which will continue to appear animated with slight height differences.
- 7.76 The additional massing that has been approved is well designed and matches the current rhythm of the street and townscape. While providing additional accommodation for the Hotel, it would have a positive effect on the street frontage by removing poorly designed shopfront and modern roofs. There would be no impact on the listed buildings or their settings and the proposal would result in enhancements.
- 7.77 Overall, due to the appropriate scale, carefully considered and high-quality design, the introduction of additional massing over No 145- 146 would not affect the heritage significance of the grade II listed buildings on the site.
- 7.78 The mass and bulk changes as part of this s.73 application align with earlier approvals and the overall street scene.



Summary

- 7.79 The material submitted with this application shows that due care has been taken to design proposals that strike an appropriate balance with desirable uses; preserve and enhance an iconic listed building; make effective use of the Site and respond to constraints; and create a safe, attractive, and well-designed place for future enjoyment by the public and visitors. The proposals reflect the historic character, built form, street layout, design features, materials and setting of the surrounds and utilise high-quality materials and modern sympathetic design. The design proposals fully accord with the NPPF and RBLP Policies CC6, CC7 and CR2.

4. Heritage Impacts

Policy

- 7.80 The NPPF requires proposals affecting statutory heritage assets to describe the significance of the assets (paragraph 194). Paragraph 199 states that great weight should be given to the conservation of designated heritage assets when assessing development. Paragraph 202 states that where less than substantial harm would be caused to significance, then public benefits including optimum viable use should be considered. **Policy EN1** of the RBLP seeks the protection and enhancement of the historic environment. All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings. The Council will proactively seek solutions for assets at risk, including consideration of appropriate development schemes that will ensure the repair and maintenance of the asset.
- 7.81 **Policy EN6** states that, in areas characterised by heritage assets, new development will make a contribution to the historic character by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development.

Assessment

- 7.82 As identified earlier in this statement, the buildings of the application site are Grade II listed, under list entry 1113488 and 1113564. The listings date from 1978 and focus on the façade detailing and material of the buildings, with particular mention to the shop front designs.
- 7.83 This s.73 application is accompanied by a Heritage Statement prepared by Revive and Taylor, which is an addendum to the Heritage Statement prepared for the planning and listed building consent applications ref: 221232/221233. This provides a comprehensive historic assessment of the heritage assets, determination of their significance and value, and assesses the potential impact of the proposals on the assets. The Heritage Statement should be referred to for full details of the assessment.
- 7.84 The HS assesses that the S73 application changes to the proposals will have both positive improvements on the significance of the assets. It notes that the negative impacts have been mitigated, if not avoided, by the sympathetic design and considerable enhancements brought about by the benefits of the proposals.

Summary

- 7.85 The proposals represent a unique opportunity to save and restore these important heritage assets, breathing new life into the Listed Buildings and this part of the town centre. The significant heritage and public benefits of the proposals far outweigh the less than substantial harm arising to the heritage significance and result in a net benefit and enhancement to the current situation. The proposals are considered to comply with relevant tests and requirements of the NPPF and Policies EN1 and EN6 of the RBLP.

5. Impact on Amenity

Policy

- 7.86 Paragraph 130 f) of the NPPF promotes development that will create a high standard of amenity for existing and future users.
- 7.87 **Policy CC8** of the RBLP stipulates that development Must not cause a detrimental impact to living environment of existing or future residential properties in terms of (inter alia):
- Privacy and overlooking;
 - Access to sunlight and daylight;
 - Visual dominance and overbearing effects of a development;
 - Harm to outlook;
 - Artificial lighting; and
 - Security and Safety.

Assessment

- 7.88 This section 73 application does not change the impact on amenity position already approved.
- 7.89 There are several key elements of the proposals and amenity tests that have been addressed as part of their design and assessment. These are taken in turn below.

Privacy and Outlook

- 7.90 Given the existing uses and nature of the functional development at the rear of the Site, there are limited existing properties beyond the Site that currently overlook the Site. The closest existing residential occupiers are those in the upper floors of 32 Friar Street and 1 Station Road.
- 7.91 The use of single direction glazing can be used to mitigate any concerns regarding instances of interface windows of the apart-hotel having direct-window to windows (7.5m gap), albeit this an apart-hotel and therefore temporary accommodation and not residential use, therefore there should be no major cause for concern.

Security and Safety

- 7.92 The Site's town centre location benefits from existing natural surveillance of a busy high street and existing on-street CCTV network. The retail frontages of QVS and Friar Street will therefore benefit from this and additional security measures that may be implemented by individual occupiers, such as internal CCTV.
- 7.93 The rear public square will have gated accessways, which will be open for the majority of the day and trading hours of the associated retail units. Access will be restricted during night-time hours to provide additional security for the rear retail units and the access to the apart-hotel. Adequate lighting will be provided in passageways and within the market square to ensure a safe and welcoming environment as well as clear visibility for CCTV cameras. Further information is provided within the accompanying DAS.

Summary

- 7.94 The proposals are considered to comply with daylight and sunlight requirements and wind/microclimate matters and these are addressed fully in the accompanying reports that support this planning application submission. The proposals are considered to comply with the NPPF and Policy CC8 of the RBLP.

6. Open Space Provision

Policy

- 7.95 In seeking to serve community needs, paragraph 93 a) of the NPPF requires decisions to plan positively for the provision and use of shared spaces, such as meeting spaces and open spaces.
- 7.96 **Policy EN9** of the RBLP requires all new development to make provision for appropriate open space based on the needs of the development.
- 7.97 **Policy EN10** states that in areas with relatively poor access to open space facilities (including as a result of severance lines), new development should make provision for, or contribute to, improvements to road and other crossings to improve access to green space and/or facilitate the creation or linking of safe off-road routes to parks.
- 7.98 In relation to public realm in Central Reading, **Policy CR3** requires development to make a positive contribution and will be assessed against the following:
- All sites greater than 1ha will need to provide new public open space or civic squares integrated with surrounding development;
 - New open spaces should be of a size and shape to accommodate imaginative uses. Where appropriate, provision of water features, trees, other planting and hard landscaping will be expected;
 - Public realm should conserve and enhance the historic environment of the centre and significance of heritage assets therein and their setting.
- 7.99 Section 7.7.7 of the Reading Open Space Strategy recognises the importance of town centre spaces and their role in creating urban sanctuaries in which people can relax, meet, play or take a break from working or shopping.

Assessment

- 7.100 There will be no material changes to the courtyard as proposed.
- 7.101 The public square will be integral to the proposed development; providing active, useable public realm in the heart of Central Reading, complementing the retail and apart-hotel uses and acting as a destination in this part of the town centre. The square will be a hub for respite for shoppers and workers within the town centre, a place to meet others, relax, eat, and socialise.

- 7.102 **Biodiversity:** An ecology assessment accompanied the consented scheme noted there are no signs or evidence of protected, priority or rare species during either survey and habitats were considered highly unlikely to support such species.
- 7.103 The scheme proposes brown roofs where possible and planting to the front, which will aid and improve biodiversity on site, albeit it is acknowledge there is limited scope for ecology improvements, however, best efforts will be made to improve biodiversity with planting, which will make a modest contribution where currently there is no greening. The areas of brown roofs will remain the same as consented.

7. Air and Noise Impacts

Policy

- 7.104 NPPF paragraph 185 seeks to protect the natural environment, including preventing new and existing development from unacceptable or adverse impacts of air or noise pollution. RBLP **Policy CC8** also seeks to safeguard existing and future residents from detrimental impact from noise and disturbance, dust and fumes, vibration and smell. **Policy EN15** states that where a development would introduce sensitive uses into, or intensify such uses within, an Air Quality Management Area (AQMA), detrimental effects on that use should be mitigated. Planning obligations may be used to secure contributions to tackle poor air quality or for air quality monitoring.
- 7.105 Where noise generating equipment is proposed, RBLP **Policy EN17** requires the noise source specific level (plant noise level) should be at least 10dBA below the existing background level as measured at the nearest noise sensitive receptor.

Assessment - Air Quality

- 7.106 There are no changes to the plant proposed for the scheme nor location.
- 7.107 Much of Reading is designated as an AQMA and the Site falls within such an area. The application is accompanied by an AQA, which assesses the impact of the proposals during construction and occupation, both on existing neighbouring uses and future occupiers of the development.
- 7.108 The AQA concludes that the site is a 'low risk' site and the impact of dust soiling and particulate matter from construction activities can be reduced to negligible levels through recommended mitigation measures. The proposals will include mechanical filtered ventilation for apart-hotel rooms on the Friar Street façade and unopenable windows to these rooms.
- 7.109 The proposals are therefore in accordance with the requirements of the NPPF and policies CC8 and EN15. Please refer to the submitted AQA for further details of the technical assessment and recommendations.

Assessment - Odour and Ventilation

- 7.110 The future tenants and what uses they will seek to operate within has not been secured and as this scheme is at planning stage, the future ventilation to be fitted will not be known until post approval and the Applicant goes to market. However, in preparing the scheme, a M&E assessment that details the ventilation strategy accompanies.

Assessment - Noise

- 7.111 This application is accompanied by a Noise Impact Assessment (NIA), produced by KP Acoustics. This assesses the impact of the changes to the proposals as per this s.73 application, on existing sensitive receptors, as well as the conditions for future occupiers of the development, notably the proposed apart-hotel. The NIA has focussed on the impact of proposed plant, the potential noise generation from activity in the public square and the retail units themselves.
- 7.112 The NIA makes several recommendations to ensure appropriate noise levels are achieved for the apart-hotel use. The NIA confirms the method of noise reduction required and a specification for the plant enclosure louvres.

Summary

- 7.113 The NIA concludes that, with the incorporation of the recommended mitigation, the proposals will ensure noise levels to sensitive receptors will remain below the identified standard and requirements of policy and will not give rise to detrimental noise impacts. This will protect the amenity of existing surrounding residential and commercial uses as well as the proposed future occupiers of the apart-hotel. Furthermore, the air quality assessment and ventilation strategy ensure the amenities of the future guests are protected. The proposals therefore comply with the NPPF and RBLP policies CC8 and EN17.

8. Archaeology

Policy

- 7.114 Paragraph 189 of the NPPF requires an appropriate desk-based assessment for sites that have the potential to include heritage assets with archaeological interest. The Site falls within an identified Area of Archaeological Potential within which, RBLP Policy EN2 requires applicants to identify and evaluate sites of archaeological significance and assess the impacts of development proposals. Where remains cannot be preserved in situ, they should be excavated, investigated and recorded. Where appropriate, Section 106 agreements will be negotiated to protect, enhance and interpret archaeological remains.

Assessment

- 7.115 The changes proposed as part of this section 73 application will not change the outcome of the Archaeological Desk-Based Assessment submitted with the previous applications, which assesses the potential for the Site to contain historic remains and is reflective of its location within an identified Area of Archaeological Potential. The Assessment identifies the potential for remains from the early medieval period onwards but does not identify any over-riding archaeological constraints that would prohibit or significantly constrain the Site's development.

Summary

- 7.116 The assessment of the archaeological potential and the implementation of appropriate investigative measures is in line with the requirements of the NPPF and Policy EN9 of the RBLP.

9. Transport and Parking

Sustainable Transport

Policy

- 7.117 The NPPF promotes sustainable modes of transport and opportunities for development to increase the use of walking, cycling and public transport as modes of travel. Paragraph 106 a) supports an appropriate mix of uses across areas and larger sites with the aim of minimising the number and length of trips. Paragraph 110 a) seeks to ensure that appropriate opportunities to promote sustainable transport modes in developments have been taken, that safe and suitable access to the site can be gained by all users and that acceptable mitigation can be provided where required.
- 7.118 **Policy TR1** states that developments should promote and improve sustainable transport facilities, encouraging walking, cycling and the use of public transport.
- 7.119 **RBLP Policy TR3** states that proposals involving either the construction of a new site access, or a material increase in the use of an existing site access, directly onto the Classified Highway Network will not be acceptable if they would be likely to result in the encouragement of the use of the network for short local trips or compromise the safe movement and free flow of traffic on the network or the safe use of the road.
- 7.120 In relation to cycle routes and facilities, **Policy TR4** requires developments to improve access for cyclists to, from and within the development. Development should not detrimentally affect identified cycle routes, of which both QVS and Friar street are.

Assessment

- 7.121 The changes proposed as part of this s.73 application do not change the outcomes of the Transport Statement.
- 7.122 The Site is in a highly accessible location in the heart of the town centre, with immediate access to town centre shops, services and facilities. There is extremely good access to public transport with the busy bus route along Friar Street and Reading Railway Station approximately 250m to the north. The pedestrianised nature of QVS and other shopping parades, as well as the traffic restrictions along Friar Street, make the area surrounding the Site pedestrian and cycle friendly, enhancing the safe accessible nature of the Site. The Transport Statement submitted with this application provides further detail on the accessibility of the site via pedestrianised areas, extensive cycle network and public transport provisions.

- 7.123 The Transport Assessment concludes that the proposals will have a negligible impact on the operation of the surrounding highway and transport networks and that the proposed car-free nature of the development is acceptable. There will be no alterations to the highways network or impact on highway safety in this regard. The collection and disposal of waste and servicing arrangements are addressed later in this Statement.

Summary

- 7.124 The location of the Site and the proposed uses are compatible and together utilise and encourage the use of sustainable modes of transport and will have negligible impact on the local highway and transport network. The proposals therefore accord with the NPPF and RBLP Policies TR1, TR3 and TR4.

Assessment - Construction Method Plan

- 7.125 A draft-Construction Method Plan (CMP) accompanies the application, which provides a basic overview of the potential manor the scheme could be built out. The caveat to place on the CMP is that the full details and assessment would be prepared at the appointment of a construction team and prior to the commencement of development.
- 7.126 This section 73 application does not change the CMP position already approved.

Summary

- 7.127 The location of the Site and the proposed uses are compatible and together utilise and encourage the use of sustainable modes of transport and will have negligible impact on the local highway and transport network. The proposals therefore accord with the NPPF and RBLP Policies TR1, TR3 and TR4.

Cycle Parking

Policy

- 7.128 Paragraph 107 of the NPPF states that parking standards should take into account the accessibility of sites, type and mix of development and availability of public transport. **Policy TR5** of the RBLP requires car and cycle parking provision that is appropriate to the accessibility of locations to sustainable transport facilities, particularly public transport.
- 7.129 The Reading Parking Standards and Design SPD establishes car parking standards of relevance to the proposals that apply to Zone 1 (central Reading).

Assessment

- 7.130 The proposals are for a car-free development that reflects the highly accessible location of the Site, as described above. The changes proposed as part of this s.73 application do not change the outcomes of the cycle parking provision.

- 7.131 The car parking standards are a maximum and the zero-parking provision is reflective of the location and availability of public transport. The proposals are therefore considered to be appropriate and in accordance with the NPPF and Policy TR5 of the RBLP.
- 7.132 Secure parking spaces will be provided at a level of 1 space per 6 staff to comply with cycle parking standards for C1 use and retail use - with 20 staff, the requirement is for 4 spaces. These will be provided in a designated cycle store in the basement level. Additionally, there are multiple opportunities for cycle parking in the immediate vicinity, with Sheffield-style bike stands located on Broad Street, 100m south of the Site, and slightly further away on Friar Street and Belgrave Street.

Summary

- 7.133 The scheme has considered how deliveries, including waste collections and commercial deliveries are made to the site. The provision of cycle parking is in accordance with the parking standards and the development will be car free, therefore it is considered appropriate for the development and complies with RBLP policy TR5.

10. Flood Risk & SuDS

Policy

- 7.134 The NPPF requires development in areas at risk of flooding to be avoided (paragraph 155), utilising the sequential test and directing development towards areas of lowest flood risk (paragraph 162). Development should ensure flood risk is not increased elsewhere and should be supported by a Flood Risk Assessment (FRA) where appropriate. Paragraph 169 of the NPPF requires major developments to incorporate sustainable drainage systems unless it can be justified that these would be inappropriate.
- 7.135 **Policy EN18** directs development to areas at the lowest risk of flooding in the first instance. It also states that all major developments must incorporate Sustainable Drainage Systems (SuDS) as appropriate.
- 7.136 The Site is located within Flood Zone 1, as identified on the Government Flood Map for Planning. Flood Zone 1 is at low probability of flooding and defined as land having less than 1 in 1,000 annual probability of river or sea flooding.

Assessment

- 7.137 The Site location is at low risk of flooding and the most suitable location for development, in accordance with the sequential approach. The proposals do not meet the minimum requirements for a Flood Risk Assessment but such an assessment accompanies the application.
- 7.138 The changes proposed as part of this s.73 application do not change the outcomes of the flood risk assessment and SUDs provision.

- 7.139 To inform the FRA, a drainage strategy has been prepared for the proposed development following a review of relevant planning policy and guidance. To comply, the drainage hierarchy has been followed and SUDS have been considered from the outset of the design process.

Summary

- 7.140 The proposals are at low risk from flooding and comply with the sequential approach for such development. Policy EN18 provides flexibility in the incorporation of SuDS where this is appropriate for any particular site or development. The Site constraints prohibit the provision of a comprehensive SuDS and significant weight is to be given to the protection and conservation of the adjacent heritage assets and archaeological potential in relation to the Site. With no additional impermeable area added and a reduction in impermeable area through the inclusion of a brown/ blue roofs, the proposals will provide a lower surface runoff rate than currently exists. Therefore, the proposals comply with the NPPF and Policy EN18 of the RBLP.

11. Sustainability

Policy

- 7.141 Paragraph 154 a) of the NPPF requires new development to avoid increased vulnerability to the impacts of climate change and to help reduce greenhouse gas emissions. Development plans should identify opportunities for decentralised, renewable or low carbon energy supply systems (paragraph 155). Paragraph 157 a) builds on this and requires the determination of applications to consider the feasibility and viability of compliance with sustainability policies where the type of development and design may justify otherwise.
- 7.142 **Policy CC2** requires all major non-residential developments or conversions to meet the most up-to-date BREEAM 'Excellent' standards, where possible. Development should include recycling grey water and rainwater harvesting where systems are energy and cost efficient.
- 7.143 In considering adaptation to climate change, **Policy CC3** requires the following measures to be incorporated into development:
- Orientated to maximise opportunities for natural heating and ventilation;
 - Designed in resilience to climate change with measures such as solar shading, thermal mass, heating and ventilation, material colour choices, green and brown roofs and walls etc;
 - Trees and planting for shading of amenity areas and buildings, utilising native species;
 - Minimise the impact of surface water runoff and where possible, mitigation and resilience measures for any increase in river flooding levels as a result of climate change.
- 7.144 **Policy CC4** states that development of over 1,000 sqm should consider the inclusion of decentralised energy provision within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision. Developments will be expected to link to existing decentralised energy provision in the vicinity.

Assessment

- 7.145 This application is accompanied by an Energy and Sustainability Statement (ESS), which assesses the sustainability potential of the proposals and makes recommendations, as well as undertakes a BREEAM assessment of the proposals. The ESS recognises the constraints of the Site and the limitations that the conversion of Listed Buildings places on incorporating certain technologies, design elements and sustainability measures.
- 7.146 The changes proposed as part of this s.73 application do not change the outcomes of the energy and sustainability statement (for note BREEAM only relates to 145-146 Friar Street as per previous submission and agreed with the Council).
- 7.147 It is noted within the ESS that the apart-hotel in the new build/extension should aim to meet BREEAM Excellent in accordance with RBLP Policy CC2. The ESS, as per accepted guidance and in consultation with the Council, the two distinct elements of the proposal have been assessed separately i.e. the new build element and the listed building together with the interwoven extension. See the Energy and Sustainability Statement (ESS), for further technical details.

Summary

- 7.148 The proposals are considered to meet many of the best practice techniques and use of technologies to enhance the sustainability of the Site and the proposed development, within the feasibility of the Site constraints. The proposals will result in a much enhanced sustainability performance than the existing Site and will ensure an efficient reuse of the existing Listed Buildings. The proposals are therefore considered to comply with the provisions of the NPPF and RBLP Policies CC2, CC3 and CC4.

12. Servicing and Waste

Policy

- 7.149 **Policy CC5** requires development to minimise the generation of waste in construction and use of buildings. Proposals should be well designed to facilitate waste storage, reuse, recycling and composting. The Reading Sustainable Design and Construction SPD details measures that should be considered in the pursuit of minimising and managing waste.
- 7.150 The re-use and refurbishment of existing buildings where possible, rather than demolition, will contribute to minimising waste and a Site Waste Management Plan (contained in the DAS) should be prepared for developments. For during the lifetime use of buildings, the SPD states that adequate provision should be made for both internal and external storage of waste.
- 7.151 **Policy TR3** protects against detrimental impacts to highway safety and requires off-street servicing to be provided for non-residential development. The policy resists development that would give rise to regular movements of HGVs.

Assessment - Servicing

- 7.152 A Delivery and Servicing Plan (DSP) has been prepared, and changes proposed as part of this s.73 application do not change the outcomes of the DSP.

- 7.153 The Delivery and Servicing Plan assesses the current servicing and waste situation and provides a strategy for future servicing of the development proposals.
- 7.154 **Servicing Apart-hotel:** arrangements for the apart-hotel use will be predominantly driven by laundry servicing, which will be combined with other servicing requirements to limit trip generation.
- 7.155 **Waste Apart-hotel:** they will utilise a self-bin store to be created off the main public square, which will enable easy transportation of waste bins between the site and refuse vehicles. General waste and recyclables will be separated within each apart-hotel unit kitchen and collected with the cleaning of each unit.
- 7.156 **Servicing Retail:** the DSP notes the existing use of the site and floor area, the proposed use will be consistent in floor area, therefore, the servicing is expected to be similar to the existing situation.
- 7.157 **Waste Retail:** the DSP notes the existing use of the site and floor area, the proposed use will be consistent in floor area, therefore, the servicing is expected to be similar to the existing situation.
- 7.158 To ensure compliance with the DSP and of the servicing arrangements, a member of staff will be appointed responsibility for overseeing and implementing the management plan.

Summary

- 7.159 The DSP concludes that the servicing and waste arrangements will enable the efficient operation of the proposals and will minimise any impact of servicing movements on the existing road network. The Transport Assessment also concludes that the proposals will not give rise to detrimental impacts to the highway network or highway safety. For the reasons set out above, the proposals are considered to comply with the NPPF and Policies TR5 and CC3 of the RBL.

8.0 Summary & Conclusions

Summary

- 8.1 This s.73 Application and Listed Building Consent scheme together with supporting material show that the changes to the approved development proposals presented herewith represent sustainable development, are in accordance with the up-to-date development plan and should be granted planning permission and listed building consent accordingly.
- 8.2 The lack of desirability of the existing use, the demand for apart-hotel uses and the opportunity for preservation and enhancement of a heritage asset and the other benefits the scheme will deliver represent a strong justification for alternative uses with a summary of the key matters of consideration set out below.
- 8.3 The changes now proposed as part of this section 73 application build on the previously approved QVS1 schemes and evolve the original proposals, expanding on the QVS1 vision approved previously. This submission retains the courtyard, making it again available for public use, of the same size and nature of that approved as part of permission 221232. The retention of the square for public use, is welcomed by officers as per feedback.
- 8.4 The changes included as part of this application are made following a tendering process of the approved scheme as well as completed extensive marketing of the proposed retail and apart-hotel scheme - the Council have been provided with this information throughout the process. The tendering has established two key principles:
- The cost to complete the works is significantly greater than the initial cost estimates produced prior to submission of the application - this means the scheme as approved is unviable.
 - The second major concern is that the market interest in occupying the retail units as approved is not there, especially at a rate that could assist with viability.
- 8.5 This means the scheme, as approved is not viable to build and even if built, the market interest shows that the units presented would not be occupied. Therefore, the Applicant's lender unsurprisingly will not support nor fund such risk.
- 8.6 The Applicant has faith in the overall proposal and has worked extensively to establish what will be attractive to the market and also, how cost efficiencies can be made to establish a viable scheme. The Applicant has entered into extensive pre-application discussions with the Council, which has seen the scheme evolve - the Council have been clear in what they feel should be secured and the Applicant is keen to work with officers.
- 8.7 Therefore, the amended scheme that is presented by this amendment presents the key benefits of the approved scheme but in a more viable and market friendly scheme, although the

amendments make material changes to the scheme, they are not of sufficient change to warrant the submission of a new full planning application.

8.8 The changes made to the scheme are modest and comprise:

- Ground floor:
 - changes to the QVS Class E units - the quantum of floorspace will remain the same with a modest reduction in number of units to provide more units desired by the market (existing has four and reduced to three).
 - Friar Street Class E units will be increased in size to provide more floorspace.
 - there will also be changes to the apart hotel lobby and all public access will be from QVS.
- First floor:
 - improved efficient of this floor including changes to the stairs, lift core, increase in rooms (+) but reduction in built form to rear of No.146 and 11-15 QVS.
- Second floor:
 - improved efficient of this floor including changes to the stairs, lift core, increase in rooms (+) but reduction in built form to rear of No.146 and change to 11-15 QVS.
- Third floor:
 - improved efficient of this floor including changes to the stairs, lift core, increase in rooms (+) but reduction in built form to rear of No.146 and change to 11-15 QVS.
- Fourth floor:
 - improved efficient of this floor including changes to the stairs, lift core, increase in rooms (+) but reduction in built form to rear of No.146 and dormers to Nos.145-147.
- Roof plan:
 - Changes to take account of modest massing changes, but plant zone to remain same.
- Basement:
 - Modest change to No.146 basement to take account of improved lift and stair core.

8.9 The proposals represent a unique opportunity to save and restore these important heritage assets, breathing new life into the Listed Buildings and this part of the town centre. The significant heritage and public benefits of the proposals far outweigh the less than substantial harm arising to the heritage significance and result in a net benefit and enhancement to the current situation in full compliance with the tests and requirements of the NPPF and Policies EN1 and EN6 of the RBLP.

8.10 The retail provision of the proposals has changed slightly as part of this section 73 application and includes the provision of three separate retail units along Queen Victoria Street at No's 5-15, a reduction from the four as existing. Officer, on balance, deemed appropriate in overall terms, as advised following a meeting on 21st February 2024. This will enhance the vitality and viability on the Town centre, in accordance with the NPPF and policies CR1, CR7, CR8 and RL2 of the RBLP.

- 8.11 The apart-hotel use is a compatible and supporting use for this location within central Reading and will assist in enhancing the vitality and viability of the centre with a modest 3 room increase in accordance with the NPPF and RBLP Policies RL1, CR1, CR4 and CR6.
- 8.12 There are no changes to the plan proposed and therefore the NIA as a result, concludes that, with the incorporation of the recommended mitigation, the proposals will ensure noise levels to sensitive receptors will remain below the identified standard and requirements of policy and will not give rise to detrimental noise impacts.
- 8.13 The location of the Site and the proposed uses are compatible and together utilise and encourage the use of sustainable modes of transport and will have negligible impact on the local highway and transport network, which complies with the NPPF and RBLP Policies TR1, TR3 and TR4.
- 8.14 The proposals are at low risk from flooding and comply with the sequential approach for such development.
- 8.15 The proposals are considered to meet best practice techniques and use of technologies to enhance the sustainability of the Site and the proposed development, within the feasibility of the Site constraints. The proposals are therefore considered to comply with the provisions of the NPPF and RBLP Policies CC2, CC3 and CC4.
- 8.16 The Transport Statement submitted with the application also concludes that the proposals will not give rise to detrimental impacts to the highway network or highway safety.

Conclusions

- 8.17 Reading is poised for a bright future and to position itself as nationally recognised town of culture and sustainability, leading the way in green tech innovation. The redevelopment and growth of the town centre is a pivotal in achieving this ambition and is already underway with major schemes approved and under construction that will modernise and diversify Reading's offer in culture and leisure, education, research and development, retail, and employment sectors.
- 8.18 The QVS/Friar Street Site has an important role to play in the delivery of Reading's wider vision and represents a unique opportunity to retain and promote Reading's heritage as part of a diversified and modernised retail, culture and leisure offering in this key town centre gateway site. Through this proposed development, the Site will become a destination within the centre, attracting people from the wider region to its new and refurbished retail offering, sought after apart-hotel accommodation, revered public realm and community cultural events space, all set within sympathetically and lovingly restored Listed Buildings.
- 8.19 A place that supports the working population of Reading and local businesses and bolsters the leisure and tourism sector. A scheme committed to local employment, skills enhancement, job creation and driving footfall in this part of the town centre.

- 8.20 This application demonstrates compliance with national and local planning policy and guidance, as well as best practice techniques and approaches where possible, all the while continuing to strike that delicate balance. It has been demonstrated through this S.73 application that the changes to the previously approved applications ref: 221232/221233 accord with an up-to-date development plan, represent sustainable development and there are no material indications that indicate otherwise. This heritage led regeneration scheme of this key town centre site should therefore be granted planning permission and listed building consent accordingly.

