



Town Planning Bureau

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PLANNING, DESIGN AND ACCESS STATEMENT

Site: 200-202 Broad Street, Reading, RG1 7QJ
Application by: TE Broad St Ltd
Lead Consultant: Mr Paul S Bottomley
Date: 17th October 2025
Our Ref: URB-555-ST6

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1.0 Introduction

- 1.1 This planning, design and access statement is prepared by Mr Paul S Bottomley BA (Hons), MA, MRTPI of Town Planning Bureau and comprises supporting information in respect of a planning application for the development as described below.

- Applicant: TE Broad St Ltd (“the Applicant”).
- Site: 200-202 Broad Street, Reading, RG1 7QJ (“No.200-202” / “the Site”).
- LPA: Reading Borough Council (“the Council” / “RBC”).
- Change of use of upper floors to nine self-contained flats and associated works.

The Applicant

- 1.2 This application is submitted on behalf of TE Broad St Ltd, which is part of the Thackery Estate group, a property development and investment company with nearly 60 years’ experience and a nationwide portfolio. The Thackeray Estate has several key land holdings within Reading representing significant investment in the future growth of the Borough. This includes buildings on Friar Street and Queen Victoria Street (phase one and two of the QVS development). Approval was also secured for this Site for a two storey extension comprising six flats. This combination of properties represents a key part of the town centre.
- 1.3 The Applicant has a track record of delivering sensitive, iconic sustainable development across the United Kingdom, with particular experience in the successful reuse and regeneration of town/ city centre sites.

Proposal

- 1.4 Planning permission is sought for the change of use of the first to third floors of this existing TSB bank building to nine self-contained flats.
- 1.5 Externally, the West Street entrance will be amended and a modest alteration to the rear elevation to provide enlarged windows. at roof level, the existing plant room would be removed.
- 1.6 The most convenient way to assess the external changes is to directly compare the existing and proposed drawings.

Existing Elevation (Oxford Road)



Proposed Elevation (Oxford Road)



- 1.7 As one will note, the existing elevation is extended and the elevation is effectively added on to match the existing. The design is contemporary, however, takes account of the unique evolution and much altered diverse examples of the elevations within Broad Street.

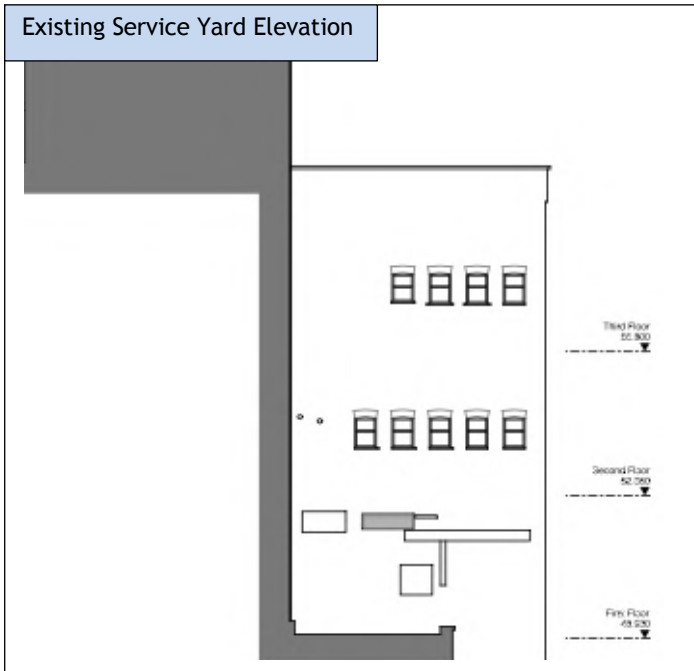
Existing Elevation (West Street)



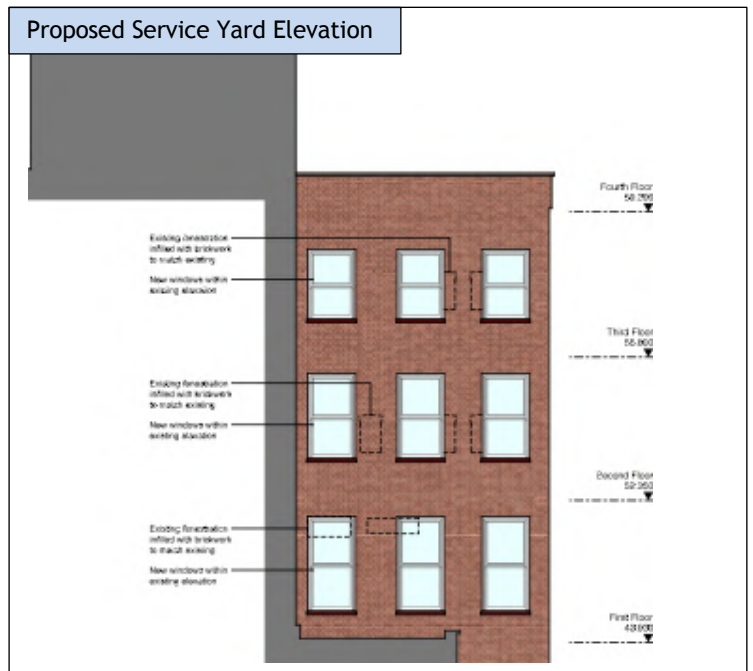
Proposed Elevation (West Street)



Existing Service Yard Elevation



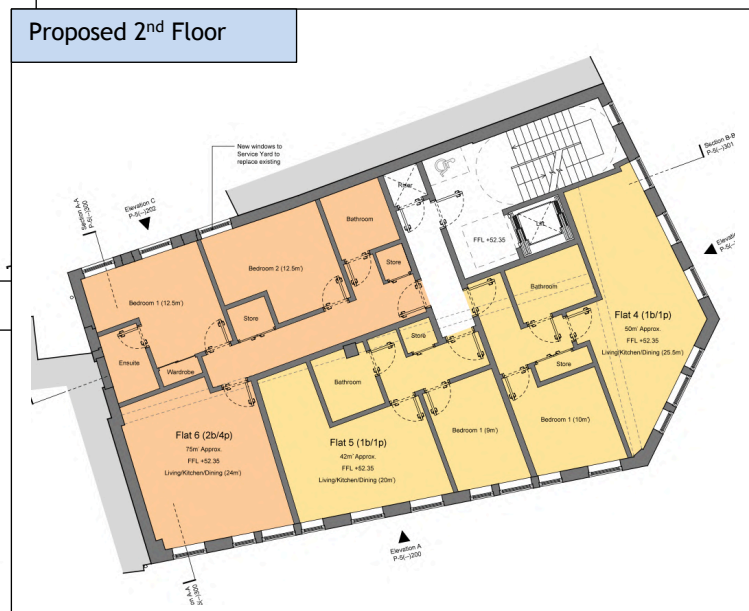
Proposed Service Yard Elevation



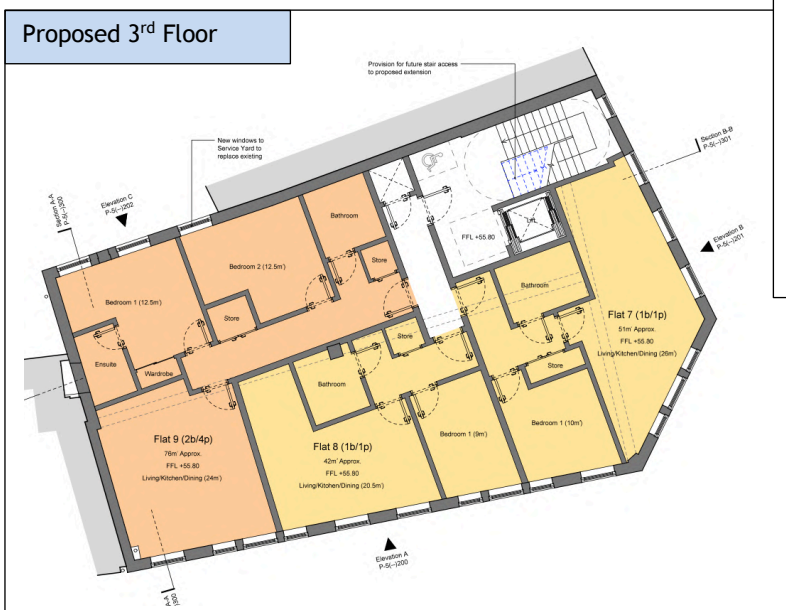
Proposed 1st Floor



Proposed 2nd Floor



Proposed 3rd Floor



2.0 Site Location & Description

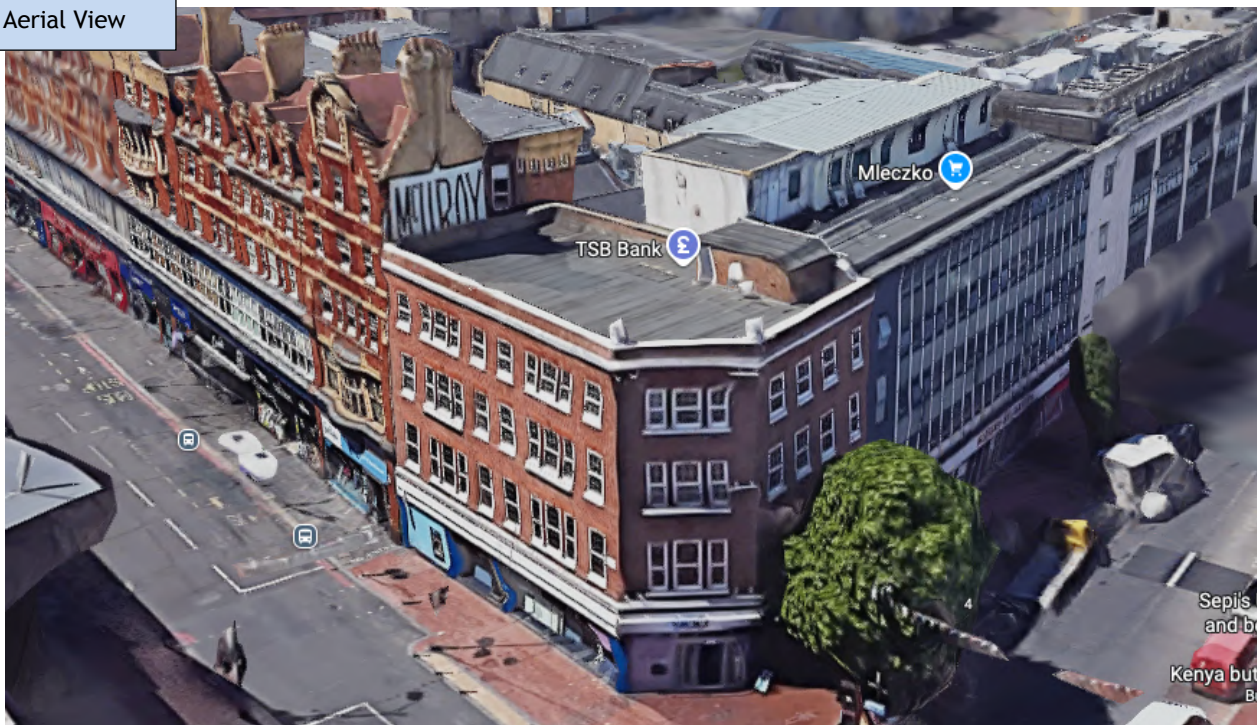
Site Location

- 2.1 The application site (“the site”) is located in the centre of Reading. The site comprises the existing five-storey (with basement) building at 200-202 Broad Street, also lesser known as 2-4 Oxford Road, being a prominent corner plot at the four-way junction of Oxford Road, Broad Street, West Street and St Mary’s Butts. This junction represents the gateway to the pedestrianised Broad Street and entrance to the main high-street shopping core of Central Reading.
- 2.2 The site is in a highly accessible location within the defined town centre, with immediate access to associated shops, services and facilities. Reading Railway Station lies approximately 400m to the north east and frequent local bus services run along Friar Street, approximately 110m to the north.

Location Plan



Aerial View



Current use

- 2.3 Basement floor: partially occupied by TSB Bank (Class E)
- 2.4 Ground floor: occupied by TSB Bank (Class E)
- 2.5 First floor: occupied by TSB Bank as back office and meeting rooms un-connected to branch operation (Class E).
- 2.6 Second floor: Vacant but lawful use is Class E.
- 2.7 Third floor: Vacant but lawful use is Class E.

Site Description

- 2.8 The existing building at the site is currently in mixed use, the ground floor and basement are Use Class E(c) (financial services) with the ground floor occupied by TSB bank. The basement comprises storage, office space, a staff room and toilets associated with TSB. The first floor is Class E office, again part of TSB's lease. The upper floors of the building are largely vacant and used for storage.

Corner View



- 2.9 The building is of red-brick construction with timber-framed white painted sash windows and white stone cornices above the ground floor shopfront and below the roof parapet. The corner façade is topped by two decorative stone vases. The building has a flat roof with additional plant housing and roof access.
- 2.10 Immediately adjacent to the Site at 26 West Street is a five-storey building in use as serviced apartments - the fifth storey is a later addition as part of a rear extension.
- 2.11 The immediately adjacent building is much taller with an additional storey, high pitched roof and tall chimney stacks. This building also has a rear projection a storey higher than the building at the site.
- 2.12 The building is not listed, nor are adjacent or surrounding buildings, and the site is not within a Conservation Area.

3.0 Relevant Planning History

The Site

3.1 There have been numerous applications for minor works at the site, such as shop front alterations and installation of ATM machines. More significant applications are limited and are summarised below.

- **230330** : Erection of a two storey roof extension to create six flats, with cycle store and bin store at basement level. Alterations to shopfront, reduction of parapet to front elevation and insertion of nine windows to rear elevation.
 - o Pending Approval.
 - o Drawing below.



- **220970** : Change of use of 1st, 2nd and 3rd floors from Class E (offices) to C3 (dwelling houses) to comprise 9 self-contained flats, comprising 6x1 bedroom flats and 3x studios. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.
 - o Approved/ Issued November 2002.
- **220534**: Infill of brickwork to match existing and new windows to the rear at first, second and third floors.
 - o Approved September 2022.
- **980922**: Change of use from A1 retail to A2 financial and professional services.
 - o Approved January 1999

4.0 Relevant Planning Policy

- 4.1 In preparing this application regard has been had to national and local planning policy, the relevant policies of the Development Plan are set out below:

National Planning Policy Framework (NPPF 2024)

- 4.2 The NPPF sets out the Government's planning policies for England and how these are expected to be applied. 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.
- 4.3 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.
- 4.4 The up-to-date development plan in this case is the RBLP, which has been prepared with consideration to the NPPF.

Reading Borough Council Local Plan (RBLP) November 2019

- 4.5 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
- CC5: Waste minimisation and storage
- CC6: Accessibility and the intensity of development
- CC7: Design and the public realm
- CC8: Safeguarding amenity

Natural and Historic Environment:

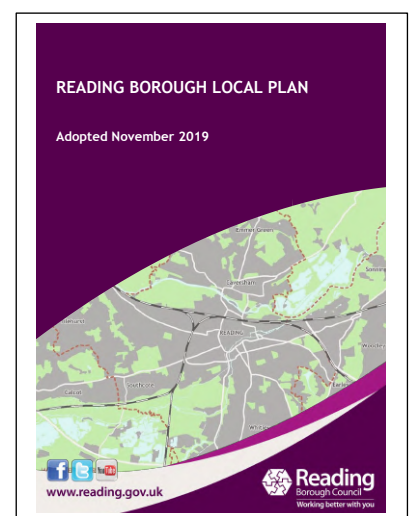
- EN5: Views

Central Reading:

- CR1: Definition of Central Reading
- CR2: Design in Central Reading
- CR6: Living in Central Reading

Other Policies:

- EM3: Loss of Employment Land
- H1: Provision Of Housing



- H2: Density And Mix
- H3: Affordable Housing
- H4: Build To Rent Schemes
- H5: Standards For New Housing
- H8: Residential Conversions
- TR5: Car And Cycle Parking And Electric Vehicle Charging

4.6 The site has the following planning policy designations as identified from the RBLP Proposals Map:

- Primary Shopping Area;
- Office Core;
- Central Core;
- Designated Primary Frontage in Central Reading (proposed);
- Area of Archaeological Potential;
- Tall Buildings Cluster (CR10b);
- Adjacent Classified Highway Network (Oxford Road and West Street);
- Adjacent Cycle Route (Oxford Road);
- Air Quality Management Area.

4.7 Additionally, the site sits within an identified significant view of heritage interest, northwards down Southampton Street from Whitley Street towards St Giles Church, St Mary's Church and Greyfriars Church.

4.8 The building is not listed, nor are neighbouring buildings. The existing building or neighbouring buildings also do not appear on the RBC 'List of Locally Important Buildings and Structures'. The site is not within a Conservation Area.

5.0 Access Considerations

Approaching horizontal building access

- 5.1 Pedestrian access to the site is directly from West Street.

Vertical Circulation/ Disabled Use of the Building

- 5.2 Access to the floors is proposed via internal lifts and staircases.

Car Parking

- 5.3 There is no change to the existing situation - no off street parking space is provided.

Cycle Parking

- 5.4 Cycle parking will be provided in the basement in a dedicated cycle store - this will provide six spaces for the nine flats. The scheme also provides three cycle spaces for the anticipated flats to be provided via the extension scheme (LPA ref: **230330**).

Waste Storage

- 5.5 Waste/ refuse storage will be provided in the basement in a dedicated refuse store providing six 360l bins, with space for a further three bins.

Servicing

- 5.6 Due to the sites central location car parking provision is not necessary, travel to and from the site is by public transport particularly the via bus and railway links.
- 5.7 During the works any waste generated will be stored within the building/site. This will be transferred to contractor vehicles which will park in the identified loading bay.
- 5.8 Contractor vehicles will only park temporarily within this bay and will use nearby on street and public cars parks at other times.

6.0 Planning Considerations

6.1 Planning permission is sought for the change of use of floors one to three. We consider the main planning issues for consideration are:-

- The acceptability of the change of use.
- Changes to the external appearance of the building.
- The impact on neighbouring amenity.

6.2 We address these issues in turn and demonstrate how the scheme as proposed complies with development plan policy and guidance.

Policy Considerations

6.3 The NPPF identifies at paragraph 126 that good design is a key aspect of sustainable development.

6.4 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.

6.5 **Policy CC1** Reiterates the presumption in favour of sustainable development 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.

6.6 The following key principles for the central Reading area are set out within the RBLP:

- The centre will contain a broad range of different but complementary uses within an area easily accessed by foot.
- The centre will appeal to all sectors of Reading's population as a place to live in, work in, study in and visit.
- New development will exhibit an excellent, safe and sustainable quality of design that contributes to the attraction of the centre.
- Areas and features that positively contribute to the unique and historic character of central Reading will be protected and, where appropriate, enhanced.

6.7 **Policy EM3** of the Local Plan sets out considerations in the case of a loss of employment land, the site is located outside the 'Core Employment Areas' and the policy sets out the circumstances where loss of an employment use can be acceptable. These include ii) when employment use no longer viable, iii) there is a surplus of similar sized accommodation and v) the alternative use is stronger than the need to retain the employment use.

- 6.8 **Policy H1** The Local Plan highlights the pressing need for additional housing in Reading with identifying a shortfall against need, not able to be met within the Borough.
- 6.9 **Policy H2** emphasises a focus on housing provision within the town centre, with and its supporting text recognising the role of town centre sites in delivery of higher density development and, accordingly, smaller unit sizes.
- 6.10 **Policy H8** relates specifically to conversions of buildings to residential use, seeking to protect the amenity of the surrounding area and for future occupiers.

The Acceptability Of The Loss Of Employment Use

- 6.11 The uppers of the building had operated in the past as office space in connection with the baking function of the ground floor - formerly banks such as this would have a range of services on-site, such as personal and business banking managers, mortgage advisors and administration to aid the function of the bank, including meeting rooms. However, employment on sites has steadily declined with many banks automating or centrally locating such services via telephone and online banking, the resultant upper floors are surplus to requirements providing little employment opportunities.
- 6.12 The Reading's AMR (12.2024) notes of all the employment land permitted in the central area, none has come forward and been built. The town has many purpose built, modern and underused / vacant office space that is available that is more appropriate than this site.
- 6.13 Having regard to **Policy EM3**, the underused office space is surplus to requirements and there is little demand for un-modernised office space in this part of Reading. The provision of nine new dwellings in this mixed use building, whilst retaining the ground floor commercial use, is a 'stronger' alternative use than the office space.
- 6.14 Therefore, Local Plan policy supports the principle of the loss of the employment use.
- 6.15 Turning to the proposed use, the proposals will yield nine additional residential units. This will assist in the delivery of much needed housing within the Borough and is in accordance with Local Plan Policies **H1** and **H2**. Further, planning permission will shortly be issued for six dwellings on site via an extension, the change of use of the upper three floors will compliment these proposed units and provide a combined total of fifteen new dwelling on site.
- 6.16 It should be noted the site did have Prior Approval for nine dwellings, however, due to access and leases in place, the nine flats were not commenced before the prior approval expired.
- 6.17 Reading's AMR (12.2024) does note the Borough has a good supply of units to be built, with significant approved in 2023-2024, however, the Council still needs to provide 689 dwellings per annum, and we note, nationally there has been a significant slowing down of housing

completions. This site will provide deliverable units (15 in total) by a developer who has a track record of delivering on the consents issued in Reading, both commercial and residential.

- 6.18 Summary: the change of use from employment use to residential complies with both national and local planning policy delivering 15 new dwellings in the town centre, therefore, the principle of residential development is supported by clear Local Plan policy.

Delivery of Housing

- 6.19 **Policy H2** supporting text recognising the role of town centre sites in delivery of higher density development and, accordingly, smaller unit sizes.
- 6.20 The proposals will deliver nine additional residential units and a mix of 1-bed and 2-bed sizes.

Future Occupiers

- 6.21 The Nationally Described Space Standards are reflected under **Policy H5** of the Local Plan.
- 6.22 The dwellings to be provided offer a range of sizes, but importantly all exceed the minimum flat sizes as set out in the Technical Housing Standards (March 2015). All flats also include storage.

Flat No.	Flat Type	Standard sqm	Size Proposed
1	1-bed/ 1-person	49	37 (+ 12 sqm standard)
2	1-bed/ 1-person	41	37 (+ 4 sqm standard)
3	2-bed/ 4-person	74	70 (+ 4 sqm standard)
4	1-bed/ 1-person	50	37 (+ 13 sqm standard)
5	1-bed/ 1-person	42	37 (+ 5 sqm standard)
6	2-bed/ 4-person	75	70 (+ 5 sqm standard)
7	1-bed/ 1-person	51	37 (+ 14 sqm standard)
8	1-bed/ 1-person	42	37 (+ 5 sqm standard)
9	2-bed/ 4-person	76	70 (+ 6 sqm standard)

- 6.23 Aspect: Flats 1, 3, 4, 6, 7 and 9 are dual aspect, with Flats 2, 5 and 8 being south facing. All dwellings have large windows and good outlook.
- 6.24 Amenity Space: the dwellings do not provide outdoor amenity space; however, all dwellings are over-sized that off-sets the lack of outdoor amenity space.
- 6.25 Noise: the dwellings will exceed Building Regulations requirements in terms of noise insulation - see the NIA.
- 6.26 Summary: The proposals will deliver nine additional residential units and a mix of 1-bed and 2-bed sizes that all exceed minimum space standards, have good outlook and all benefit from south facing windows.

Affordable Housing

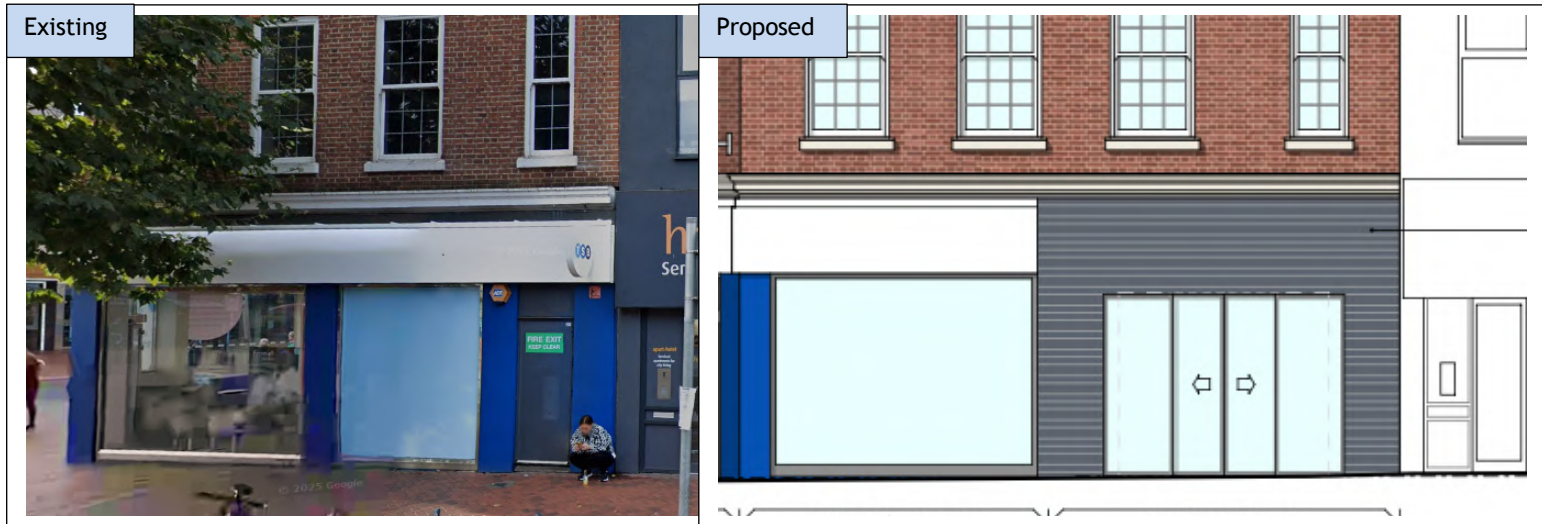
- 6.27 **Policy H3** of the Local Plan sets out the requirements for on-site provision and financial contribution towards affordable housing from residential developments of differing yields. Development proposals that fall short of the requirements must provide a viability assessment as justification for the reduced proposed contribution or provision.
- 6.28 At nine proposed dwellings, the policy requirement is for a financial contribution equivalent to 20% of units to be provided as affordable housing elsewhere in the borough.
- 6.29 This application is accompanied by a high-level viability appraisal, which considers the building as a whole, and related planning proposals/consents, as the site is within single ownership. This concludes that the combined proposals are unable to meet the full financial contribution specified in policy due to viability reasons. The approach taken is in accordance with the Affordable Housing SPD and contributions will be secured through a Section 106 mechanism. As such, the proposals will comply with the process and provisions of relevant planning policy.

Changes to the external appearance of the building.

- 6.30 **Policy CC7** reflects the national position in seeking high quality design and further reinforces the desire for high quality design and for proposals to maintain and enhance the character and appearance of the area in which they are located.
- 6.31 **Policy CR2** requires proposals to demonstrate the following attributes:
- Respect the existing grid layout, provide continuity and enclosure and frontages that engage with the street at lower levels. Enhance ease of movement through and around the central area.
 - High quality architectural details and materials should be used, respecting form and quality in local areas.
 - Should be designed with consideration to adjacent development sites, not preventing or causing unreasonable burdens on future development.

Entrance

- 6.32 The proposal is to improve the entrance to the flats, as existing the entrance is poor and does not offer an inviting entrance - see image over the page. Therefore, the Applicant is seeking to significantly upgrade the existing entrance.



- 6.33 As per **Policy CR2**, the upgrade to the entrance will be good quality architectural detail and materials, which respect the form and quality in local areas that are appropriate for the use, the site and general streetscape.

Rear Windows

- 6.34 To facilitate the use and provide improved aspect and daylight for the residents of the flats, the existing rear windows would be enlarged via planning permission ref: **220534** - see below.



- 6.35 The design and appearance is identical to what has been considered acceptable by the Council.

Heritage Impact

- 6.36 **Policy EN2** requires applications to identify and evaluate archaeological significance and any impacts of proposals, as the site falls within a designated Area of Archaeological Potential - one must consider archaeological impact. As the proposals are for change of use so will not change the basement slab, therefore further assessment is not required.
- 6.37 Summary: The overriding conclusion is that the modest changes to the building are appropriate in design terms, we therefore submit that the proposal fully complies with the requirements of Local Plan and the NPPF.

Amenities

- 6.38 Para.135 of the NPPF promotes development that will create a high standard of amenity for existing and future users.
- 6.39 **Policy CC8** of the Local Plan sets out multiple considerations for the potential impact of development on the living environment and amenity of both existing and future occupiers.
- 6.40 **Policy EN16** reiterates the requirement to ensure sensitive developments are not exposed to high-levels of pollution, including noise and air pollution.
- 6.41 **Policy H8** relates specifically to conversions of buildings to residential use, seeking to protect the amenity of the surrounding area and for future occupiers.

Future Occupiers

- 6.42 The property is a corner site, which has windows on all elevations, which ensures that there are copious areas of glass that provide a good outlook and will provide the occupiers with the benefit of more sunlight and daylight into their residential accommodation.
- 6.43 The flats will be sustainably heated and have good levels of noise attenuation.
- 6.44 The proposal is considered to comply with the NPPF and **Policy CC8** as the flats will provide future residents with a good level of amenity.

Neighbouring Occupiers

- 6.45 The proposals involve the internal alterations of the existing building with no major external alterations to the existing building. In the absence of such changes, the proposals will not have any impact with regard to daylight/sunlight, overbearing or loss of outlook of any neighbouring or surrounding occupiers.
- 6.46 Given the surrounding uses, the introduction of residential uses and habitable rooms will not create and overlooking impacts for existing neighbouring occupiers in the surrounding area.

Noise

- 6.47 A Noise Exposure Assessment is submitted with this application, which assesses the potential impact on future occupiers of the dwellings. The assessment has been carried out in accordance with relevant British Standards and concludes that acceptable internal noise levels can be achieved, utilising recommended mitigation through glazing specification.

Air Quality

- 6.48 **Policy EN15** of the Local Plan requires applications for sensitive uses, such as residential, introduced into an Air Quality Management Area to mitigate for any detrimental impacts. This application is accompanied by an Air Quality Assessment, which has assessed the baseline conditions and potential impacts on future occupiers of the proposals, particularly that of traffic emissions from Broad Street. This concludes that pollution levels are below relevant Air Quality Objectives and suitable for the proposed use. Owing to the car-free nature of the development, the air quality impacts arising from the proposals are identified as not significant. The proposals therefore comply with relevant planning policy in this regard.

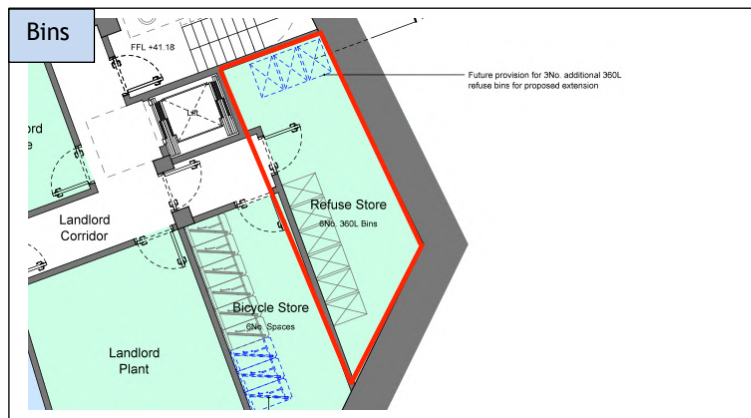
Sustainability

- 6.49 **Policy CC2** of the Local Plan requires new developments to be of sustainable design and construction and to take account of the effects of climate change. The policy specifically requires all minor conversions to residential use to meet BREEAM 'Very Good' standard as a minimum.
- 6.50 **Policy CC3** sets out further examples of how developments can incorporate measures to adapt to climate change, which will be sought.
- 6.51 Utilising an existing building for refurbishment to alternative uses limits the scope of climate change adaptation measures that can be incorporated. However, the design of the proposals has taken advantage of existing attributes of the building, such as the orientation of habitable rooms to utilise facades with southerly exposure for natural light and heating where possible, which coordinates with window proposals as part of other applications discussed above. The conversion of the premises will also incorporate modern insulation materials to assist in regulation of the internal climate and reduce the energy usage.
- 6.52 The proposals will comply with the BREEAM 'Very Good' Standards as a minimum in accordance with **Policy CC2** if required by the Council.

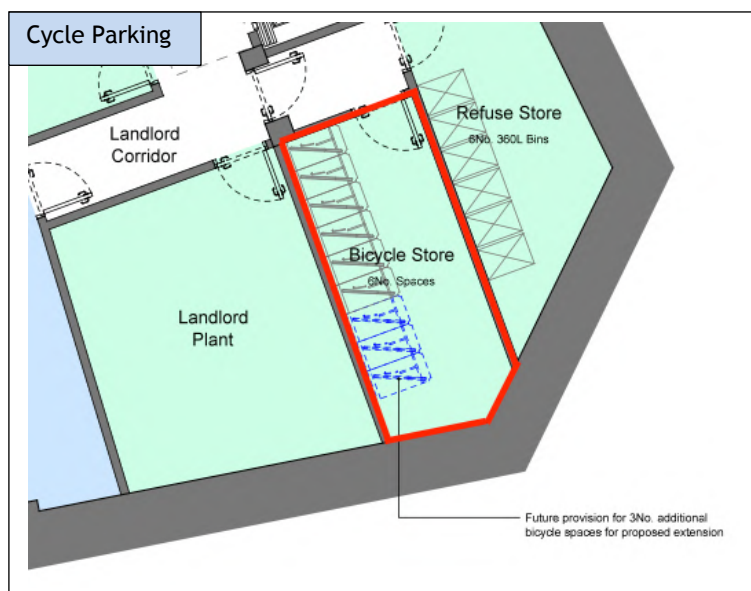
Transport and Parking

- 6.53 **Policy TR3** of the Local Plan requires development proposals to consider their effect on traffic safety, congestion and the environment.
- 6.54 The existing premises do not have off-street servicing capabilities. Appropriate internal refuse storage will be provided for within each flat. Domestic waste will then be removed by kerbside collection in line with existing arrangements in the vicinity. This is not considered to give rise

to highways safety issues - basement waste storage for the nine flats and subsequent six flats are shown below.



- 6.55 **Policy TR5** of the Local Plan requires development proposals to provide car and cycle parking that is appropriate to the accessibility to sustainable transport facilities. The Parking Standards and Design SPD establishes a parking requirements of 0.5 spaces per 1/2-bed flat within the identified Zone 1 for the Central Core Area, which the site is within. The SPD states that where parking provision is proposed below these standards, it needs to be demonstrated that there would be no detriment to highway safety.
- 6.56 The site is extremely sustainably located with easy walking access to Reading Railway Station and bus interchange as well as town centre uses such as shops, restaurants, cafes and other facilities. The application therefore proposes a car-free development to reflect the sustainable location. This approach is in line with the accepted position on car-free proposals in the PNCs, where it was acknowledged that, owing to the town centre location and local parking restrictions, a car-free development of this nature would not have a detrimental impact on highway safety. The proposals are therefore considered to comply with relevant planning policies.
- 6.57 Cycle parking will be provided comprising six spaces, with a further three spaces for the further six flats, if and when built.



7.0 Summary and Conclusions

- 7.1 Planning permission is sought for the change of use of the upper three floors of the existing TSB bank building with associated works.
- 7.2 The change of use from employment to residential fully accords with Local Plan policy.
- 7.3 The scheme will provide nine self-contained flats in a highly sustainable part of the town centre.
- 7.4 The elevation changes are modest and simply comprise a new entrance to West Street and enlarged windows to the rear elevation as per a former planning permission.
- 7.5 The dwellings provide a good standard of accommodation in terms of space, noise, outlook and natural daylight.
- 7.6 The scheme complies with the relevant Local Plan policies and guidance.
- 7.7 The application is accompanied by a viability appraisal to justify the approach to affordable housing contributions.
- 7.8 The proposals will comply with relevant planning policy, providing much needed residential development in a sustainable location, creating a suitable environment and amenity for neighboring and future occupiers.
- 7.9 The policy presumption is in favour of the grant of planning permission and there are no material considerations that outweigh that presumption as the development proposed would be of a high.
- 7.10 We therefore submit that the proposal fully complies with the requirements of Reading Borough Council and the NPPF and this proposal could be supported by officers.

