

154 Friar Street, Reading, RG1 1HE

Planning Statement

March 2026

spring

CONTENTS

1.	INTRODUCTION
2.	SITE DESCRIPTION & BACKGROUND
3.	APPLICATION PROPOSALS
4.	PLANNING POLICY CONTEXT
5.	PLANNING ASSESSMENT
6.	CONCLUSIONS

1. INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of the applicant, Bezalel Yerushalmy & Son Felt Production Ltd, in support of a full planning application at 154 Friar Street, Reading (“the site”).
- 1.2 The application seeks planning permission and Listed Building Consent for the change of use of the upper floors of the building to serviced accommodation units (Class C1) and associated external and internal works.
- 1.3 This Statement should be read alongside the application drawings prepared by DHA Architects, the Heritage Statement prepared by Paul Stamper Heritage as well as all other documents submitted as part of the application.
- 1.4 This Statement sets out the background to the site, outlines the proposals and assesses how these comply with the relevant planning policy and guidance at local and national level.
- 1.5 Chapter 2 will now outline the site and its context.

2. SITE DESCRIPTION & BACKGROUND

- 2.1 The site lies within the City Centre on the south side of Friar Street and comprises a three storey building, occupied by retail on the ground floor and offices on the first and second floors.
- 2.2 The site is surrounded by a mixture of other town centre uses predominantly retail uses at street-level and a mixture of offices and residential accommodation to upper floors.
- 2.3 The site lies within Flood Zone 1 and is not at significant risk of flooding.
- 2.4 The site location and streetview can be seen below at Figure 2.1.

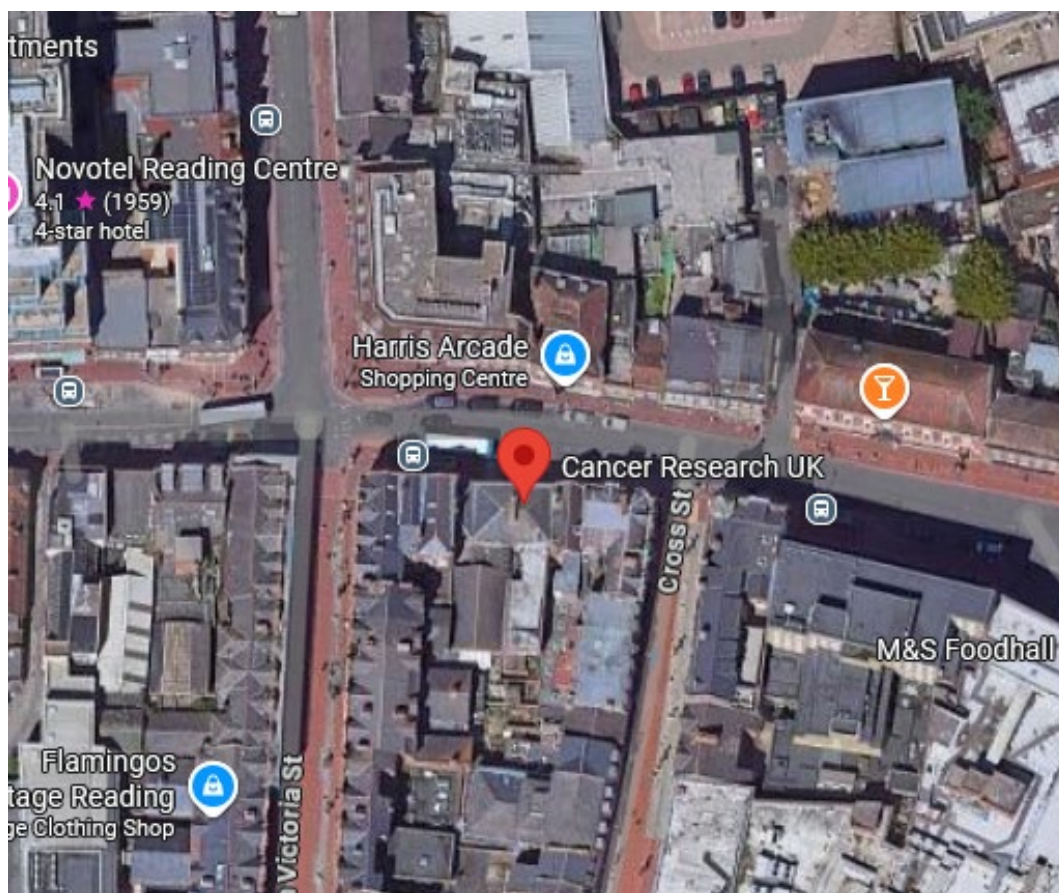




Figure 2.1 : Site Location and Streetview (Google Maps)

2.5 The building is Grade II Listed. The official list entry is given below:

FRIAR STREET (South Side) No 154.

II

2. Formerly a pair with No 153 (too altered to include). Circa 1800. 3 storeys, red brick with stone cills to 1st floor and stone coping to parapet. 2 ranges of glazing bar sashes. Modern shop front.

2.6 There are a number of listed buildings close to the application site, including the neighbouring site at 155 Friar Street, which is also Grade II Listed. The location of the Listed buildings within the vicinity are shown in Figure 2.2.



Figure 2.2: Listed Buildings.

2.7 The Reading Borough Council Local Plan Proposals Map (see Figure 2.3) indicates that the site lies within the following designations:

- Reading Central Area
- Air Quality Management Area
- Primary Shopping Area
- Central Core
- Office Core
- Area of archaeological potential



Figure 2.3 : Proposal Map extract

- 2.8 The site is in a highly sustainable location, with immediate access to services, facilities, and public transport links.

Planning History

A comprehensive review of the Statutory Register of Planning Applications held by the Council has been carried out and there is no planning history of relevance to this proposal.

- 2.9 Chapter 3 will now outline the application proposals.

3. APPLICATION PROPOSALS

- 3.1 Full details of the proposals are outlined in the drawings and Design and Access Statement prepared by DHA Architects which accompany this application.
- 3.2 The application seeks full planning permission for the conversion of the first and second floors of the building to residential serviced apartments (Class C1). The ground floor would remain in retail use.
- 3.3 The layout of the proposed scheme would see the creation of 1 No. studio unit (35.2 sq.m) and 1 No. 2 bedroom unit (68.8 sq.m) to the first floor and 1 No. studio unit (34.6 sq.m) and 1 No. 2 bedroom unit (69.1 sq.m) to the second floor.
- 3.4 The layout has been designed to minimise impact on the existing internal positioning of walls and to ensure that all habitable rooms benefit from natural light from windows.
- 3.5 The proposals would not involve any significant external changes to the building, apart from some repairs to the windows on the front elevation. It is considered that these would be beneficial to the appearance of the building.
- 3.6 A full schedule of the proposed internal and external works are submitted as part of the application.
- 3.7 The proposed floorplans are shown in Figure 3.1.

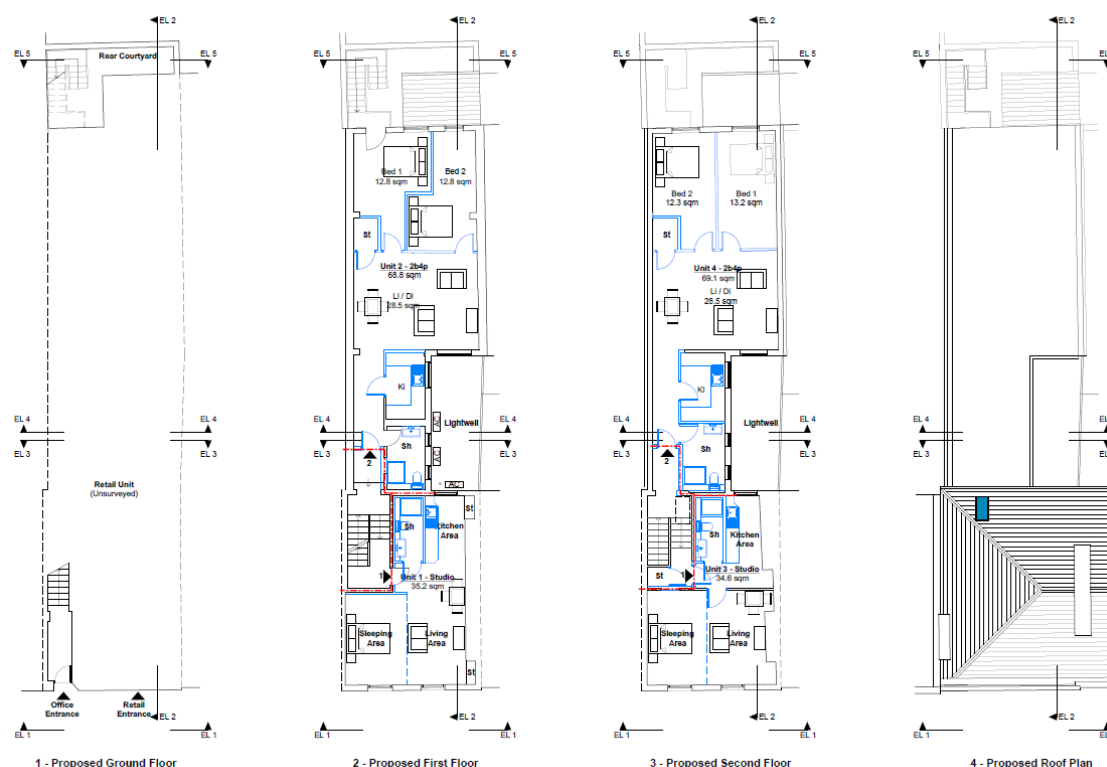


Figure 3.1 Proposed Floorplans

- 3.8 Access to the building would remain as per the existing arrangements. Refuse provision would be as existing.
- 3.9 In the modern rear range it is proposed to replace the existing windows with timber-famed double-glazed casement windows which will give a significant enhancement to the performance of the fabric.
- 3.10 The upper floors are currently heated on a single heating system, powered by a gas boiler located off the 2nd floor kitchenette. It is proposed to introduce new independent heating systems for each unit. Accordingly it is proposed that air-conditioning condensers serving the 1st and 2nd floors are removed from the 1st floor lightwell and heat pumps for proposed Unit 2 on the 1st floor and Unit 4 on the 2nd floor are installed in lieu. Other improvements to the building are outlined in the Design and Access Statement.
- 3.11 Chapter 4 will now outline the planning policy context for the determination of the proposals.

4. PLANNING POLICY CONTEXT

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The Courts have held that the Government's statements of planning policy are such 'material considerations' which must be taken into account, where relevant, in decisions on planning applications.

National Planning Policy Framework

- 4.3 At the national level, the Revised National Planning Policy Framework (NPPF) (2024) outlines guidance which is relevant to the proposals.
- 4.4 The NPPF at Paragraph 8 outlines that there are three overarching objectives of the planning system in achieving sustainable development: economic, social and environmental. Importantly the NPPF states that all of these dimensions must be satisfied.
- 4.5 Paragraph 124 requires that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.
- 4.6 Chapter 12 requires Local Authorities to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings.
- 4.7 At Paragraph 207 the NPPF states that:

'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'.

- 4.8 In addition, paragraph 212 states:

'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)'.

Planning Practice Guidance

- 4.9 On 6 March 2014 the DCLG published the Planning Practice Guidance (“PPG”) web-based guidance, and this has been the subject of a number of subsequent updates.

LOCAL PLANNING POLICY

- 4.10 The current local plan is the Reading Borough Local Plan (2019). The current version of the Local Plan is more than 5 years old and was reviewed in March 2023. A consultation version of the draft update of the Local Plan was published on 6th November 2024.
- 4.11 The Local Plan Partial Update was submitted to the Secretary of State on 9th May 2025. Submission marks the beginning of a process of public examination led by an independent Inspector. Due to the stage of examination, the draft Local Plan is of limited weight.

Other Material Considerations

- 4.12 The following supplementary guidance is of relevance to this application:
- Revised Parking Standards and Design (2011)
 - Residential Conversions (2023)
 - Planning Obligations Under S106 (2015)
 - Sustainable Design and Construction (2019)
- 4.13 The key planning policy issues will now be considered in Chapter 5.

5. PLANNING AND HERITAGE ASSESSMENT

- 5.1 The following section outlines a review of the key planning and heritage policy considerations relevant to the application proposals.

Principle of Development – Loss of Existing Use

- 5.2 The NPPF states that LPAs should “*encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value*” and “*promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops...*”.
- 5.3 Chapter 7 of the NPPF seeks to ensure the vitality of town centres, requiring that “*...planning decision support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation...*”
- 5.4 With regards to the existing office use, Policy EM3 seeks to maintain the overall level of employment land within the Core Employment Areas. In this case, the site does not lie within a Core Employment Area.
- 5.5 The upper floors of the building have been vacant since circa 2020 and have been marketed since this time.
- 5.6 Local Agents, Hicks Baker, have advised that there is virtually no demand for office space of this size and quality in the town centre. They are currently marketing similar space at 7-11 Cross Street which has been on the market since February 202 and 30-31 Friar Street since November 2021. Both of these properties remain unlet.
- 5.7 It is therefore considered that the loss of the existing office space is acceptable in principle.

Principle of Development – Proposed Class C1 Use

- 5.8 Local Plan Policy CR1 supports a mix of uses across the Central area, with paragraph 5.2.5 of the Local Plan stating:
- “A key theme that underpins the strategy and the context in which it should be read is of a mix of uses across the central area, both vertically and horizontally, although the emphasis will differ in different areas...”*
- 5.9 The Strategy for Central Reading as set out in section 5.2 of the Local Plan sets out key principles for the area, including:

“...a. The centre will contain a broad range of different but complementary uses within an area easily accessed by foot.

b. The centre will appeal to all sectors of Reading’s population as a place to live in, work in, study in and visit.

c. New development will exhibit an excellent, safe and sustainable quality of design that contributes to the attraction of the centre.

d. The centre will make the most of its waterside areas as a destination for leisure and recreation, and protect and enhance wildlife habitats...”

5.10 Policy RL2 of the Local Plan states that retail and main town centre leisure and cultural development, such as that proposed, will take place in, or as an extension to the centre of Reading. Furthermore, it is recognised at both national and local level that the introduction of residential accommodation – albeit in this case for short stay - within centres serves to enhance the vitality and viability of those areas.

5.11 In addition, there is a specific reference made to serviced apartments within Policy CR6 of the Local Plan, where it is stated:

“...iv) Where proposals for serviced apartments and apart-hotels fall outside the C3 use class, they will be located within the Central Core. Such proposals will not be permitted unless the duration of occupation of residents is restricted, to ensure the units are used on a short stay basis and not as residential flats, and information monitoring the implementation of this restriction is regularly supplied”.

5.12 The proposals seek the change of use of the upper floors of the building to provide 4 units as Class C1 ‘serviced accommodation’. The site is on previously developed land within the town centre and is therefore considered suitable for such development in principle and accords with policy objectives.

5.13 The ground floor of the building is outside of the scope of this application, but its retention as retail would be in accordance with Policy CR7 which states that primary frontages in Central Reading at ground floor level remain as Class E/ similar uses to maintain an active frontage.

5.14 Given the policy assessment above, it is therefore clear that the principle of development for this proposal is acceptable, subject to consideration of the following material considerations.

Design

- 5.15 The Government attaches great importance to the design of the built environment within the NPPF. Paragraph 131 states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 5.16 Chapter 12 of the NPPF requires Local Authorities to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings.
- 5.17 Policy CC7 (Design and the Public Realm) seeks to ensure that new development enhances and preserves the local character and Policy CR2 (Design in Central Reading) seeks to ensure that acceptable relationships between buildings in the town centre are created. Policies EN1, EN3, and EN6 seek collectively to protect designated heritage assets (including listed buildings and conservation areas).
- 5.18 The proposal would involve some external alteration, with the replacement of the windows to the rear elevations and new improved equipment associated with the heating system. The proposal would therefore not impact on the streetscene or wider character of the area. The change of use would however provide a viable future use for this building, and provide the financial impetus for long term investment into the property.
- 5.19 Accordingly, the proposal is considered to accord with local and national design policies.

Heritage

- 5.20 Paragraph 205 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 5.21 Paragraph 207 adds that permission should be refused if works would result in the total loss of the significance of a designated heritage asset unless it is necessary to achieve substantial public benefits. Paragraph 208 states that less than substantial harm should be weighed against the public benefits of the proposal.
- 5.22 The application site is Grade II listed and a Heritage Statement has been provided with the application submission. The Statement sets out the site history and assesses the proposal and its potential heritage impacts.
- 5.23 The conclusion of the Statement is that given the existing lack of interior historic features, the scope of the internal works and the minimal works required externally, the proposal would cause no harm

to the listed building and its significance. Furthermore, the creation of residential accommodation would return the building's upper floors back to residential use to reflect the original function of the premises.

- 5.24 In the light of the points set out above it is considered that the proposal would be acceptable in terms of heritage.

Residential Amenity

- 5.25 Policy CC8 (Safeguarding Amenity) seeks to ensure that both the amenity of neighbouring properties and the amenity of future occupiers is adequately protected. The proposals are for short stay accommodation and therefore the requirements for residential dwellings do not apply to the units.
- 5.26 There is a mix of commercial and residential properties within the area, including other serviced apartments. The proposed units have been designed to ensure that natural light is received into all habitable rooms and the layout has been carefully considered to ensure that there are no issues in terms of overlooking or loss of privacy to surrounding uses.
- 5.27 The proposed development is located within an air quality management area. However, as the units are at first and second floor level there is unlikely to be levels of pollutants above the objective limit value.
- 5.28 Given the above, it is considered that the proposed development would be acceptable in accordance with the NPPF and Local Plan policies.

Highways

- 5.29 NPPF at Paragraph 111 states: *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."* The NPPF states that opportunities to promote walking, cycling and public transport use should be identified and pursued.
- 5.30 Policies TR3 (Access, Traffic and Highway related matters), TR1 (Achieving the Transport Strategy) and TR5 (Car and Cycle Parking and Electric Vehicle Charging) seek to address access, traffic, highway and parking relates matters relating to development.
- 5.31 The Revised Parking Standards and Design SPD classes the application site as within Zone 1. This area is at the very heart of the Borough and has the best transport hubs. Given the sustainable location and the proposed land use, it is therefore considered that car- free development is acceptable.
- 5.32 Overall, the proposed development will be adequately served in terms of access and transport without creating any perceptible impact on the existing local network in terms of traffic flow or road safety.

Sustainability

- 5.33 Chapter 14 of the NPPF addresses “Meeting the challenge of climate change, flooding and coastal change” and Paragraph 148 summarises that:

“The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure”.

- 5.34 Policy CC2 (Sustainable Design and Construction) requires new development to reduce the consumption of resources and materials.
- 5.35 With regards to sustainability the proposals have been designed to improve overall energy consumption of the building and to incorporate appropriate modern technology to produce a sustainable development with minimum CO2 emissions.
- 5.36 The existing gas powered heating system would be replaced along with the rear windows, both of which would improve the efficiency of the building.
- 5.37 Given that the proposal would be a conversion of a Listed Building, there are limitations on the introduction of energy saving technology, however the aim would be to incorporate as many measures as possible to lower energy consumption.

Ecology

- 5.38 Paragraph 187 of the NPPF states that ‘*Planning policies and decisions should contribute to and enhance the natural and local environment...*’
- 5.39 The development only relates to the change of use of the building. The site contains hardstanding or built form in its entirety. Therefore, the requirements of policy EN12 (no net loss of biodiversity) are met.

6. CONCLUSIONS

- 6.1 This Planning Statement has been prepared by Spring Planning to accompany the submission of an application for full planning permission and listed building consent at 154 Friar Street, Reading. This statement has provided an overview of the application site and its surrounding context as well as a detailed assessment of the proposals in relation to the appropriate planning policy documents.
- 6.2 In summary, the application seeks planning permission for the conversion of the uppers floors to provide 4 No. Class C1 serviced apartments and associated internal and external works. The ground floor would remain retail and falls outside of the scope of this application.
- 6.3 It is considered that the scheme adheres with the Development Plan and the NPPF. The scheme is considered to be acceptable in principle and would provide appropriate accommodation in this central town centre location whilst making use of currently redundant office space. The proposal would add to the vitality of the area and support the function of Reading town centre.
- 6.4 The design of the proposals has been carefully considered to ensure that there is no adverse impact on the significance of the Heritage asset.
- 6.5 The scheme would not give rise to any highways safety issues and the scheme would not result in any adverse issues in relation to amenity, or ecology.
- 6.6 We therefore urge the Council to approve the application without delay.