

DELEGATED APPLICATION REPORT

Ward: Abbey

App Refs: a) PL/25/0395 & b) PL/25/0410

Address: 13-15 Station Road, Reading, RG1 1LG

Proposals: a) Change of use from office (Class E) to 7 residential units (Class C3) at part-basement floor, part-ground floor and first to fourth floor levels, cycle storage facilities at rear ground floor level and replacement rooftop mechanical plant (amended description).

b) Various internal and external works associated with the change of use from office (Class E) to 7 residential units (Class C3) at part-basement floor, part-ground floor and first to fourth floor levels, including secondary glazing, internal layout alterations, cycle storage facilities at rear ground floor level and replacement rooftop mechanical plant (amended description).

Case Officer: Mr Jonathan Markwell

Applicant: Mr A Aleshaiker, Faye and Yarn Limited (as stated on the application form, various other documents reference the application being Faye and Yara Limited)

Agent: Originally Bell Cornwell, but following an email from the applicant on 17 October 2025, this was officially changed to Tor&co on 23 October 2025

Date received (valid from): 14 March 2025

Target Decision date: Originally 09 May 2025, but extensions of time were agreed with the agent (on 10 November 2025) until 21 November 2025

1. SITE DESCRIPTION

1.1 The application site relates to a Grade II listed basement, five storey and roofspace mid-terrace building along the west side of Station Road, between the junctions of Garrard Street (to the north) and Friar Street (to the south). The building is stated on the application form as being vacant. It was most recently occupied by Chiltern Training, who according to the application form vacated the building on 05/08/2024. It was established at the time of the 2023 application – see relevant history section below – that they had occupied the site since 1993, with this being their headquarters in providing a range of learning opportunities in Childcare and Business and Administration. Based on the officer site visit at the time of the 2023 application, it appeared that some of the space within the building had previously been used for educational purposes too, presumably on an ancillary basis to the main office function. Based on discussions during the officer site visit at the time of the 2023 application, the demand for such facilities has decreased since the COVID-19 pandemic, hence the reconfiguration of the space proposed as part of the 2023 application (similarly proposed in this application).

1.2 The building was first listed in 1978 and the Historic England listing is as follows:

STATION ROAD 1. 5128 (West Side) Nos 13 and 15 SU 7173 NE 1/581 SU 7173 12/581 II GV 2. Probably circa 1903 and by Joseph Morris. Similar exuberant mixture of Baroque Art Nouveau and Flemish styles as Nos 17-27 (odd) qv. Very elaborate. 3 storeys and attic. Red and yellow glazed brick with terracotta enrichment to front only. Tiled roofs. 2 bays, tripartite sash windows. Bracketed oriel on 2nd floor to left. Enriched crows step gables of differing heights. Modern shop front.

1.3 Neither neighbouring building is listed, but opposite the site 8-10 Station Road and 2-25 Harris Arcade are Grade II listed, as is Great Western House to the north-west (occupied as a Malmaison Hotel fronting onto Station Road).

1.4 The application site is also within the designated Reading Central Area, an air quality management area, tall building cluster, area of archaeological potential, primary shopping area, central core and office core.

1.5 The site is also within the Station/River Major Opportunity Area (MOA), with the MOA as a whole being a flagship scheme extending the centre and providing a mixed use destination

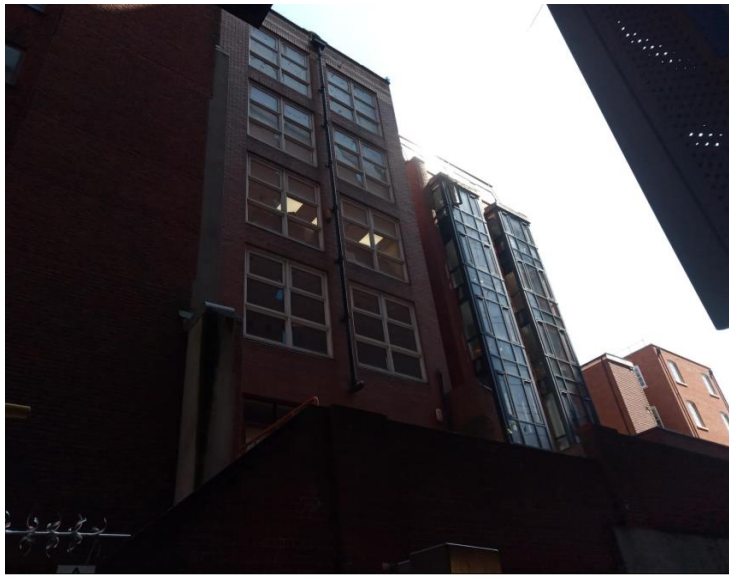
in itself. The site is within the CR11a Friar Street & Station Road sub-area (thereby making it an allocated site for development), which states:

There will be active retail and leisure uses on the ground floor along Friar Street and Station Road, with a mix of uses on higher floors. Development should enhance linkages in a north-south direction to link to the Station Hill area. Listed buildings and their settings in the area will be conserved, and opportunities to improve the environment of Merchants Place will be sought.

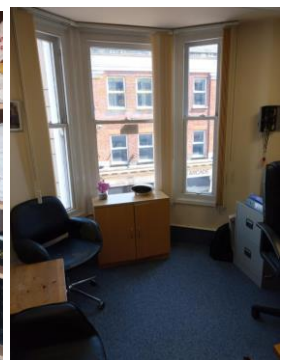
- 1.6 Station Road is a main pedestrian route between Reading Station and Broad Street within the town centre. It is also a designated cycle route, part of the proposed Mass Rapid Transit route and has restricted access for cars, with buses and taxis permitted (with bus stops and taxi ranks nearby). Garrard Street links the phase 1 / phase 2 completed mixed Station Hill redevelopment (predominantly residential at the Ebb and Flow buildings and the One Station Hill office building opened in 2024) and the 15 storey Thames Tower and Reading Station.
- 1.7 The service access road, to the west of the existing building, provides access/servicing capabilities to the existing building, Garrard House, Brunel House, Projection East and Icon House flats, the Novotel and Ibis Hotels and gated pedestrian access through to Merchants Place.

Site visit date (as part of the 2023 application): Interior and Exterior on 03/05/2023

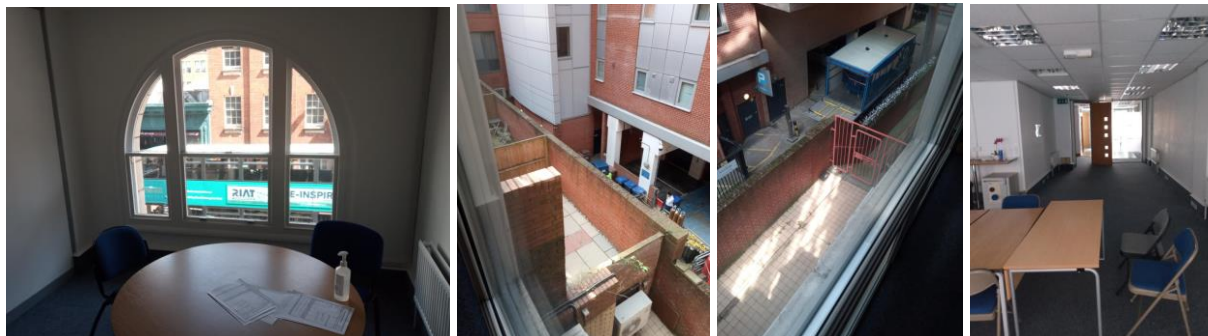
A selection of site visit photos:



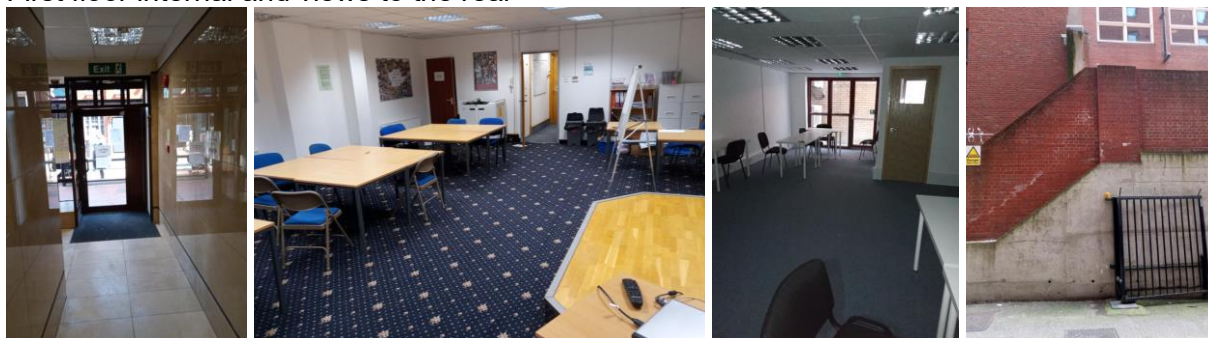
Front and rear elevations



Fourth, third and second floor internal photographs



First floor internal and views to the rear



Ground, basement and rear elevation

2. PROPOSAL AND SUPPORTING INFORMATION

- 2.1 Full planning permission is sought for various works associated with conversion of existing building to 7 residential units (Class C3), with 6 x 1-bed units (2 each at first, second and third floor level) and 1 x 2-bed unit (at fourth floor level). Bikes and bins will be provided at basement floor level, with a separate residential entrance (as existing) provided at ground floor level. The proposals also involve the retention of part of the existing Class E use at remaining basement and remaining ground floor level, with a bike store within the external area at rear ground floor level. Replacement plant at roof level is referenced as being proposed (HVAC replaced with MVHR) as part of the proposed works too, with the proposed plans indicating a cycle store in the rear external area at ground floor level is also proposed.
- 2.2 Given the building is Grade II listed, separate listed building consent is sought for the various internal and external works associated with conversion of existing building to residential units (Class C3). As well as the external works referenced in the previous paragraph, a series of internal alterations are proposed, including the remodelling of units which involves the re-positioning of various walls and the proposed introduction of secondary glazing to the inside of windows on the front elevation at first floor level and above.
- 2.3 During the course of the application a series of inconsistencies on the plans submitted at the outset of these applications have been corrected through the submission of revised plans by the applicant, following officer feedback. These exact same changes were incorporated prior to the validation of the 2023 applications. The BREEAM pre-assessment has also been submitted during the application, as this was submitted previously, but not at the outset of this application. The changes to the plans as part of these applications and the submission of an additional document were not considered to be of a nature to warrant formal public re-consultation on the applications.
- 2.4 Plans considered - List of planning drawings:

2209-PL-01 Location Plan & Block Plan
 2209-PL 02/a Existing Floorplans 01
 2209-PL 03/a Existing Floorplans 02

2209-PL 04/a Existing Floorplans 03
 2209-PL 05 Existing Roof Plan
 2209-PL 06/b Existing Elevation 01
 2209-PL 07-A Existing Elevation 02
 2209-PL 08-A Existing Sections
 2209-PL 09/b Proposed Floorplans 01
 2209-PL 10/b Proposed Floorplans 02
 2209-PL 11/b Proposed Floorplans 03
 2209-PL 12 Proposed Roof Plan
 2209-PL 13/b Proposed Elevation 01
 2209-PL 14-A Proposed Elevation 02
 2209-PL 15/b Proposed Sections
 As received 10/09/2025

(Officer note: It is verified that the above plans are the exact same plans considered as part of the 2023 applications at the site.)

2.5 Other documents:

- Application for Planning Permission; Listed Building Consent for alterations, extension or demolition of a listed building Ref PP-13790256, dated 13/03/2025
- Community Infrastructure Levy (CIL) - Form 1: CIL Additional Information Ref PP-13790256, dated 13/03/2025
- Planning and Heritage Statement Including Sustainable Drainage Information, Sustainability Statement and Waste storage and collection - 13-15 Station Road, Reading by Bell Cornwell LLP
- Design and Access Statement by iB Architects dated 10 January 2023 Ref 2209
- Noise Assessment by Hawkins Environmental dated 26th January 2023, Ref H3663 - NV – v2
- Air Quality Assessment by Hawkins Environmental dated 26th January 2023, Ref H3663 - AQ – v2
- Market Report on letting activity and commercial market commentary by Hicks Baker dated January 2023
- Letter by Bell Cornwell '13-15 Station Road, Reading' Ref 2557, dated 13/03/2025
- Transport Statement by Evoke Transport Ref R-22-0132-TS-01A dated 16 February 2023
- Financial Viability Appraisal by S106 Management dated 12/02/2025
- Schedules 1 – 5 associated with the Financial Viability Appraisal by S106 Management
As all received on 14/03/2025
- Email from Bell Cornwell 'FW: 13-15 Station Road, Reading - PL/25/0395 + PL/25/0410' dated 25th March 2025
- Email from Bell Cornwell 'FW: 13-15 Station Road, Reading - PL/25/0395 + PL/25/0410' dated 26th March 2025
- Budget Estimate of Costs for refurbishment, alteration and conversion of existing building to create 7nr apartments and 1nr retail unit at 13-15 Station Road, Reading, RG1 1LG FOR Faye and Yara Ltd by David R Parker dated February 2025 (.pdf and .doc versions received), as received 26/03/2025
- Email from Bell Cornwell 'RE: 13-15 Station Road, Reading - PL/25/0395 (update)' dated 6th August 2025
- Email from s106 Management 'Re: 13-15 Station Road, Reading - PL/25/0395 (update)', dated 08/08/2025
- Financial Viability Assessment '13-15 Station Road, Reading, RG1 1LG', by Colliers International UK, dated 27/06/2024, as received 08/08/2025
- Photos of the Building, 5 pages, as received 08/08/2025
- Report and Valuation for Faye and Yara Ltd by TM Hughes Property Consultant, dated 11/08/2023, as received 08/08/2025

- Email from Bell Cornwell 'RE: 13-15 Station Road, Reading (PL/25/0395 & PL/25/0410)' dated 02/09/2025
 - Email from Bell Cornwell 'RE: 13-15 Station Road, Reading (PL/25/0395 & PL/25/0410)' dated 04/09/2025
 - Email from Bell Cornwell 'RE: 13-15 Station Road, Reading (PL/25/0395 & PL/25/0410)' dated 09/09/2025
 - Email from Bell Cornwell 'RE: 13-15 Station Road, Reading (PL/25/0395 & PL/25/0410)' dated 10/09/2025
 - Email from Ahmed Aleshaiker 'Re: 13-15 Station Road, Reading', dated 17/10/2025 (Applicant seeking to confirm a change of agent)
 - Email from Bell Cornwell 'RE: 13-15 Station Road, Reading (PL/25/0395 & PL/25/0410)', dated 23/10/2025 (confirmation of no longer being instructed)
 - Email from Tor&co 'Re: 13-15 Station Road, Reading (PL/25/0395 & PL/25/0410)' (new agent handover)
 - BREEAM UK Domestic Refurbishment 2014 Pre-Assessment Estimator v0.1 '13- 15 Station Road Reading RG1 1LG', as received 29/10/2025.
 - Email from Tor&co 'Re: 13-15 Station Road, Reading (PL/25/0395 & PL/25/0410)' (new agent handover)
- 2.6 CIL - Based on the information specified by the applicant the existing floorspace amounts to 748.4sqm, with the proposed change of use to residential totalling 509sqm. Given the proposed development seeks to create residential unit it will be CIL liable development. It will be ascertained at a later date whether the scheme will be chargeable, or attract a nil contribution, in the context of planning permission being refused and the CIL form stating the building was last occupied for its lawful use on 05/08/2024. If any future appeal were allowed (or separate future permission granted), then the 6 months in the previous 3 years use test would be based on the date of that permission.

3. RELEVANT PLANNING HISTORY (since 1990)

3.1 Application site:

3.2 920501 - Extending gas flue for extraction of gases. Granted 18/04/1994.

3.3 PL/23/0202 - Change of use from office (Class E) to 7 residential units (Class C3) at part-basement floor, part-ground floor and first to fourth floor levels, cycle storage facilities at rear ground floor level and replacement rooftop mechanical plant. Granted following completion of S106 Legal Agreement on 16/12/2024.

Summary of obligations - the Developer's main covenants:

- o to pay to the Council the Affordable Housing Financial Contribution of £72,446 prior to first Occupation of any New Dwelling with a Deferred Affordable Housing Contribution Mechanism
- o Should the application site subsequently be extended/altered to create further residential units then contributions towards affordable housing would apply on a cumulative basis also taking into account this application.

3.4 PL/23/0203 - Various internal and external works associated with the change of use from office (Class E) to 7 residential units (Class C3) at part- basement floor, part-ground floor and first to fourth floor levels, including secondary glazing, internal layout alterations, cycle storage facilities at rear ground floor level and replacement rooftop mechanical plant. Granted Listed Building Consent 16/12/2024.

3.5 Neighbouring sites:

3.6 7-11 Station Road (directly to the south of the application site):

- 3.7 090857 - The addition of 1 floor to accommodate a residential (C3) 2-bedroom apartment, the conversion of 4 upper floors from commercial (A2) to contain 12 no. 1-bedroom residential units. The conversion of commercial space at street level to ancillary residential storage and utility accommodation and partly to extend the retained retail unit (amended description). Granted following completion of s106 legal agreement 28/04/2009.
- 3.8 131692/OPA - Change of use of ground (part), first, second, third and fourth floors from Class B1(a) (offices) to C3 (dwellinghouses) to comprise 18 x 1 bed flats. Prior Approval Granted 28/01/2014.
- 3.9 140189/FUL - Extension of building at 5th floor level comprising 3 additional flats (1 x 1 bedroom and 2 x 2 bedroom) together with provision of cycle and refuse storage. Granted following completion of s106 legal agreement 11/03/2015.
- 3.10 141529/OPA - Change of use of building from Class B1(a) (offices) to C3 (dwellinghouses) to comprise 18 x flats. Prior Approval Granted 14/11/2014.
- 3.11 17-27 Station Road (directly to the north of the application site):
- 3.12 None of relevance.

4. PUBLIC CONSULTATIONS

- 4.1 Planning Application: A site notice was prepared for erection at the site on 24 March 2025.
- 4.2 Listed Building Consent: A site notice was prepared for erection at the site on 24 March 2025. A press notice was published on 03 April 2025.
- 4.3 No letters of representation have been received.

5. INTERNAL CONSULTATIONS

5.1 Conservation Officer

- 5.1.1 Officer note: No comments have been received as part of this specific application, but those from applications PL/23/0202 and PL/23/203 (see history section above for details of these applications) continue to apply as the internal/external works are identical and the local physical context and policy regime has not altered significantly in the intervening time. Accordingly, the following constitute Conservation consultee comments on the application:
- 5.1.2 Nos. 13 and 15 Station Road, circled in Red are a pair of Grade II listed buildings. Station Street looking south is part of a street view leading to the significant Grade II Queen Victoria Street. The site is not in a Conservation Area. Diagonally opposite to the south-east indicated by the green circle on the map below is the entrance to a listed Harris Arcade (Blue Star – Listed buildings. Pink Star – Locally listed buildings).



- 5.1.3 The host building is a former commercial office building dating from c.1903. It has been partly unoccupied / underoccupied over the last few years. There has been one lease recently and they have reduced the area occupied and will finish their lease in 2024. The main area of significance is the front street facade and its original windows and windows joinery. The rear section of the building has no significance left and has been replaced by new modern offices.
- 5.1.4 The Listed Building Consent proposes to strip out a mainly modern building and its remaining office fit-outs.
- 5.1.5 The Heritage Statement clearly identifies the works proposed and apart from the detailing of the proposed secondary glazing on the street façade is supported as it will bring back new occupants to the building. The scheme is appropriate and supported as it will allow the host building to be refurbished for a new tenant.
- 5.1.6 Conclusion - Generally there are no objections to the proposal and Approval is recommended, subject to:
1. Any painting of timber framed windows and exterior doors to be painted with oil-based gloss paint (to match the front windows).
 2. Submission for approval of 1:20 details for the proposed secondary glazing:
Reason: The proposed works are considered to be an enhancement of the listed building and will enable the occupation of the building and give an on-going use.

5.2 Transport

- 5.2.1 The application is for the change of use of the first, second, third and fourth floors from office space to create 7 x 1 and 2 bedroom units, with the retention of the ground floor and lower-ground floor as commercial offices for the building's existing tenant.
- 5.2.2 The building is listed as Grade II and is located within the Reading Central Area and within Reading's primary shopping area. The site is located within Zone 1 of the adopted Parking Standards and Design SPD which is an area at the very heart of Reading Borough, consisting primarily of retail and commercial office developments, with limited residential. This area is well served by rail and bus links and also contains the largest proportion of public car parking spaces.
- 5.2.3 A car free development is being proposed. Given the sites town centre location and the extensive on-street parking restrictions in place a car free development can be considered in this instance. However, the appropriate conditions and informatives should be applied to ensure future occupants can not apply for permits in areas where the residential parking permit scheme operates.

- 5.2.4 Each of the new dwellings will have secure cycle storage provided either within the flat or in the lower ground floor communal spaces. For the offices, an external cycle storage will be provided in the existing courtyard at the rear of the building.
- 5.2.5 It is stated that refuse collection is from Station Road on a weekly on-street sack collection basis. Each dwelling has its own refuse storage and residents will be responsible for taking their refuse to the street on collection days. It is recommended that the Council's Waste department is consulted to ensure that bin storage collection arrangements are acceptable.
- 5.2.6 Given the site's central location a Construction Method Statement will be required and must demonstrate that appropriate measures will be implemented to ensure the safety of pedestrians and cyclists around the construction site.
- 5.2.7 There are no transport objections to this application subject to the conditions and informatics below:

C2 CONSTRUCTION METHOD STATEMENT (TO BE SUBMITTED)
 DC5 CYCLE PARKING (AS SPECIFIED)
 DC8 REFUSE AND RECYCLING (AS SPECIFIED)
 DC20 PARKING PERMITS 1
 DC21 PARKING PERMITS 2

IF3 Highways
 I13 Parking Permits

5.3 RBC Assets Management team

5.3.1 Original observations:

5.3.2 The RBC Assets Management team instructed JJV to undertake an assessment of the viability-based information submitted by the applicant, which seeks to justify a nil contribution towards affordable housing. JJV's subsequent report can be summarised as follows:

1. Non-Technical Summary

- 1.1 This report provides a review, on behalf of the Local Planning Authority ('LPA'), of the Financial Viability Appraisal ('FVA') dated February 2025 carried out by S106 Management ('S106M') on behalf of the Applicant, Faye and Yara Limited, in respect of planning application at 13 - 15 Station Road, Reading, RG1 1LG (local planning reference: PL/25/0395). Our assessment determines if the amount of affordable housing proposed by the Applicant represents the maximum provision viable.

Overview

Total amount of housing within scheme	Seven homes
Contribution for affordable housing proposed	Nil
Deficit found by Applicant	£-297,075
Surplus found by JJV	£34,954
JJV Conclusion	Offer is not the maximum viable amount

- Officer Note: JJV has explained that the payment in lieu is higher than the surplus because the surplus Residual Land Value figure of £212,132 incurs finance costs in the appraisal from day 1, whereas these are reduced when the surplus is converted to a Payment in Lieu payable at commencement of construction.

Conclusions of review

- 1.2 Following our review of the Applicant's FVA, we are of the view that the scheme delivers a financial surplus of £34,954 and can afford to accommodate a Payment in Lieu of on-site affordable housing of £37,331, payable on commencement of construction. We therefore conclude that the offer made by the Applicant is not the maximum viable amount of affordable housing.
- 1.3 The key inputs/assumptions adopted on behalf of the Applicant with which we disagree are:
- Residential Sales Values: The FVA understates the values achievable at the subject site.
 - Commercial Sales Values: The FVA overstates the value of the proposed commercial unit.
 - Construction Costs: The FVA marginally overstates these costs.
 - Residential Disposal Costs: The allowance adopted in the FVA is considered overstated.
 - Pre-construction Period: The FVA overstates the pre-construction period required.
 - Finance Rate: The finance rate adopted in the FVA is overstated.
 - Benchmark Land Value: The FVA substantially overstates this figure.

Advice to the LPA

- 1.4 To capture improvement in viability over the lifetime of the development and potentially provide a further contribution for affordable housing, we advise that the LPA seek to secure effective viability review mechanisms. We understand that it may be the case that the Applicant does not intend that the legal agreement will secure a late-stage viability review mechanism. Given that the local Affordable Housing SPD sets out that these should apply, there is no reasonable basis for this position and the legal agreement should secure a review mechanism in line with the aforementioned SPD.
- 5.3.3 JJV's full report goes into far greater detail than the summary above, explaining in full the various shortfalls of the viability submission. For the purposes of brevity, only the summary is provided above. The full report was fed into the applicant on 23 July 2025, alongside officer feedback, both from Planning Officer's and the RBC Assets Management team. In summary, this advised that the proposed nil contribution was not accepted. Instead, a S106 Legal Agreement securing a financial contribution of £37,331, together with a review clause mechanism, were necessary in respect of affordable housing, or the development would be refused on these grounds. Furthermore, wider matters referenced by Bell Cornwell in their original submissions were responded to as well (which are discussed in the appraisal section below).
- 5.3.4 RBC Asset Management's overview of the position at the time was that following the review of the applicant's Viability submission, a surplus of £37,331 is supported. This, compared with policy compliant contributions at 20% (£205,000) equates to just a 4% affordable housing contribution, which falls short of expectations, even for what are proven to be unviable schemes (owing to the significant need for affordable housing in the Borough). The £37,331 upfront contribution would need to be accompanied by an agreement for a late-stage review clause within the s106, with the following inputs:
- a BLV of 177,178
 - a profit of 15% on GDV
 - a finance rate of 7%
 - Max cap = £205,000 less £37,000 = £168,000
 - NB should any surplus be evidenced at the Viability review stage, which would be subject to indexation from the signing of the s106
- 5.3.5 The applicant's consultant (S106 Management Ltd) subsequently responded on 08 August 2025, attaching photos of the building, a red book valuation from August 2023 and the Colliers report undertaken on behalf of the Council in June 2023, as part of application PL/23/0202, and also advising:

I refer to your email of the 23rd July reference Viability.

Thank you for forwarding the JJV viability statement on behalf of the Council

The conclusion that there might be a contribution of £37,331 is entirely predicated by the conclusion that this 5506sq ft building has an AUV of £177,000, a capital value of £32 sq ft.

The building is in fact in good order - see attached photos. It is therefore quite unnecessary to spend £717,000 repairing it as JJV contend.

Further we have a 'Red Book' valuation (attached dated 11.8.23) which concludes that the building has an existing use value of £950,000.

Further your own valuers Colliers found a AUV valuation of £525,000 (p33) of their June 2023 report.

Clearly if the existing building is worth more than £205,000 - there is no room for a contribution.

Please can you refer this data back to JJV and ask them to 'stand back' and reflect on their position as the RICS suggest. We hope that on reflection they will agree that no AH contribution is required.

Equally we can see no merit in a LRM clause.

I look forward to hearing from you by say the 13th August with a response,

5.3.6 There was a change in Planning Officer on 01 September 2025, with a subsequent email from the agent at Bell Cornwell (on 04 September 2025) making it clear that a final decision was sought from the LPA. Officers confirmed on 04 September 2025 that RBC Assets Management and the Council's consultants JJV did not agree with the response from S106 Management Ltd dated 08 August. In light of Bell Cornwell's clear position evidencing no desire for any further discussions on the proposals, the Planning Officer advised that the planning application would be intended to be refused on lack of affordable housing grounds.

5.3.7 Further comments:

5.3.8 Prior to providing the final feedback to the agent, as referenced above, RBC Assets Management team instructed JJV to consider S106 Management Ltd's response on behalf of the applicant, as received on 08 August 2025. JJV's response was as follows:

11.2 We have reviewed the above email and comment as follows:

- S106M's Financial Viability Assessment adopted a BLV of £525,000. It assumed that the existing offices are refurbished, let and sold as an investment.
- S106M's email below states that the building is "in good order" and that it was not necessary for us to assume a refurbishment cost of £717,000.
- With respect to the refurbishment cost we have adopted, this is actually lower than the amount of £774,063 assumed in the valuation that underpins S106M's BLV. It is therefore challenging to apply much weight to S106M's position on refurbishment costs. If they have changed their mind on the BLV and the extent of refurbishment costs that underpin it, then they need to provide a properly evidenced valuation.
- S106M's email provides photographs of the existing building to show it is in good order. If S106M consider that the building is in good order and that a refurbishment of the building is unnecessary, then why have they adopted a BLV that assumes this? The photographs also do not provide any basis to reconsider the refurbishment costs. These costs (which need to be incurred in order to achieve the rental values assumed) are primarily to deliver new Mechanical and Electrical services, air conditioning and servicing.
- S106's email refers to the Colliers valuation which was undertaken on behalf of the LPA with respect to the extant scheme. They seem to expect that we take this valuation at face value. We do not agree with a number of the inputs adopted by Colliers. In particular, it is not clear why they have not allowed for matters including finance costs, letting agent and legal fees, disposal costs and rent free/void period allowance. As S106M have relied on Colliers' valuation in adopting their BLV, they

need to justify why it is reasonable that these matters are not included in the valuation that underpins the BLV they advised.

- S106M's email also refers to a 'Red Book' valuation of the existing site. It advises a value of £950,000. It describes an allowance for "refurbishment costs / legal costs / marketing costs and risk" which appears to equate to £150,000. No basis for the refurbishment (and associated costs) have been provided and no breakdown of the valuation is provided so it cannot be properly scrutinised. Only a limited amount of comparable evidence is provided. One of the comparables (Queen Victoria Street) provides residential accommodation so is of limited value in terms of its applicability to the subject, another (92 London Street) is let at a very low rent, so may be under-rented (which would explain the low yield) or if not has not been appropriately accounted for in the valuation in terms of the market rent to apply (the valuation assumes a rent of c£16psf for the subject whereas the passing rent of this comparable is £9 per sq. ft). The further comparable (65 – 67 Broad Street) is let to Bank of Scotland and achieved a yield of 10.17% - it is challenging to see how the valuer could refer to this comparable and then apply a lower yield of 8% at the subject property.
- For the matters raised above, we cannot place meaningful weight on the valuation provided.
- The email suggests that we 'stand back' and reflect on our position. The position we have adopted has been subject to a 'stand back' exercise.
- We asked that S106M carry out a 'stand back' exercise and in doing so consider how their position is reasonably consistent with the Applicant's position that, as expressed in the Hicks Baker Report and Planning Statement that accompany the application, the property "is no longer a viable commercial asset".
- The "T&Cs and Compliance" section of S106M's FVA states that S106M have, in line with the RICS' Financial Viability in Planning: Conduct and Reporting Professional Standard, acted "with reference to all appropriate available sources of information". They have not addressed the Hicks Baker report and the Applicant's contention that the property "is no longer a viable commercial asset" and need to do so in order to meet their professional requirements and so the matter of the BLV, and the viability of the scheme, can be resolved.
- Finally, S106M state that there is no merit in a late-stage review mechanism clause. No explanation is provided so we cannot comment on this. We are of the view that it would be of merit as it could capture actual values and costs incurred in the course of the development.

For information, the RICS definition of 'stand back' is: Following a detailed component review of the inputs into an FVA and running the appraisal, to stand back is to consider the output(s) objectively, and with the benefit of experience, given the complexity of the proposed scheme. This may often be assisted by reviewing the sensitivity analysis.

- 5.3.9 RBC Assessment Management confirmed that S106 Management Ltd's response did not alter JJL's viability conclusions, as no further evidence was submitted that was able to change JJL's view. The onus remained with the applicant to provide evidence of sufficient weight to inform the Viability assessor's review. Furthermore, it was advised that the contribution the Council considers appropriate was already the minimum acceptable. More specifically, £37,331 equated to 4% affordable housing contribution, which compared to the Policy Compliant level of 20%, so is extremely low already. To clarify, a 0% contribution with no deferred payment mechanism (DPM) within the s106 would not provide a suitable opportunity for the Affordable Housing Policies to be addressed and 'the weight given to the assessment is a matter for the decision maker, having regard to all the circumstances of the case' as per NPPF and PPG guidance.

5.4 Environmental Protection

5.4.1 Environmental Protection concerns

- Noise impact on development
- Noise within mixed use scheme

- Air Quality impact – increased exposure / new receptors
- 5.4.2 Noise impact on development - I have reviewed the noise assessment and am concerned that the proposal is to provide standard double glazing in a very noisy location in Reading town centre. I am concerned that the noise assessment may have underestimated the noise levels as the noise was not measured at a weekend when the night time economy is very busy and there is likely to be noise from patrons in the street. A dominant source of noise is identified as buses idling outside of the building, and I recommend that further more detailed assessment of the impact of the noise and vibration from an idling bus inside the building. It should be assessed as a noise event as opposed to an 8 hour average in this instance and should take into account the frequency of the noise, to ensure that the correct mitigation is selected. Further information is also required on the proposed ventilation.
- 5.4.3 *Planning Officer note: at the time of previous application PL/23/0202 the exact same noise assessment was submitted, at which time Environmental Protection advised that the noise assessment showed that the recommended standard for internal noise could be met, if the recommendations from the assessment were incorporated into the design. A condition was recommended and duly attached to permission PL/230202 to ensure that the glazing recommendations of the noise assessment will be followed. As such, there is acknowledged to be a differing standpoint reached on the same report, with there being no substantial change in local circumstances or policy in the intervening time. Set within this context, Planning Officers consider that it would not be sustainable to seek to resist the proposals on this basis, in the context of this specific matter being tested at appeal.*
- 5.4.4 Noise within mixed use scheme (e.g. commercial use on the ground floor and flats above) - I have concerns about noise from the proposed commercial use affecting the proposed residents. A condition is recommended which requires a detailed scheme for protecting the dwellings from noise emissions from the commercial use prior to the development commencing, or an assessment to be provided prior to consent being given.
- 5.4.5 Air Quality - Increased exposure - The assessment has identified that the levels of NO2 at the facade of the lowest two floors are likely to exceed the limit values therefore mitigation is required. Options are proposed in the assessment but the applicant will need to provide further detail on what proposed option is to be installed. This could be controlled by condition if appropriate.

6. Equality Act 2010:

- 6.1 In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. However, there is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application. Therefore in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

7. LEGAL AND PLANNING POLICY CONTEXT

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'. The following local and national planning policy and guidance is relevant to this application:
- 7.2 Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving a listed building or its setting or any features of special interest which it possesses.

7.3 Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority in the exercise of its functions to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.

7.4 **National Policy**

National Planning Policy Framework (December 2024, as amended)

2. Achieving sustainable development
4. Decision-making
5. Delivering a sufficient supply of homes
6. Building a strong, competitive economy
7. Ensuring the vitality of town centres
8. Promoting healthy and safe communities
9. Promoting sustainable transport
11. Making effective use of land
12. Achieving well-designed places
14. Meeting the challenge of climate change, flooding and coastal change
15. Conserving and enhancing the natural environment
16. Conserving and enhancing the historic environment

National Planning Practice Guidance 2014 onwards

7.5 **Reading Borough Local Plan (2019)**

- CC1 Presumption in Favour of Sustainable Development
- CC2 Sustainable Design and Construction
- CC3 Adaption to Climate Change
- CC5 Waste Minimisation and Storage
- CC6 Accessibility and the Intensity of Development
- CC7 Design and the Public Realm
- CC8 Safeguarding Amenity
- CC9 Securing Infrastructure
- EN1 Protection and enhancement of the historic environment
- EN6 New Development in a historic context
- EN9 Provision of Open Space
- EN12 Biodiversity and the Green Network
- EN15 Air quality
- EN16 Pollution and Water Resources
- EN17 Noise Generating Equipment
- H1 Provision of Housing* (* this policy is acknowledged to be out-of-date)
- H2 Density and Mix
- H3 Affordable Housing
- H10 Private and Communal Outdoor Space
- TR1 Achieving the Transport Strategy
- TR2 Major Transport Projects
- TR3 Access, Traffic and Highway-related matters
- TR4 Cycle Routes and Facilities
- TR5 Car and Cycle Parking and Electric Vehicle Charging
- CR1 Definition of Central Reading
- CR2 Design in Central Reading
- CR6 Living in Central Reading
- CR11 Station/River Major Opportunity Area

7.6 **SPG/SPD**

- Revised Parking Standards and Design SPD 2011
- Sustainable Design and Construction (2019)
- Affordable Housing SPD (2021)
- Planning Obligations under Section 106 SPD (2015)

7.7 **Other relevant documentation**

7.8 Local Plan Update

- 7.9 The current version of the Local Plan (adopted in November 2019) turned five years old on Tuesday 5th November 2024. The Local Plan was reviewed in March 2023 and around half of the policies in the plan are considered still up to date. However, the rest need to be considered for updating to reflect changing circumstances and national policy. A consultation version of the draft updated version of the Local Plan was published on 6th November 2024. Subsequent to this consultation a submission draft was sent to the Secretary of State on 9th May 2025. At the time of writing, the examination-in-public of the partial update to the local plan is in the process of taking place. Stage 1 hearings were held virtually on 11th and 12th November 2025. Stage 2 hearings will take place in due course.
- 7.10 Although there is a five-year period for carrying out a review of a plan after it is adopted, nothing in the NPPF or elsewhere says that policies automatically become “out of date” when they are five years old. It is a matter of planning judgement rather than legal fact whether a plan or policies within it are out-of-date. This will depend on whether they have been overtaken by things that have happened since the plan was adopted, either on the ground or through changes in national policy, for example.
- 7.11 Officer advice in respect of the Local Plan policies pertinent to this application is that they remain in accordance with national policy (aside from Policy H1, which is acknowledged to be out-of-date) and that the objectives of those policies remains very similar in the submission draft updated Local Plan. Therefore, they can continue to be afforded weight in the determination of this planning application and are not considered to be ‘out of date’ (aside from Policy H1).

8. APPRAISAL

- 8.1 The main considerations relevant to the determination of these applications are considered to be:
1. Land use matters
 2. Affordable Housing
 3. Design, including impact on heritage assets
 4. Quality of accommodation
 5. Amenity for nearby occupiers
 6. Trees, landscaping, ecology and biodiversity
 7. Transport
 8. Sustainability
 9. Planning Balance & Conclusions
- 8.1.1 Land use
- 8.1.2 *Reduction in floorspace of the Class E use*
- 8.1.3 In pure land use terms the proposal will result in the reduction in Class E floorspace at the site, from (based on information supplied by the applicant) 748.4sqm across all floors to 239.4sqm (the remaining Class E floorspace at part basement and part ground floor level). As such, it is proposed for there to be a reduction of 509sqm Class E floorspace at the site. The proposal does show the partial retention of Class E floorspace fronting onto Station Road at ground floor level, with the frontage split to comprise a retained Class E entrance

and floorspace and a proposed residential entrance. The changes to the Use Class Order were introduced (in September 2020) subsequent to adoption of the Local Plan (in November 2019), meaning there is some ambiguity between the town centre uses referenced within the Central Reading Policies and uses within Class E. For example, office uses are now within Class E, but their former use – Class B1 – is not listed as a use encouraged within primary frontages in Central Reading under Policy CR7. Looking at matters more broadly, paragraph 5.3.4 of the supporting text to Policy RC1 recognises that “mixing uses within the centre is at the heart of the strategy” and the designation of a primary shopping area does not mean that other types of development will not be acceptable in this area. With this in mind, it is considered that the partial loss of Class E floorspace is accepted in this case, with it significant that a proportion of the frontage at ground level would remain in Class E use, with the remainder being the residential entrance to the upper floors (as Policy CR7 references).

- 8.1.4 It is noted that the applicant’s supporting statement provides commentary in relation to the specific loss of office accommodation at the site, as although the buildings lawful use is Class E (following changes to the Use Class Order in 2020) the building is presently and has for a number of years been occupied as offices (formerly Class B1, now Class E). Whilst not strictly necessary (given the commentary in the previous paragraph) the applicant has considered Policy EM3 (Loss of Employment Land) and assessed the proposals against the six criteria where employment **land** (officer emphasis) would be lost. Officers would note that employment land is not necessarily being lost, as some floorspace is being retained which could be retained in the same use (or any of the wider Class E uses). Furthermore, a marketing report by Hicks Baker has been submitted to in order to assist in evidencing the non-viability of the use of the building for solely office uses (or more specifically the upper floors), on the basis of various marketing attempts to seek to attract occupiers between 2016 and 2022. This all points to support the proposed scheme, although as explained above, such evidence is not strictly required owing to the lawful Class E use and the partial retention of Class E uses at part ground and basement floors.
- 8.1.5 It is also relevant to note that previous permission PL/23/0202 considered this very same matter and judged the proposals to be acceptable in this regard. The local and national policy context has not changed so significantly in the intervening time to lead to a different conclusion in the assessment of these proposals.
- 8.1.6 *Introduction of residential at the site, density and mix*
- 8.1.7 The provision of seven residential units is welcomed in purely land use terms, assisting in contributing towards meeting the Council’s Housing targets, as per Policy H1 (albeit this policy is now out of date). This is readily acknowledged to be a planning benefit of the proposed development. It is noted that the Council is not currently meeting its annual housing targets for general housing as calculated using the standard method in Planning Practice Guidance (as required now policy H1 is out of date) or for the provision of Affordable Housing.
- 8.1.8 In terms of density, the application form specifies the site is 0.02ha in size, meaning that the 7 residential units created equate to a density of 350 residential units per hectare. Within the context of Policy H2 and the factors informing an appropriate density, the increasingly residential character of the town centre, the highly accessible location and this maximising the efficiency of the land all count in favour of this density being considered appropriate in this specific instance.
- 8.1.9 Related to this, in terms of the residential mix of units proposed, Policy CR6i) requires all proposals for residential development in the central area to contribute towards a mix of different sized units. As proposed, the mix would be 6x1 and 1x2-bedroom units. Accordingly, the proposal would provide a mix of unit sizes, albeit a somewhat limited mix. Given the listed nature of the building, the nature of the proposals (the conversion of an existing building) and the footprint of the existing building (making two units per floor at first

to third floor the natural configuration of units in this specific case), it is considered that the proposals adequately comply with Policy CR6i). The proposed mix would be required to be secured via planning condition.

8.2 Affordable Housing

8.2.1 Policy H3 (Affordable Housing) seeks to ensure that development proposals of 5-9 dwellings should provide a financial contribution the equivalent of 20% of the housing to be provided as affordable housing elsewhere in the Borough. This is in order to meet identified housing needs and to contribute towards sustainable, inclusive and mixed communities. There is a significant shortfall in provision of Affordable Housing compared with identified need.

8.2.2 The supporting text to the policy, at paragraph 4.4.19 provides some background to the policy and summarises the large amount of evidence that the Council has in respect of the critical need for Affordable Housing that exists within the Borough:

“The Berkshire (with South Bucks) Strategic Housing Market Assessment (SHMA, 2016) has once again emphasised the critical need for affordable housing within Reading as well as the remainder of Berkshire. The SHMA identified a need for 406 new affordable homes per year in Reading, which represents the majority of the overall housing required. The consequences of not providing much-needed affordable homes would be severe, and would include homelessness, households in temporary or unsuitable accommodation, overcrowding and younger people having to remain living with parents for increasing periods. Insufficient affordable housing will also act as an impediment to economic growth, as firms will face increasing problems with accommodation for their workforce. Meeting even a substantial proportion of the identified housing need presents significant challenges, and it is therefore critical that new residential development of all sizes makes whatever contribution it can.”

8.2.3 The supporting text continues at paragraph 4.4.23 to state:

“The target set in the policy has been determined as the result of an assessment of the viability of development of sites of various sizes in the Borough in accordance with the requirements of the NPPF. This will be the expected level of affordable housing provision.”

8.2.4 An up-to-date assessment of the need for Affordable Housing that exists in the Borough is within the supporting text to Policy H3 (para 4.4.21) of the Reading Borough Local Plan Partial Update Submission Draft, dated May 2025, which states the following:

“The Reading Housing Needs Assessment (HNA, 2024) has once again emphasised the critical need for affordable housing within Reading as well as the remainder of Berkshire. The HNA identified a need for 406 additional affordable homes per year in Reading, which represents the majority of the overall housing required. The consequences of not providing much-needed affordable homes would be severe, and would include homelessness, households in temporary or unsuitable accommodation, overcrowding and younger people having to remain living with parents for increasing periods. Insufficient affordable housing will also act as an impediment to economic growth, as firms will face increasing problems with accommodation for their workforce. Meeting even a substantial proportion of the identified housing need presents significant challenges, and it is therefore critical that new residential development of all sizes makes whatever contribution it can”.

8.2.5 Current Policy H3 includes provision for viability considerations, with the supporting text at paragraph 4.4.24 stating that

“...the Council will be sensitive to exceptional costs of bringing a site to market such as for reasons of expensive reclamation, or infrastructure costs, or high existing use values. Where applicants can demonstrate, to the satisfaction of the Council, exceptional difficulties in bringing a site to market, the Council will be prepared to consider detailed information on the viability of a particular scheme and, where justified through an open book approach, to reduce the affordable housing requirement...”

- 8.2.6 It is also relevant to note both the NPPF and the Council’s policies allow for viability considerations to reduce the provision but only in specific circumstances. Paragraph 59 of the NPPF 2024 states that

“The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force.”

- 8.2.7 Policy H3 places the onus on the developer/landowner to justify any lower affordable housing contribution. The supporting text to Policy H3 refines this, explaining that costs need to be “exceptional costs of bringing a site to market”. It is considered that the types of costs referred to in the Local Plan relate to problems with a site itself; expensive reclamation, infrastructure costs, or high existing use values etc. The cost of a particular design, or design choices, is not considered to fall within this type of exceptional cost; unless the design options are so limited as to prejudice the site coming forward for development in general. It is also not necessarily the role of the LPA to insulate a developer against financial risk associated with downturns in the market or rising development costs.

- 8.2.8 With this context in mind, the applicant’s position, in summary, is that the scheme cannot viably provide any contribution towards affordable housing, despite local policy requiring it (which differs from the national policy position for 7 unit schemes such as this). The applicant also raises several other factors, including changes in context since permission PL/23/0202 was granted at the site on 16/12/2024, which the applicant considers also means that no affordable housing contribution should be made in this instance. The applicant’s position is summarised within the supporting letter submitted at the outset of the application, with the relevant extract provided in full below:

In regard to affordable housing, Reading Borough Local Plan (which was adopted in November 2019 and is therefore now over five years old, requires, through policy H3, that development of between 5 and 9 dwellings provides an offsite financial contribution to affordable housing that is the equivalent of 20% of the units. The policy acknowledges that where proposals fall short of the policy target due to viability considerations, then an “open-book” approach will be taken to justify the lower provision. This application is accompanied by a viability report that confirms that the scheme is not viable with any contribution to affordable housing as it will only return a profit of 2.30% rather than the 15% target. Therefore, the provision of no contribution is consistent with planning policy in this regard as it is not viable.

Whilst there is clear support for the proposals, and a recognised need to ensure the Listed Building has an appropriate use to ensure its longevity, it is worth noting that the planning position has changed, with increasing pressure to deliver new homes to meet local needs.

In December 2024 the Government published a revised NPPF and updated PPG which are material considerations, and set out its approach to delivering growth in the July 2024 Written Ministerial Statement, in which the Government confirmed we are in “*the most acute housing crisis in living memory*” and their intention is to ‘get Britain building again’ with the launch of the new NPPF.

The Written Ministerial Statement of 30 July 2024 sets that context nationally, acknowledging the that “*sustained economic growth is the only route to improving the prosperity of our country and the living standards of working people*” and in order to deliver that “*decisive reform*” is needed “*urgently*” in regard to housing delivery, but also in terms of ensuring the infrastructure is there to support growth, which includes supporting commercial development to drive the UK’s economy.

Included in the update to the Planning Practice Guidance, published alongside the NPPF, was a revised standard method for calculating housing need. This increased the housing requirement in Reading Borough from 878 dwellings per annum to 1028 dwellings per year. An increase of 150 homes per annum. The result of which is to place greater emphasis on the need to deliver more homes in the Borough and therefore the delivery of the 7 apartments can be attributed significant weight in the planning balance.

The presumption in favour of sustainable development has been updated in regard to the tilted balance, as before confirming that development proposals that accord with up-to-date development plans should be approved without delay. In this case the proposed development accords with the development plan, albeit the development plan is now out of date.

However, and in any event, the plan is out of date as it is over five years old, and therefore, part d) would be triggered (the tilted balance) which confirms that the adverse impacts of a development have to significantly and demonstrably outweigh the benefits when assessed against the policies of the framework taken as a whole, and that in making this balance particular regard should be had to key policies for directing development to sustainable locations, which as a town centre site, is really the most sustainable location for development, that will make the most effective and efficient use of the building and is well-designed.

The Framework / NPPF confirms that affordable housing should not be sought for residential developments that are not major development (major development being over 5 dwellings) and therefore there is no requirement for the scheme to contribute towards affordable housing.

In terms of the tilted balance the scheme offers the following benefits:

- The delivery of much needed housing in a sustainable location;
- The protection of the Listed Building in the long term through its viable use;
- Provision of updated office space in a sustainable town centre location; and
- Bringing back at an active frontage to this part of Station Road.

As addressed, above there is an extant planning permission and listed building consent for the development that confirms that all the site-specific considerations are acceptable and that the development is consistent with planning policy.

The only issue for consideration with this application is the provision of an affordable housing contribution. A viability report has been provided that demonstrates that the scheme is not viable with that provision. The scheme needs to be viable to deliver the benefits proposed, without this the building will inevitably be left empty, and as a result, over time, it will fall into a worse state of disrepair putting the Listed façade at risk. It is important the scheme is brought forward viably to enable the longevity of the building, ensure the delivery of an active frontage in this town centre site and enable the delivery of 7 apartments in a sustainable location, alongside the office accommodation.

In accordance with National Planning Policy Guidance, this scheme should be approved without delay.

8.2.9 Considering first the wider factors the applicant raises (specifics on the viability submission and related obligations are discussed in detail thereafter), these can be summarised as follows, with officer responses to each detailed below too:

- Changes to the NPPF and increased need for housing in Reading Borough

8.2.10 It is noted that the Council is not currently meeting its annual housing targets for general housing as calculated using the standard method in Planning Practice Guidance (as required now policy H1 is out of date) or for the provision of Affordable Housing. If there is a need to increase housing supply, it does not follow that there should be a reduction in affordable housing supply which is an intrinsic part of meeting the identified need.

- The Local Plan is out-of-date

8.2.11 Aside from Policy H1, as separately referenced above, this is not accepted. With specific regard to Affordable Housing, recent appeal decisions have found Policy H3 not to be out of date – based on the evidence available. In addition, it is considered that the existing Local Plan (2019), the emerging Local Plan (Submission Draft 2025) and the NPPF are all aligned in their overall objective of creating mixed and balanced communities including the delivery of an appropriate mix of housing types for the local community - which includes affordable housing (NPPF paragraph 63). When considering the relative weight to be given to the various benefits and harms identified, it should be in the context of this need for housing which meets identified needs. It would be acting against these objectives to seek to justify a reduced amount of affordable housing due to a policy deemed “out of date” because of increased housing requirements. If there is a need to increase housing supply, it does not follow that there should be a reduction in affordable housing supply which is an intrinsic part of meeting the identified need.

- 8.2.12 There is therefore a demonstrated critical need for Affordable Housing in Reading. It is considered that the Council is justified in seeking to secure the provision of Affordable Housing for this development, subject to all relevant material considerations. Furthermore, a significant proportion of housing is provided via relatively small sites within Reading due to its largely previously developed, urban, nature. There is therefore a need for smaller sites of fewer than 10 units to deliver affordable housing, albeit in the form of financial contributions to be used elsewhere in the Borough (rather than on site Affordable Housing) to avoid an overall shortfall against housing targets.
- 8.2.13 Failure to provide adequate affordable housing would fail to make the most appropriate use of the land resource. This situation both in isolation, and if replicated within other developments, would reduce the accessibility to appropriate housing within Reading. It is not considered reasonable to expect other developments to compensate for the shortfall in provision.
- 8.2.14 Significant harm has been identified, as explained elsewhere in this appraisal, in terms of the failure to meet policy requirements for this site in terms of a critical need for Affordable Housing and the associated aims of achieving mixed and balanced communities is contrary to Policy H3. This harm will need to be weighed against other material considerations, including the wider benefits of the scheme if the proposals are to be considered acceptable. This is addressed within the overall planning balance at the end of this report.
- NPPF confirms affordable housing should not be sought for residential developments that are not major developments
- 8.2.15 The specific circumstances of developments within Reading Borough justify affordable housing contributions being sought and required on schemes that are not major developments, with this standpoint having consistently been applied by the Council and endorsed in appeal scenarios too. Accordingly, the exceptional circumstances of the Borough outweigh the general national position, with this also partly explained in the paragraphs above too.
- 8.2.16 Matters relating to the tilted balance of the application as a whole are referenced at the end of this appraisal.
- 8.2.17 Turning to specifically consider the viability position of the proposals, it is considered relevant to reference, as means of initial context, that as recently as 16 December 2024, a separate planning permission (as per PL/23/0202) was granted at the site for an effectively identical proposal, at which time the same applicant agreed and signed a legal agreement for:
- A financial contribution towards affordable housing elsewhere in the Borough of £72,446
 - A Deferred Affordable Housing Contribution Mechanism
 - Should the application site subsequently be extended/alterd to create further residential units then contributions towards affordable housing would apply on a cumulative basis also taking into account this application.
- 8.2.18 Furthermore, at the outset of application PL/23/0202, a financial contribution of £164,500 contribution appeared to have been offered, which officers considered to have been underestimated (it was considered that a financial contribution of £196,300 was required to be secured). The applicant then altered its position, submitting viability seeking to justify a nil contribution, with the negotiated position referenced in the bullet points above then being agreed between the parties at the time.
- 8.2.19 The applicant has however explained, as part of this application, that the viability position has altered since the previous permission, with the supporting letter specifying:

Viability

Following the approval of planning permission, it became clear that the financial contribution requested by Reading Borough Council would not be viable given the build costs associated with the scheme and development value and as described in detail in the viability report

The viability of this scheme was considered in on behalf of the Council by Colliers in June 2023. At that time the construction costs were considered to be £1.024m based on BCIS costs. The applicant has since received planning permission obtained a detailed cost plan which results in a projected construction cost of £1.462m (+ £420,000), whilst revenues have remained flat. This change in costs makes the payment of the previously agreed contributions (£72,446) non-viable and necessitates this application.

The viability report submitted adopts all the inputs previously agreed by Colliers – and as such it is only the new cost plan that requires review by the Council. This factor is expected to be reflected in the Councils review fee.

The present permission is linked to a S106 agreement containing a viability review clause. That obligation has been over ruled by recent planning appeal decisions, and will not be re offered in the context of the present application.

- 8.2.20 In terms of the viability submissions assessed as part of this application, as per section 5.3 above, it is evident that there is a significant difference in opinion between the applicant and the Council. The applicant's position is that a nil contribution is justified, while officers (with input from JJL on behalf of officers) disagree and specify that a financial contribution of £37,331 and a deferred contribution mechanism is required. The upfront contribution is below the policy compliant financial contribution required in this case, which is calculated to be £205,000. More specifically, at the upfront application stage, officers consider that 4% (£37,331), rather the full 20% (£205,000) is justified in this case. Accordingly, a review clause mechanism is also required, as summarised at section 5.3 above and separately below too. However, in overall terms from the Council's perspective, the proposal (nil rather than an initial £37,331) fails to make an appropriate contribution towards the provision of Affordable Housing, and therefore fails to make an appropriate contribution to the housing needs of Reading Borough. This is a significant shortcoming of the proposed development.
- 8.2.21 In addition, officers are also mindful that whilst the Council's own review of the viability position (undertaken by JJL in conjunction with RBC Assets Management team) accepts that the scheme cannot presently provide a fully-policy compliant affordable housing contribution. However, sensitivity testing of the viability position evidences that small changes in any of the many inputs (which form part of any viability assessment) over time could lead to the scheme being able to further contribute towards affordable housing in time. To ensure that any increased future profits can be secured for affordable housing, noting the 3 year period which is possible for implementation (in which time market conditions may change significantly), it is accordingly in this instance a necessary and reasonable requirement for a deferred affordable housing contribution mechanism to be secured via s106 legal agreement. The Affordable Housing SPD explains deferred contributions mechanisms in more detail (paragraphs 6.12 – 6.14), with paragraph 6.12 explaining:

"The viability of a development can change significantly over time, as market conditions change. The viability situation when a development is implemented can be very different to when the assessment at planning application stage was carried out, and this can particularly arise where a development is large or will be delivered in phases. The Council's policy is that an appropriate contribution to affordable housing will be made. It is therefore considered that, where a reduced contribution to affordable housing was agreed at application stage, a mechanism should be included within the Section 106 agreement that ensures that a proportion of increased profits are secured for affordable housing. This is referred to as a planning deferred contributions mechanism."

- 8.2.22 With this context in mind, the proposed development is therefore an appropriate scheme whereby a deferred contributions mechanism is required to be secured in any s106 legal agreement. It is pertinent to note that permission PL/23/0202 at the site, included a deferred contribution mechanism within the legal agreement
- 8.2.23 It is noted that the applicant no longer accepts the above. The supporting statement references that the *“obligation has been over ruled by recent planning appeal decisions”*, without expanding any further. The email from S106 Management Ltd on 8 August 2025 states It is assumed that the applicant is referring to Appeal Ref: APP/E0345/W/22/3310834, dated 8 November 2023. However, the applicant also raised this at the time of application PL/23/0202 at the site, but was subsequently agreeable to this obligation. The obligation has been applied consistently on cases in the Borough subsequent to the above appeal decision, with officers also mindful that the very same Planning Inspector was later agreeable to the obligation in Appeal Decision APP/E0345/W/23/3315618, dated 2 April 2024. Hence, the obligation evidently has not been “over ruled” as the applicant specifies, with it instead later being accepted in an appeal scenario, as well on a case-by-case basis by officers. In this specific instance, the inclusion of this obligation is evidently necessary, as per the commentary in the previous paragraphs, and the lack of such an obligation represents a harmful impact of the development.
- 8.2.24 A further affordable housing related clause is considered to be necessary to be secured via S106 Legal Agreement in this case too. This involves the scenario that should the application site subsequently be extended/alterd to create further residential units (e.g. through the conversion of a 2-bed unit into 2 x 1-bed units, the remaining office floorspace at basement and ground floor being sought to be converted into residential units or the building possibly being extended to create further residential units) then contributions towards affordable housing would apply on a cumulative basis, rather than a standalone basis. This stems from Policy H3 requiring different levels of affordable housing depending on the number of units, with the current proposal incorporating 7 residential units, which attracts a 20% affordable housing contribution, whereas a 10 unit scheme would have required a higher 30% contribution and a 1-4 unit scheme would attract a lower 10% contribution. The proposed approach therefore prevents this proposal being the first of a possible succession of applications, with the later applications having lesser requirements, or put another way, if all applications had been submitted collectively it would have generated a larger requirement. It is considered reasonable and necessary for this to be secured in this case so the site makes an appropriate contribution towards affordable housing to meet the needs of Reading Borough. This clause has been incorporated within a number of other permissions in the Borough in recent years, including being accepted at planning appeals. In particular, this obligation was secured in the extant permission at the site under permission PL/23/0202. The applicant has made no specific comment on this obligation as part of this application.
- 8.2.25 The absence of a completed legal agreement to secure the provision of Affordable Housing, together with associated obligations regarding a deferred contribution mechanism and Affordable Housing to be applied on a cumulative basis should the building subsequently be extended / altered (to create further units) or units sub-divided, is a significant shortfall in the proposal. This weighs against the proposals in the planning balance, contrary to Policies H3 and CC9, together with the adopted Affordable Housing and Planning Obligations under Section 106 SPDs.
- 8.2.26 For completeness, it is confirmed that these affordable housing based obligations would comply with the National Planning Policy Framework and Community Infrastructure Levy (CIL) in that they would be: i) necessary to make the development acceptable in planning terms, ii) directly related to the development and iii) fairly and reasonably related in scale and kind to the development.

8.3 **Design, including impact on heritage assets**

8.3.1 Based on the officer site visit at the time of applications PL/23/0202 & PL/23/0203, together with supporting documentation submitted with the application, it is evident that the only historic/architectural components of value (resulting in the listing of the building) at the site relate to the front façade of the building. Internally, no historical elements remain, with the building including relatively modern construction and fixtures and fittings throughout. The proposals seek to maintain the front façade of the building, with no external works proposed. The only element of the proposal which could impact on the significance of the designated asset involves the proposal to include secondary glazing, for which no details have been submitted at application stage. Accordingly, details are recommended to be secured via condition (as part of the listed building consent as they relate to internal works), together with standard listed building consent conditions regarding the future painting of any windows/doors and the proposals only relating to the works shown on the plans submitted. As per comments by the Council's Conservation Officer at the time of application PL/23/0202 & PL/23/0203 at section 5.1 above, the proposals are supported in allowing the host building to be refurbished and the active use of the heritage asset building to be maintained and enhanced in the future. This is another acknowledged benefit of the proposals. As such, from a design and heritage perspective the proposals are acceptable subject to the above referenced conditions.

8.4 **Quality of accommodation**

8.4.1 The proposed residential units will be on the upper floors of the building, thereby benefiting from natural light and outlook. Although the existing building is set within a dense urban setting, with the imposing hotel and residential buildings immediately to the west for example, during the officer site visit at the time of applications PL/23/0202 & PL/23/0203 (on a midweek lunchtime dry day in May 2023) the levels of natural light from the existing windows at both the front and rear of the building were adequate and considered to be acceptable within this town centre location.

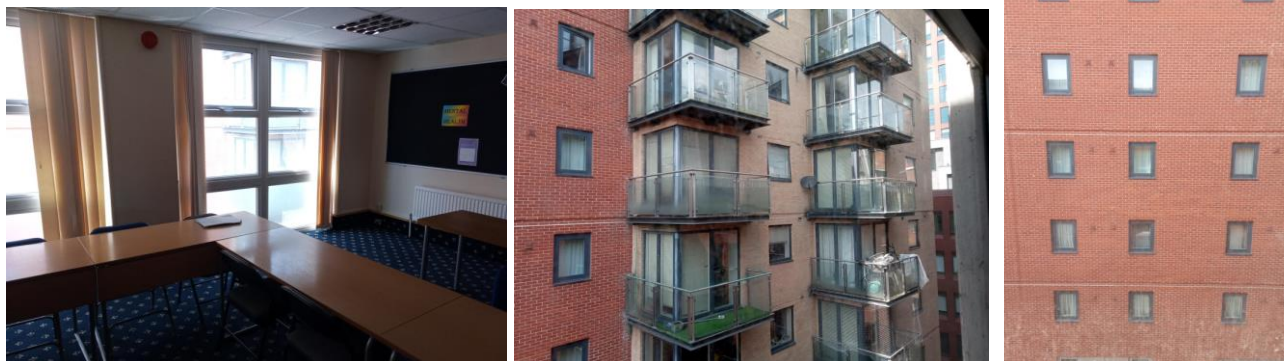
8.4.2 All of the units are regularly shaped and sized, with the constraints of this converting an existing (listed) building and stairs/lifts already being in pre-determined locations. All rooms (barring a home office non-habitable room in Flat 7 at fourth floor level) have access to natural light and outlook, with each unit meeting the minimum national floorspace standards. Although such standards do not apply within Central Reading locations, this is a good indication as to the suitability of the spaces for residential use. Furthermore, dedicated built-in utility/storage and bin stores are specified within each unit, with four of the seven units also showing space for a cycle store within the flat. This is in addition to the basement floor bike store, where a further three spaces are shown (so as to ensure 1 space per unit), and a collective bin store, with the existing lift within the building being utilised to enable ground floor access for these facilities. Both Transport (at the time of the 2023 application and this application) and Waste Services (at the time of the 2023 application, with Waste Services not consulted at the time of this application) consultation responses have confirmed satisfaction with these arrangements, subject to compliance conditions being secured.

8.4.3 In terms of noise and disturbance matters, as per the Environmental Protection (EP) and associated Planning officer comments above at section 5.4, there has been a change in position in the EP comments regarding the noise impacts on the development between the two applications. As per section 5.4 above, given the original permission was satisfied this matter, based on an identical report and not significantly changed context, Planning Officers do not consider the concerns now raised by EP would be sustainable if this matter were considered at appeal. In relation to other noise based matters, while noise generating plant is referenced as being proposed in the application, no details have been submitted and hence a condition would be included as part of any permission at the site. Turning to air quality matters, mitigation is required to make the units acceptable and further details would be secured via condition as per the EP observations above.

- 8.4.4 With regard to crime and safety matters, the submission is considered to be lacking in information concerning the measures to be implemented to ensure the safety of future occupiers. The totality of the information within the DAS appears to be reference that the scheme will *“Deliver high-quality homes that address future lifestyle flexibility and the principles of Secure by Design”* and *“Creates a safe and accessible environment, where the quality of life and community cohesion can prevail, and opportunities for crime and disorder are minimised”*. No actual features or measures have been referenced, with no information in relation to matters such as lighting, CCTV, the entrance lobby (no secondary secure airlock lobby is proposed at ground floor, meaning anybody accessing through the front residential entrance could access the upper floors) and details of the entrance doors. Mindful of the location of the site within the heart of the town centre and the need to ensure the future safety and amenity of occupiers, the lack of information is considered a shortcoming of the application. However, ultimately this matter could be secured via an appropriately worded planning condition, so does not form a reason for refusal of the application itself, as it would be secured via condition in the event of planning permission being granted. Such a condition would benefit future occupiers and the wider area alike.
- 8.4.5 It is acknowledged that there is a potential issue of overlooking/loss of privacy and a lack of outlook/sense of enclosure for future occupiers (and for existing nearby occupiers being harmed by the proposal – separately discussed in the amenity section below) owing to the existence and proximity of Icon House/Projection East residential unit windows/extruding balconies and Ibis/Novotel windows to the west, as per the site plan below (hotel windows are at the 29-35 building):



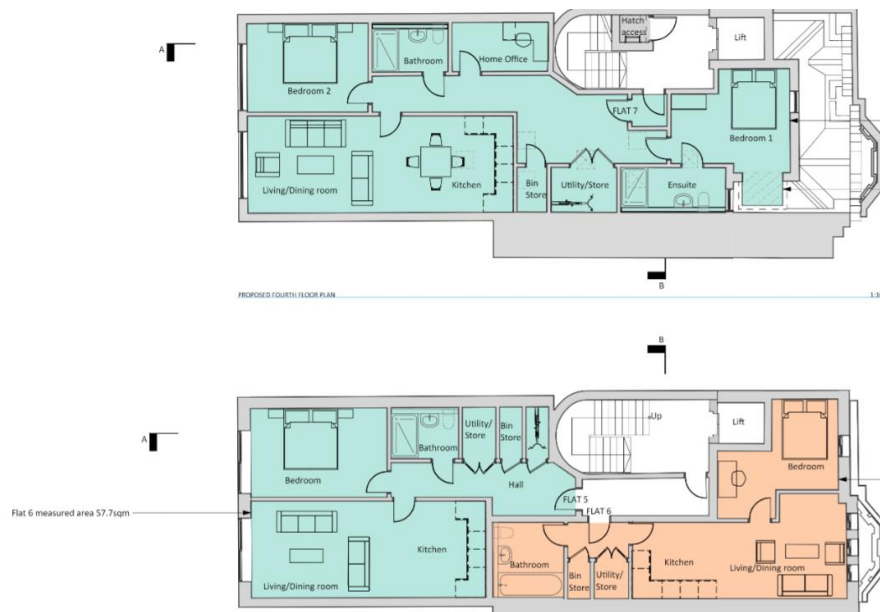
- 8.4.6 As per the site plan above, the existing urban grain is particularly tight at this part of the town centre. The proposal would create direct overlooking to Ibis/Novotel rooms at a distance of 9m, but given the hotel use, it is not considered that this (despite the close distances) would be significantly harmful for future occupiers for this to warrant a reason for refusal on its own.



Above and below: Views from within the application site building showing Icon House windows/balconies and Ibis/Novotel hotel room windows



- 8.4.7 In terms of Projection East / Icon House flats, this relationship is not considered to compromise the quality of accommodation for future occupiers to such an extent to seek to refuse the application on this standalone matter itself. Whilst it is acknowledged that in comparison with the existing position / lawful use, the proposal would cause some harm, the level of overall harm is not so significant to warrant the refusal of the application on this basis alone. The overlooking to future occupiers would not be direct (as verified during the officer site visit), but at a slight offset/angle and the diagonal window to window distance is 8m, reducing to 7m if you take account of the terraces at the neighbouring building. Whilst these distances are acknowledged to be close and provide opportunities which would not be ideal for future occupiers, mindful of the dense urban location and these being converted for residential use, future occupiers will to an extent anticipate some compromises in terms of the quality of accommodation within this context. Furthermore, the layout of the units is such that bedrooms are located in the closest proximity to Projection East/Icon House, with the main living/dining/kitchen space furthest away. Accordingly, the part of the building where it would be expected for future occupiers to use the most (the living/dining/kitchen room) is as far away as possible from the existing flat windows/balconies.
- 8.4.8 Officers have also considered whether it would be advantageous to explore introducing fins/obscure glazing to protect to privacy of future occupiers more than is presently proposed, but there would be a competing impact in this regard in terms of compromising outlook and light. As such, in weighing up the competing issues associated with such arrangements it is considered that the proposed arrangement would be the optimal approach in overall terms. It is therefore considered that for future occupiers this relationship is adequate.



- 8.4.9 In terms of the reconfigured Class E floorspace (specified on the floor plan to be office space, but in reality any use within Class E could operate from the site), this provides a sufficiently active frontage (similar to the current arrangement) and provides appropriate space at basement and part ground floor level, totalling 239.4sqm. Suitable physical separation between the office and residential uses is possible. Separate cycle spaces are shown at rear ground floor level.
- 8.4.10 For clarity purposes, strictly speaking the proposals are not considered to constitute a 'residential conversion', as per Policy H8 and the Residential Conversions SPD (2023). This is as the proposal relates to the conversion of an office building to residential use, rather than residential-residential concerns which the policy and SPD cover. As such, the conversions checklist is not engaged, although in practice the proposal overwhelmingly adheres to such checklist items in any event.

8.5 **Amenity for nearby occupiers**

- 8.5.1 Following on from the quality of accommodation section above, it is considered that for nearby hotel occupiers (to the west) there is a lesser requirement (than residential occupiers) for privacy and outlook, owing to the short-term nature of the accommodation. Set within this context, although the distances are close (9m) and the overlooking would be direct, this is not considered so harmful to seek to resist these proposals on this basis alone. In this regard it is also worthy to note that the neighbouring building to the south of the application site (7-11 Station Road) is already residential in use, with the benefit of a full permission as well as later prior approval (see section 3 of this report for those relevant applications). This results in similar overlooking/outlook issues to those proposed. Although, as a result of these proposals, these impacts would be encountered by a greater number of hotel rooms, in overall terms the level of harm is not significant enough to warrant resisting the proposals on this standalone basis, as the level of the detrimental impact would not be sufficient in the context of these specific proposals..
- 8.5.2 For current/future occupiers at the nearest Projection East / Icon House flats, it is acknowledged that the closest units would include windows at an angled distance of 8m to the closest proposed window at the application site, reducing to 7m when this distance is taken from the existing projecting balcony at these existing residential flats. These residential units are already compromised to an extent through the existing non-residential use at the application site, the residential uses to the south of the application site at 7-11 Station Road and the Novotel/Ibis hotel building. At the time of the officer site visit (on a midweek lunchtime) most existing flats had curtains shut, but it was evident that overlooking into habitable rooms would be possible from the application site. The proposal would introduce new opportunities for overlooking at close quarters, but this is not directly facing and therefore, despite the close distances, it is not considered to result in significant enough detrimental adverse impacts in a dense urban setting. The proposed layout of the flats also assists to a degree, with bedrooms shown at the closest point and the living/dining rooms furthest away to protect nearby occupiers amenity as much as possible. As such, on balance, this element of the proposals is not considered to warrant a standalone reason for refusal, albeit some harm would evidently occur.



Above: View of the rear of the application site building from ground level & aerial view

8.5.3 Given the proposals involve solely change of use matters, no additional daylight and sunlight impacts to any nearby occupiers would occur, and existing nearby occupiers would not be visually dominated by the existing building any more than is possible at present. In terms of noise and disturbance the EP based conditions would protect nearby amenity in addition to that of future occupiers. In respect of all other Policy CC8 factors not referenced above, no harmful detrimental impacts are envisaged to existing nearby occupiers from the proposed development. In summary, whilst there are some privacy/overlooking and outlook shortfalls in the proposals, leading to detrimental impacts, the extent of the harm is not considered significant enough to warrant a reason for refusal on this basis. It is pertinent that this conclusion was similarly reached in relation to application PL/23/0202 at the site in the recent past, with the local physical and policy context not changing significantly in the intervening time. In overall terms the proposals are considered to adequately comply with the general thrust of amenity Policy CC8.

8.6 **Trees, landscaping, ecology and biodiversity**

8.6.1 Given the nature of the proposals lacking any substantive external works and not including any existing on-site existing landscaping (or scope for proposed on-site landscaping), together with the listed nature of the building, there is considered to be limited scope to introduce greening or biodiversity elements into the proposals. While it is recognised that the site is within the air quality management area and one of the two lowest canopy cover wards, hence any incorporation of greening is encouraged, practically providing this is constrained. As such, in this specific instance, it is not considered to be practically possible, or therefore appropriate to seek to secure either landscape provision or biodiversity enhancements.

8.6.2 In terms of biodiversity net gain (BNG), the applicant contends that the development is subject to the de minimis exemption (development below the threshold), given the site is an existing building and area of hard standing, with there being no existing biodiversity on site. The applicant also points out that the site is not a priority habitat, with the proposed development seeking the conversion of the building and it impacts 0sq metres of habitat, as there are no habitats or hedgerows on site. Therefore, the applicant's viewpoint is that it is subject to the de minimis exemption and, even if BNG had applied, given the zero existing rate, by default no improvement would be needed. Officers can confirm that these specific proposals would not engage BNG requirements.

8.7 **Transport**

8.7.1 As per the above transport comments at section 5.2, the proposals would be considered appropriate from this perspective, subject to a number of conditions (relating to parking permits, cycle and waste stores and a construction method statement), which would all be duly secured in the event of permission being granted.

8.8 **Sustainability**

- 8.8.1 The submission has been accompanied by a BREEAM UK Domestic Refurbishment 2014 Pre-Assessment Estimator. This is welcomed in principle in seeking to demonstrate compliance with Policy CC2 and the Sustainability SPD requirements in particular. More specifically, it is notable that sustainable design measures have been facilitated through the scheme, such as building fabric improvements, more efficient heating systems and controls, the application of low energy lighting fittings and a MVHR system. The BREEAM pre-assessment indicates that a 62.10% rating is anticipated to be achieved, which is within the required 'Very Good' rating.
- 8.8.2 Two planning conditions would be required to secure the BREEAM Very Good rating in practice. The first relates to securing an Interim BREEAM Very Good rating Certificate at the pre-commencement stage. The second would secure a Final BREEAM Excellent rating Certificate prior to the first occupation of the basement or second/roof level unit. These conditions are necessary to ensure the development is carried out in accordance with sustainable building standards, adhering to both Policy CC2 and the guidance within the Sustainable Design and Construction SPD.

8.9 **Planning Balance and Conclusions of both planning and listed building consent applications**

- 8.9.1 Planning Application PL/25/0395 - The planning application is required to be determined in accordance with the development plan unless material considerations indicate otherwise, as per Section 38(6) of the Planning and Compulsory Purchase Act 2004. The application has therefore been carefully considered in the context of the Reading Borough Local Plan 2019, the NPPF 2024 and the previously approved permission at the site (Ref PL/23/0202).
- 8.9.2 With regard the status of the Local Plan, the current version of the Local Plan (adopted in November 2019) turned five years old on Tuesday 5th November 2024. The Local Plan was reviewed in March 2023 and around half of the policies in the plan are considered still up to date. However, the rest needed to be considered for updating to reflect changing circumstances and national policy. The submission draft of the Local Plan Partial Update was submitted on 9th May 2025. Although there is a five-year period for carrying out a review of a plan after it is adopted, nothing in the NPPF or elsewhere says that policies automatically become "out of date" when they are five years old. It is considered in respect of the Local Plan policies pertinent to this application that they remain in accordance with national policy and that the objectives of those policies remains very similar in the draft updated Local Plan, aside from Policy H1 which is accepted to be out of date. Therefore, they can continue to be afforded weight in the determination of this planning application and, aside from Policy H1, are not considered to be 'out of date'.
- 8.9.3 It is important to consider that the emerging Local Plan, and the NPPF, both require an increased provision of housing, rather than any reduction. Noting that the existing Local Plan, the emerging Local Plan and the NPPF are all aligned in their overall objective of creating mixed and balanced communities, and the delivery of an appropriate mix of housing types for the local community which includes affordable housing (NPPF Para 63). When considering the relative weight to be given to the various benefits and harms identified, it should be in the context of this need for housing which meets identified needs. It would be acting against these objectives to use a policy deemed "out of date" because of increased housing requirements to justify a reduced amount of affordable housing which is an intrinsic part of meeting the identified need for increased housing supply.
- 8.9.4 It is also considered that any harm in respect of meeting identified housing need, once identified, is far from being an abstract concept and will have direct impacts on the housing of local residents. This is not to deny or lessen any benefits which might outweigh this harm and could, if sufficient, still outweigh the harm, but must be clearly demonstrated.

8.9.5 Notwithstanding the above and for completeness, in terms of the status of the Local Plan, paragraph 11 of the NPPF sets out a framework for decision making where policies are considered out of date, set within the context of the presumption in favour of sustainable development:

For **decision-taking** this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance⁷ provides a strong reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination⁹.

8.9.6 To clarify, Footnote 7 specifies:

⁷ The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.

8.9.7 Assets of particular importance in respect of the current proposal is the listed building (designated heritage asset) of the application site, together with the setting of nearby listed buildings identified at paragraph 1.3 of this report. In this regard, it is acknowledged that allowing the host building to be refurbished and the active use of the heritage asset building being maintained and enhanced in the future are a benefit of the proposals. This component therefore weighs in favour of the proposal.

8.9.8 In addition, Footnote 9 specifies:

⁹ The policies referred to are those in paragraphs 66 and 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11; and 135 and 139 of chapter 12.

8.9.9 Considering each of these matters in turn, the following is confirmed:

8.9.10 Paragraph 66 – Affordable housing – not strictly applicable, given this is below the threshold of a major development. However, as per the separate appraisal above, the lack of an appropriate contribution towards affordable housing is a significant shortfall of the proposal.

8.9.11 Paragraph 84 – Rural housing – not applicable to this proposal.

8.9.12 Paragraphs 110 & 115 – Sustainable transport - the proposal is acknowledged to be within a sustainable location near to services and facilities, whilst also being car-free and providing cycle parking. However, it is considered that realistically this would be true of any housing in this location and does not in itself justify the particular form of development proposed and is therefore largely neutral in terms of weight.

8.9.13 Paragraph 129 – Achieving appropriate densities – Whilst the density is high, it is considered appropriate given the sustainable location and in the interests of making

efficient use of the land. However, the viability information submitted by the applicant, suggesting that despite the high density of development, local market / site conditions equate to a negative viability position (in the viewpoint of the applicant), with this representing a barrier to the delivery of development. It is also apparent that the proposal would not provide for the identified need for different types of housing due to the lack of any affordable housing contribution being proposed.

- 8.9.14 Paragraphs 135-139 – Achieving well-designed places – the lack of design changes proposed means the proposal does not conflict with this component. However, it is considered that realistically this would be true of many uses in this location and does not in itself justify the particular form of development proposed and is therefore largely neutral in terms of weight.
- 8.9.15 In overall terms, whilst the provision of residential units in a sustainable location and the refurbishment and active use of the heritage asset building being maintained and enhanced in the future are acknowledged benefits of the proposals. However, these are general benefits which would also be capable of being achieved within a scheme which provides an appropriate contribution towards affordable housing too. It is therefore not essential that this proposal is approved in order to realise these benefits.
- 8.9.16 There are significant adverse impacts too. The failure to meet identified housing need in the Borough in the form of a justified appropriate contribution towards affordable housing amounts to substantial harm. The absence of a justified affordable housing contribution will have practical, tangible and absolute impacts on the ability of the Borough to house its residents and would be in direct conflict with the aims and objectives of existing and emerging development plan policy and the NPPF in respect of achieving sustainable, mixed and balanced communities. Taking account of the Framework as a whole, it is considered that the benefits of the proposal are significantly and demonstrably outweighed by the harm in respect of the absence of making an appropriate contribution towards affordable housing in this case.
- 8.9.17 The Council's view that the relevant policies of the Local Plan are not out of date, nevertheless for completeness the 'tilted balance' engaged by paragraph 11 of the NPPF is addressed above. Even if relevant policies were considered out of date (which, for completeness, they are not) the provisions of NPPF paragraph 11 still do not support the granting of planning permission in this specific instance.
- 8.9.18 Listed building consent application PL/25/0410 – Listed Building Consent is separately considered to be acceptable, as in listed building terms there are no policy conflicts for the works proposed. Accordingly, listed building consent can be granted subject to conditions. However, this comes with a clear caveat, as referenced within a recommended informative, that listed building consent is granted on a strictly notwithstanding basis to the separate requirement for Planning Permission being required for the works shown on the approved plans. The informative will go on to clarify that separate Planning Permission application PL/25/0395, as submitted simultaneously with the Listed Building consent application, has been refused planning permission. The informative will also note that separate planning permission PL/23/0202 was granted at the site on 16/12/2024, following completion of S106 Legal Agreement. Permission PL/23/0202 could, at the time of writing, be implemented alongside this Listed Building Consent, or that separately granted under application PL/23/02023 on 16/12/2024.

9 RECOMMENDATION

- a) Refuse Planning Permission
- b) Grant Listed Building Consent subject to conditions

PL/25/0395 reason for refusal:

1. The proposed development, by reason of its lack of an appropriate contribution towards the provision of Affordable Housing, and in the subsequent absence of a completed legal agreement to secure an appropriate contribution towards the provision of Affordable Housing, together with associated obligations, fails to make an appropriate contribution to the housing needs of Reading Borough, contrary to Policies H3 and CC9 of the Reading Borough Local Plan 2019 and the Council's Adopted Supplementary Planning Documents on Affordable Housing (2021) and Planning Obligations under Section 106 (2015), alongside paragraphs 9, 11, 12, 39, 48, 56, 58, 59, 61, 63 and 64 of the National Planning Policy Framework (December 2024, as amended).

Informatives

1. The decision relates to the following drawings and documents (only the most recent and relevant drawings and documents are referenced):

2209-PL-01 Location Plan & Block Plan
 2209-PL 02/a Existing Floorplans 01
 2209-PL 03/a Existing Floorplans 02
 2209-PL 04/a Existing Floorplans 03
 2209-PL 05 Existing Roof Plan
 2209-PL 06/b Existing Elevation 01
 2209-PL 07-A Existing Elevation 02
 2209-PL 08-A Existing Sections
 2209-PL 09/b Proposed Floorplans 01
 2209-PL 10/b Proposed Floorplans 02
 2209-PL 11/b Proposed Floorplans 03
 2209-PL 12 Proposed Roof Plan
 2209-PL 13/b Proposed Elevation 01
 2209-PL 14-A Proposed Elevation 02
 2209-PL 15/b Proposed Sections
 As received 10/09/2025

- Planning and Heritage Statement Including Sustainable Drainage Information, Sustainability Statement and Waste storage and collection - 13-15 Station Road, Reading by Bell Cornwell LLP
- Design and Access Statement by iB Architects dated 10 January 2023 Ref 2209
- Noise Assessment by Hawkins Environmental dated 26th January 2023, Ref H3663 - NV – v2
- Air Quality Assessment by Hawkins Environmental dated 26th January 2023, Ref H3663 - AQ – v2
- Market Report on letting activity and commercial market commentary by Hicks Baker dated January 2023
- Letter by Bell Cornwell '13-15 Station Road, Reading' Ref 2557, dated 13/03/2025
- Transport Statement by Evoke Transport Ref R-22-0132-TS-01A dated 16 February 2023
- Financial Viability Appraisal by S106 Management dated 12/02/2025
- Schedules 1 – 5 associated with the Financial Viability Appraisal by S106 Management
As all received on 14/03/2025
- Budget Estimate of Costs for refurbishment, alteration and conversion of existing building to create 7nr apartments and 1nr retail unit at 13-15 Station Road, Reading, RG1 1LG FOR Faye and Yara Ltd by David R Parker dated February 2025 (.pdf and .doc versions received), as received 26/03/2025
- Email from s106 Management 'Re: 13-15 Station Road, Reading - PL/25/0395 (update)', dated 08/08/2025
- Financial Viability Assessment '13-15 Station Road, Reading, RG1 1LG', by Colliers International UK, dated 27/06/2024, as received 08/08/2025
- Photos of the Building, 5 pages, as received 08/08/2025

- Report and Valuation for Faye and Yara Ltd by TM Hughes Property Consultant, dated 11/08/2023, as received 08/08/2025
 - BREEAM UK Domestic Refurbishment 2014 Pre-Assessment Estimator v0.1 '13- 15 Station Road Reading RG1 1LG', as received 29/10/2025.
2. The local planning authority has worked with the applicant in a positive and proactive way by clearly setting out concerns relating to the proposal and providing an opportunity for the applicant to amend or withdraw the application. However, the applicant chose not to withdraw the application, hence the issuing of this refusal notice within the agreed extended timeframes.
 3. The applicant is advised that the refused scheme, had it been able to be approved, would have been a CIL (Community Infrastructure Levy) liable development.
 4. Without prejudice to any future application or appeal, the applicant is advised that the elements in the reason for refusal relating to a legal agreement could be overcome by entering into a Section 106 Legal Agreement or unilateral undertaking for a scheme that was in all other respects acceptable, in respect of the following (summarised matters):
 - A financial contribution towards affordable housing elsewhere in the Borough of £37,331
 - An appropriate Deferred Affordable Housing Contribution Mechanism
 - Should the application site subsequently be extended/alterd to create further residential units then contributions towards affordable housing would apply on a cumulative basis also taking into account this application.

PL/25/0410 conditions and informatives

1. The works hereby permitted shall begin no later than three years from the date of this consent.

Reason: In accordance with Section 18 of the Planning (Listed Building and Conservation Areas) Act 1990 as amended by section 51 of the Planning and Compulsory Purchase Act 2004.

2. The works to the Listed Building hereby permitted shall be carried out only in accordance with the following approved plans or specifications:

2209-PL 09/b Proposed Floorplans 01
 2209-PL 10/b Proposed Floorplans 02
 2209-PL 11/b Proposed Floorplans 03
 As received 10/09/2025

Reason: For the avoidance of doubt and to ensure that the development is carried out in accordance with the Listed Building Consent hereby approved and in order to protect the special historic and architectural character of the listed building, in accordance with Policy EN1 of the Reading Local Plan 2019.

3. Prior to the first occupation of any residential unit, plan, elevation and section drawings, with materials annotated, of the proposed secondary glazing on the front (east) elevation windows at first, second, third and fourth floor level, at a minimum scale of 1:10, shall be submitted to and approved in writing by the local planning authority. The relevant part of the works shall not be carried out otherwise than in full accordance with the details thus

approved and shall be installed prior to the first occupation of any residential unit and retained and maintained as such thereafter.

Reason: These details are required due to insufficient information being contained within this submission and in order that the special architectural and historic interest of this Listed Building is safeguarded in accordance with Policy EN1 of the Reading Borough Local Plan 2019.

4. Any painting of timber framed windows and exterior doors shall be painted with oil-based gloss paint.

Reason: In order that the special architectural and historic interest of this Listed Building is safeguarded in accordance with Policy EN1 of the Reading Borough Local Plan 2019.

5. All new external and internal works and finishes, and any works of making good, shall match the existing original fabric in respect of using materials of a matching form, composition and consistency, detailed execution and finished appearance, except where indicated otherwise on the drawings hereby approved.

Reason: In order that the special architectural and historic interest of this Listed Building is safeguarded in accordance with Policy EN1 of the Reading Borough Local Plan 2019.

Informatives:

1. This Listed Building Consent is granted on a strictly notwithstanding basis to the separate requirement for Planning Permission being required for the works shown on the plans hereby approved. Separate Planning Permission application PL/25/0395, as submitted simultaneously with this Listed Building consent application, has been refused planning permission. However, Planning application PL/23/0202 (for change of use from office (Class E) to 7 residential units (Class C3) at part-basement floor, part-ground floor and first to fourth floor levels, cycle storage facilities at rear ground floor level and replacement rooftop mechanical plant) was granted at the site on 16/12/2024, following completion of S106 Legal Agreement. Permission PL/23/0202 could, at the time of writing, be implemented alongside this Listed Building Consent, or that separately granted under application PL/23/02023 on 16/12/2024.
2. Officers have worked positively and proactively with the applicant to determine the application within the agreed extended timeframes in conjunction with the associated application for full planning permission.
3. For the avoidance of doubt, no other works are approved except those as authorised by this Consent. Any other works required to the Listed Building may require a separate application for Listed Building Consent and/or an application for Permitted Works to a Listed Building.