



Astec House

187-198 Kings Road, Reading, RG1 4EX

April 2026



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1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by hgh Consulting on behalf of The Bagri Foundation, in support of a full planning application and listed building consent for a change of use and conversion of the Class E (office) floorspace to 29 student accommodation units, together with associated external works including landscaping at Astec House, 187-189, Kings Road, Reading, RG1 4EX ('the Site'). The application is submitted to Reading Borough Council ('RBC').
- 1.2 Established in 1990, The Bagri Foundation was created to support education and to fund relief initiatives. Since its inception, three generations of the family have broadened and diversified the Foundation's activities, expanding to support health initiatives and a public-facing arts and culture programme. The Foundation has a proven record of delivering high-quality student accommodation, including the neighbouring site at 191 Kings Road.
- 1.3 Planning permission and listed building consent is sought to redevelop this underutilised and currently vacant office building, which includes associated hardstanding to the rear used for car parking, in order to bring the Site back into active and beneficial use.
- 1.4 Full Planning Permission is sought for the following description of development (herein referred to as 'the Proposed Development'):

"Change of use and conversion of the existing vacant Grade II listed building at 187-189 Kings Road from office use (Class E) to student accommodation (sui generis), together with associated internal and external alterations, landscaping, cycle and refuse storage, and all ancillary works (herein referred to as the 'Proposed Development')".

- 1.5 Since acquiring the applicant had brought a core technical team together who have progressed the current design through a productive pre-application discussion with RBC officers.
- 1.6 This Planning Statement has been prepared by hgh Consulting and details the planning case for the Proposed Development. It considers the development in the context of adopted and emerging planning policy and guidance across national, regional and local levels together with the context of the site, planning history and other material considerations.
- 1.7 The remainder of the Planning Statement is structured as follows:
 - (a) Section 2 - Site Context
 - (b) Section 3 - Planning History and Pre-application discussion
 - (c) Section 4 - Application Proposal
 - (d) Section 5 - Planning Policy Framework and Overview
 - (e) Section 6 - Planning Policy Assessment
 - (f) Section 7 - Planning Benefits
 - (g) Section 8 - Summary

1.8 This Planning Statement should be read in conjunction with other supporting information that accompanies the application, including:

- (a) Planning Application and Community Infrastructure Levy Form, prepared by hgh Consulting;
- (b) Application Drawings, prepared by Mountford Pigott;
- (c) Air Quality Assessment, prepared by Ecolytik;
- (d) Contaminated Land Survey, prepared by Subadra
- (e) Daylight Sunlight Assessment, prepared by Ecolytik;
- (f) Design and Access Statement, prepared by Mountford Pigott;
- (g) Ecological Survey and Report, prepared by Arbtech;
- (h) Energy efficiency statement, prepared by Ecolytik;
- (i) Heritage Statement, prepared by Heritage Planning;
- (j) Landscape principles, prepared by Mountford Pigott;
- (k) Materials details (internal and external works), prepared by Mountford Pigott;
- (l) Noise and vibration assessment,
- (m) Sustainability statement (including BREEAM), prepared by Ecolytik;
- (n) Transport Information (including Vehicle (including cycle) parking and waste collection details) & Student Management Plan), prepared by Markides
- (o) Tree Survey, prepared by Keen Consultants;
- (p) Arboricultural Impact Assessment, prepared by Keen Consultants;
- (q) Arboricultural Method Statement, prepared by Keen Consultants; and
- (r) Structural information to support works (by a CARE registered engineer), prepared by Morton Partnership.

2.0 SITE CONTEXT

- 2.1 The Site measures (0.19ha) (the primary site measures 0.11ha and the access area measures 0.08ha), located on the north side of Kings Road, opposite the junction with Eldon Road (to the south) within Reading Borough Council ('RBC'). A detailed description of the Site and surrounding area is set out within the Design and Access Statement (DAS), together with other supporting documents listed above at paragraph 1.10. The following provides an overview for this Planning Statement.

Site Description

- 2.2 The properties at 187-189 Kings Road are collectively known as 'Astec House'. The Site is a vacant office building which includes hardstanding for car parking to the rear. Following the removal of the party wall between both properties in circa 1960s, both properties are used as a single space that could not be used without significant physical alteration which would require listed building consent (LBC) to undertake. Towards the rear of the proposed application boundary is a large Oriental Plane tree which is subject to a Tree Preservation Order (TPO).
- 2.3 The Site itself is a Grade II Listed Building (listing entry: 1321921)
- 2.4 located within the Eldon Square Conservation Area. The listing entry describes the building as:

"KINGS ROAD 1. 5128 (North Side) Nos 187 and-189 SU 7273 7/139 24.10.74. II GV 2. After 1832, part of Waterloo Place. 3 storeys and basement. Bath stone. Slate roof. Rusticated ground floor, moulded let floor cill string. Dentil cornice entablature and blocking course. A symmetrical pair of houses. Bays, ground and let floors retain most glazing bar sashes. 1st floor windows have architrave surround and moulded cornice on console brackets. 2 windows on ground floor with contemporary balconies and cast-iron balustrades (honey-suckle pattern). 6 panel doors (part glazed) at sides under Doric porches, approached by steps. 2 storey extension to right of No 189 with 1 window. The contemporary Orts Road 'service' houses have recently (1977) been demolished"

- 2.5 As shown on the Proposals Map in Figure 2, The Site is allocated within with RBC Local Plan 2019 (hereinafter known as 'the Local Plan'), (CR14l) for 'Change of use of listed buildings from offices to residential or student accommodation'. The Site also lies within the Central Reading area, an Air Quality Management Area (AQMA) and is identified as part of the Local cycling and Walking Infrastructure Plan (LCWIP)

3.0 PLANNING HISTORY AND PRE-APPLICATION DISCUSSION

Planning History

The Site

3.1 The most pertinent planning history of note at the Site is presented below in Table 1.

Ref.	Description of Development	Decision/Decision Date
PL/16/1206 (LBC):	Internal and external alterations associated with change of use of 187-189 Kings Rd from office (Class B1) to 26 student units (Sui Generis) and associated works.	Refused 10 November 2016
PL/16/1205 (FUL):	Change of use of 187-189 Kings Rd from office (Class B1) to 26 student units (Sui Generis); Erection of 5-storey building to rear of 187-189 to create 35 student units (involving the reduction from 20 to 1 on- site parking space); Erection of single storey roof extension and 2-storey front extension at 191 Kings Rd to increase number of student units from 72 to 89, along with associated external alterations and landscaping (total increase of 78 student units from 72 to 150).	Refused 10 November 2016
950327	Internal alterations to listed building (removal of plinth, removal of partition and erection of new partition).	Granted Listed Building Consent 21/9/95.
930757	Internal demountable partitioning; lower ceiling on ground floor; change existing windows to third floor; front elevation with UPVC to match existing. Granted Listed Building Consent 25/6/93.	Granted Listed Building Consent 25/6/93

Neighbouring Sites

Address	Ref.	Description of Development	Decision/Decision Date
191 Kings Road	121639	Erection of additional 5th floor level to create 16 student bedrooms	Granted following completion of a legal agreement 7/03/13

191 Kings Road	030017	Development of 10 flats for use as student residential accommodation as part of Reading College and School of Arts and Design campus	Granted following completion of a legal agreement 3/06/03
185 Kings Road	79/TP/766	New office building on site of 185 Kings Road, Reading, together with a new access road taken from Kings Road and car parking area to rear	Granted 14/08/1980

Pre-application Discussion

- 3.2 The appointed professional team have successfully developed the scheme in order to sensitively redevelop the Site for use as student accommodation through positive pre-application engagement with RBC. A pre-application meeting was held with the Council's Planning Case Officer and the Conservation Officer on Wednesday 23 July 2025.
- 3.3 A written response (under ref. PL/25/0742) was issued on 1 September 2025 and is contained within Appendix A. The Applicant subsequently made several design amendments in response to the feedback that has been provided by Officers.
- 3.4 The Council confirmed that the principle of student accommodation at 187 - 189 Kings Road aligns with the site allocation (CR14I), subject to detailed consideration of heritage, amenity, environmental and policy matters. The following section summarises the key issues raised and explains how these have been addressed through the submitted scheme.

Principle of Development

- 3.5 Officers confirmed that the allocation supports change of use from office to student accommodation, subject to compliance with Policy H12 (Student Accommodation) and demonstration that the loss of employment floorspace satisfies Policy EM3 (Loss of Employment Land). The proposed student accommodation is located within Central Reading and in close proximity to Reading College which is consistent with the aims of Policy H12.
- 3.6 This Planning Statement provides supporting evidence addressing the lawful office use and demonstrating compliance with Policy EM3.
- 3.7 The feedback also confirmed that the proposed development falls below the 1,000sqm threshold for major development; the application is therefore minor development.

Heritage, Listed Building and Conservation Area

- 3.8 Given the Grade II listed status of the building and its location within the Eldon Square Conservation Area, officers emphasised the need for a comprehensive heritage-led approach. Key matters raised included:

- (a) Full assessment of significance and justification of all works;
- (b) Clarification of previous structural interventions (including steel framing);
- (c) Detailed information relating to the proposed lightwell works;
- (d) Sensitive treatment of external alterations, including the treatment of the former entrance to No. 187; and
- (e) Enhancement of the setting of the listed building and conservation area, particularly in relation to rear parking and frontage improvements.

3.9 This application is supported by a detailed Heritage Statement, condition survey and schedule of works to respond to the above concerns. Structural information has been prepared by a suitably qualified engineer, and detailed existing and proposed drawings have been provided.

3.10 The scheme has been carefully designed to:

- (a) Preserve the remaining historic fabric;
- (b) Reinstatement symmetry to the principal elevation through a sympathetic treatment of the former entrance; and
- (c) Enhancing the setting of the listed building and Conservation Area through removing the visually harmful rear parking areas and introduce a landscaped communal garden.

3.11 Overall, the proposal secures the long-term viable use of the listed building while preserving and enhancing its significance, consistent with Policies EN1, EN3 and EN6.

Residential Amenity

3.12 Officers raised specific concerns in relation to:

- (a) Outlook from third-floor south-facing rooms due to proximity of the parapet;
- (b) Daylight/sunlight levels to north-facing and basement units;
- (c) Open space provision; and
- (d) Noise and air quality impacts.

3.13 A full Daylight and Sunlight Assessment accompanies the application. The Daylight and Sunlight Assessment demonstrates that the majority of rooms meet BRE guidance, particularly across the upper floors where strong levels of daylight are achieved.

3.14 It is acknowledged that some lower ground rooms do not fully meet BRE targets. However, this reflects the inherent constraints of converting a Grade II listed building, where opportunities to enlarge openings or significantly alter the building fabric are limited. This shortfall is mitigated through the provision of communal space which the students will have access to and these areas meeting the necessary daylighting requirements.

- 3.15 The design has been refined to optimise performance by adapting internal layouts. In this context, the scheme should be assessed holistically, with lower ground constraints balanced by strong performance elsewhere and the delivery of otherwise high-quality accommodation in a sustainable location.
- 3.16 The scheme provides a high-quality rear communal garden, addressing the identified shortfall in open space and responding positively to the Conservation Area Appraisal's identification of rear garden loss as a negative feature.
- 3.17 Noise and Air Quality Assessments have been prepared in accordance with relevant standards, demonstrating that the site is suitable for residential occupation subject to appropriate mitigation. Details of ventilation strategy and MVHR systems are also provided.

Sustainability

- 3.18 The Council advised that the development must achieve a minimum BREEAM 'Very Good' rating. A BREEAM pre-assessment is submitted confirming that the development can achieve this standard.
- 3.19 The Energy and Sustainability Statement demonstrates compliance with Policies CC2 and CC3, incorporating low-carbon technologies and measures to mitigate overheating and reduce energy demand.

Transport, Cycle Parking and Servicing

- 3.20 Officers indicated that a car-free development would be acceptable given the highly sustainable location. Any car parking retained would need to be justified against parking standards.
- 3.21 Cycle parking provision accords with adopted standards, and detailed layout drawings demonstrate compliance with spacing and accessibility requirements.
- 3.22 A Travel Plan accompanies the application to manage peak arrival and departure periods. Servicing and refuse collection arrangements are provided from the rear of the site, avoiding impacts on Kings Road.

Biodiversity, Trees and Environmental Matters

- 3.23 The Council requested submission of tree, ecological and contaminated land information. The application is supported by:
 - (a) Tree Survey, Arboricultural Impact Assessment and Method Statement;
 - (b) Ecological assessment and biodiversity enhancements; and
 - (c) Preliminary Contaminated Land Risk Assessment.
- 3.24 The TPO-protected Oriental Plane tree is retained and safeguarded. This TPO tree is located outside of the red line boundary. Additional landscaping and biodiversity measures are incorporated within the scheme.

Planning Obligations and CIL

- 3.25 Officers confirmed that a Section 106 Agreement will be required to secure the student accommodation use in perpetuity. The Applicant is progressing this alongside the application.

- 3.26 The development will be liable for Community Infrastructure Levy (CIL), and appropriate documentation has been provided.

Conclusion on Pre-Application Engagement

- 3.27 The Applicant has engaged constructively with Reading Borough Council throughout the pre-application process.

Response to Previous Refusal (Refs: 161205/FUL & 161206/LBC)

- 3.28 The application site was previously subject to refusal in 2016 for a comprehensive redevelopment scheme. The reasons for refusal related primarily to:

- (i) harm to the setting of designated heritage assets, particularly arising from the scale, massing and proximity of a rear pavilion building;
- (ii) substandard living conditions resulting from overdevelopment, including poor outlook, overlooking and overbearing relationships; and
- (iii) design impacts on the character and appearance of the Eldon Square Conservation Area.

- 3.29 The current application has been fundamentally informed by these reasons for refusal and has been substantially redesigned to directly address each concern.

1. Heritage Impact and Setting of the Listed Building

- 3.30 The previous scheme was refused in part due to the scale, massing and proximity of the proposed rear pavilion building, which was considered to dominate and erode the setting of the Grade II listed building.

- 3.31 The current proposals respond directly to this concern through:

- The retention of the open rear setting, preserving the spatial relationship between the listed building and its historic garden context;
- A design approach focused on repair, restoration and sensitive alteration, rather than intensification of the site; and
- The retention and enhancement of key heritage features, including boundary treatments and introducing materials that are sympathetic and appropriate to their context.

- 3.32 As a result, the proposals avoid the primary source of harm identified in the 2016 refusal. Any previous concerns regarding heritage harm have been addressed, and the current scheme results in no harm.

2. Character and Appearance of the Conservation Area

- 3.33 The refused scheme was also considered to erode the prevailing character of the conservation area through overdevelopment of the rear and loss of openness.

- 3.34 The revised scheme addresses this by:

- Maintaining the open rear character of the site, consistent with the established pattern of long rear gardens identified within the Conservation Area Appraisal;
- Withdrawing the previously proposed additional built form that would have disrupted key spatial characteristics from the proposal;
- Introducing high-quality landscaping to replace the existing hardstanding, thereby enhancing the setting of the listed building;
- Creating a new viable use for the Listed Building which will see it brought back into occupation; and
- Ensuring all external works are subordinate and sympathetic in design and materiality.

3.35 The proposals therefore preserve, and in key respects enhance, the character and appearance of the Eldon Square Conservation Area.

3. Residential Amenity and Living Conditions

3.36 A key reason for refusal related to the poor standard of accommodation created by the proximity of buildings, resulting in overlooking, lack of privacy and poor outlook.

3.37 The current scheme has been fundamentally reconfigured to address these concerns, including:

- The removal of the rear pavilion building from the proposal, which was the principal source of harmful inter-relationships;
- A layout that avoids direct overlooking between habitable rooms;
- Improved internal arrangements to ensure adequate outlook, light and spatial quality for all units;
- The introduction of a meaningful rear communal garden, improving amenity provision.

3.38 These changes represent a substantial improvement over the refused scheme and ensure compliance with Policy DM4, delivering an appropriate standard of accommodation for future occupants.

4. Design Approach and Relationship with No. 191

3.39 The previous proposal included extensions to No. 191 which were considered to compete with the listed building and harm the streetscene.

3.40 The current application does not include comparable interventions and instead focuses on the sensitive reuse of the listed building itself, ensuring that:

- The visual primacy of the listed building along Kings Road is preserved;
- No inappropriate forward projection or competing built form is introduced;
- The overall composition of the streetscene remains unchanged or is enhanced.

5. Overall Response

3.41 In summary, the current application represents a clear and direct response to the reasons for refusal of the 2016 scheme. The proposals have been fundamentally revised to:

- Remove the elements of development that gave rise to heritage harm;
- Eliminate the overdevelopment that resulted in poor living conditions;
- Preserve the established character and spatial qualities of the conservation area.

3.42 The resulting scheme is materially different from the refused proposal and overcomes the previous concerns, delivering a policy-compliant form of development that accords with the development plan when read as a whole.

3.43 The submitted scheme has been informed directly by the issues raised and seeks to:

- (a) Secure the optimal viable use of a vacant Grade II listed building;
- (b) Preserve and enhance the character and appearance of the Conservation Area;
- (c) Deliver high-quality student accommodation in a sustainable town centre location; and
- (d) Address all technical, environmental and policy requirements identified by Officers.

4.0 THE PROPOSED DEVELOPMENT

- 4.1 The application seeks full planning permission and listed building consent for:-

“Change of use and conversion of the existing vacant Grade II listed building at 187-189 Kings Road from office use (Class E) to student accommodation (sui generis), together with associated internal and external alterations, landscaping, cycle and refuse storage, and all ancillary works (herein referred to as the ‘Proposed Development’)”.

- 4.2 The Design and Access Statement (DAS) describes the proposals in detail. This section provides a high-level summary of the Proposed Development.

Overview

- 4.3 The Proposed Development comprises the sensitive conversion and reuse of a vacant Grade II listed building to provide purpose-built student accommodation in a highly sustainable central Reading location. The scheme has been designed to secure the long-term viable use of the building, which has been vacant for a prolonged period, and to respond to the opportunity to optimise the use of previously developed land.
- 4.4 The proposals adopt a conservation-led approach, ensuring that the historic significance of the building is preserved and enhanced where possible. The scheme responds directly to the site’s constraints and opportunities, including its heritage designation, town centre location and existing built form.
- 4.5 The development incorporates associated landscaping, cycle parking, servicing arrangements and ancillary facilities necessary to support the residential use, while ensuring that impacts on the surrounding area are minimised.

Heritage

- 4.6 The application site comprises a Grade II listed building located within the Eldon Square Conservation Area. The statutory duties under Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 therefore apply, requiring special regard to be given to the desirability of preserving the listed building and its setting, and to preserving or enhancing the character and appearance of the conservation area.
- 4.7 The Proposed Development has been informed by a detailed Heritage Assessment which considers the significance of the building and the impact of the proposals. The assessment identifies that the principal significance of the listed building derives from its Bath stone principal elevation, its group value as part of a wider terrace of early 19th century buildings, and a limited number of surviving internal features, most notably the staircases.
- 4.8 It is also recognised that the building has undergone substantial internal alteration, with the interior largely rebuilt and of limited heritage significance. This allows for a degree of flexibility in accommodating a viable new use, provided that elements of higher significance are preserved.

- 4.9 The Proposed Development adopts a conservation-led approach, retaining all elements of high significance, including the principal façade, key architectural detailing and surviving historic features, while focusing change within areas of low or negligible significance. External alterations are limited and carefully designed, including the replacement of unsympathetic features with more appropriate traditional details and the use of conservation-style rooflights which will not be visible in key views.
- 4.10 The Heritage Assessment concludes that the proposals will result in no harm to the significance of the Grade II listed building. Furthermore, the development will better reveal the building's significance through the removal of modern interventions, repair of historic fabric, and reinstatement of a more appropriate pattern of use.
- 4.11 In respect of the Eldon Square Conservation Area, the site currently detracts from its significance due to its vacant and underutilised condition. The Proposed Development will bring the building back into active use and deliver enhancements to its appearance and setting, thereby preserving and enhancing the character and appearance of the conservation area.
- 4.12 The proposals will also enhance the setting of adjacent listed buildings by improving the condition and appearance of the site and removing elements that detract from the wider townscape.
- 4.13 Accordingly, the Proposed Development accords with Policies EN1, EN3 and EN6 of the Reading Borough Local Plan and with the requirements of the NPPF. The statutory duties under Sections 66 and 72 are fully satisfied.

Layout and Architecture

- 4.14 The layout retains the existing built form and footprint of the listed building, with no extensions or increase in floorspace proposed. The proposals therefore avoid the overdevelopment that characterised the previously refused scheme and instead focus on the reuse of the existing structure.
- 4.15 Internal reconfiguration allows for the subdivision of the building into student accommodation, carefully working within the constraints of the existing structure, floor levels and fenestration. The layout has been designed to ensure appropriate levels of daylight, outlook and residential quality for future occupants.
- 4.16 The architectural approach is conservation-led, focusing on the repair and reinstatement of original features, including the removal of unsympathetic modern interventions. Alterations are carefully designed to minimise impact on the historic fabric, with building services routed to avoid unnecessary harm and structural interventions limited to areas of modern construction where possible.
- 4.17 Overall, the proposals preserve the character and appearance of the listed building and its contribution to the Eldon Square Conservation Area.

Student Accommodation

- 4.18 The proposals will deliver 29 student rooms within the existing building.

- 4.19 The accommodation is supported by a range of ancillary facilities designed to meet the needs of future occupants, including communal study space at third floor level, laundry and storage facilities, and a ground floor management/office space.
- 4.20 The accommodation has been designed to provide a high-quality residential environment, with a layout that responds to the constraints of the existing building while ensuring appropriate levels of amenity, including daylight, outlook and internal circulation.
- 4.21 The provision of purpose-built student accommodation in this location will contribute to meeting identified demand and reduce pressure on the private rented sector.

Student Management

- 4.22 The Proposed Development will be owned and operated by the Bagri Foundation, which will retain full control over the management and operation of the building. This ensures a consistent and accountable management structure, with a long-term interest in maintaining high standards of operation and safeguarding the amenity of neighbouring occupiers.
- 4.23 The Bagri Foundation will be responsible for all aspects of the building's management, including tenant liaison, maintenance, security, and compliance with all relevant regulations.
- 4.24 The building will operate under a formal Student Management Plan, which can be secured by condition if required. This will set out detailed procedures for the management of the site, including:
- A 24-hour contact point for residents and local stakeholders;
 - Clear protocols for dealing with complaints, including noise and anti-social behaviour;
 - On-site or on-call management presence to respond to incidents;
 - Tenancy agreements incorporating strict behavioural clauses;
 - Induction procedures to inform residents of their responsibilities and expected standards of behaviour;
 - Regular monitoring and enforcement of management policies.
- 4.25 The nature of purpose-built student accommodation ensures a high level of control over occupants, with all residents subject to a single management regime. This differs from traditional Houses in Multiple Occupation (HMOs), where management is often fragmented. As such, the Proposed Development provides a more controlled and professionally managed form of accommodation.
- 4.26 The management strategy will also address arrival and departure periods, including arrangements for student move-in and move-out, to ensure that these are appropriately managed and do not give rise to disruption to neighbouring residents or the surrounding highway network.
- 4.27 Security measures will be incorporated into the operation of the building, including secure access controls, monitored entry points and appropriate surveillance, ensuring a safe and well-managed living environment for residents.

- 4.28 Refuse and recycling will be managed in accordance with an agreed strategy, including designated storage areas and regular collection arrangements, ensuring that waste does not accumulate and does not adversely affect the character of the area.
- 4.29 Overall, the Proposed Development will be subject to a comprehensive and proactive management regime, ensuring that the accommodation operates effectively and does not give rise to unacceptable impacts on the amenity of neighbouring occupiers. The proposals therefore accord with Policy H12 of the Reading Borough Local Plan and relevant guidance within the National Planning Policy Framework.

Landscape and Public Realm

- 4.30 The proposals include enhancements to the rear of the site through the rationalisation of the existing car park and the introduction of soft landscaping. This creates usable communal amenity space for residents while improving the setting of the listed building.
- 4.31 The approach reinstates a more appropriate relationship between the building and its curtilage, reflecting the historic pattern of development within the conservation area.
- 4.32 The scheme introduces additional planting and landscaping throughout the site, contributing to urban greening and improving visual amenity. These measures enhance the environmental quality of the site and contribute positively to the character and appearance of the surrounding area.

Ecology

- 4.33 The Proposed Development has been informed by a Preliminary Roost Assessment prepared by Arbtech. The report confirms that the site has low ecological value, with the existing building assessed as having negligible suitability for roosting bats and the site overall offering limited foraging and commuting habitat.
- 4.34 No evidence of bat roosting or nesting birds was identified, and the report concludes that no significant ecological constraints to development are present. The proposed works will not result in the loss of any important habitats, and no loss of foraging or commuting habitat is anticipated.
- 4.35 The development comprises a change of use of an existing building and is therefore not subject to the statutory Biodiversity Net Gain requirements.
- 4.36 Notwithstanding this, the scheme incorporates biodiversity enhancements, including the replacement of areas of hardstanding with amenity grass, the introduction of additional planting, and the installation of bat and bird boxes. A sensitive lighting strategy will also be implemented to minimise disturbance to wildlife.
- 4.37 Accordingly, the proposal avoids ecological harm and delivers a clear enhancement over the existing baseline, consistent with the objectives of Policy EN12 and national planning policy.

Trees

- 4.38 The Proposed Development is supported by a Tree Survey and Impact Assessment, which has informed the design and layout of the scheme in accordance with BS5837:2012.
- 4.39 The assessment confirms that the site is currently dominated by built form and hardstanding, with limited areas of soft landscaping. The proposals have been developed to retain all existing trees on and adjacent to the site, including those subject to Tree Preservation Orders, and to ensure that no harm arises to their health or longevity.
- 4.40 The report concludes that the development will result in no impact to retained trees, with all trees capable of being successfully retained throughout construction and beyond. Potential impacts are identified as de minimis and are appropriately managed through the implementation of standard tree protection measures, including root protection areas, protective fencing and site supervision.
- 4.41 The design has been carefully configured to avoid intrusion into root protection areas wherever possible. Where works are required in proximity to trees, these are limited in nature and can be undertaken using appropriate construction techniques to avoid harm.
- 4.42 In addition, the proposals introduce areas of soft landscaping within the existing car park, replacing sections of hardstanding and providing opportunities for urban greening and biodiversity enhancement.
- 4.43 Accordingly, the Proposed Development accords with the requirements of Policy EN12 of the Reading Borough Local Plan, relevant guidance within BS5837:2012, and the National Planning Policy Framework. There are no arboricultural constraints to the development.
- 4.44 Biodiversity Net Gain**
- 4.45 The Proposed Development comprises a conversion and change of use of an existing building and is therefore not subject to the statutory Biodiversity Net Gain requirements.
- 4.46 Notwithstanding this, the scheme incorporates biodiversity enhancements, including the replacement of areas of hardstanding with soft landscaping, the introduction of new planting, and the retention and protection of existing trees.
- 4.47 These measures will result in a clear improvement in ecological value compared to the existing baseline and are consistent with the objectives of Policy EN12 and national planning policy.

Transport and Servicing

- 4.48 The application is supported by a detailed Transport Statement which assesses the accessibility of the site, parking strategy, and likely transport impacts arising from the Proposed Development.
- 4.49 The site is located in a highly sustainable and accessible location on Kings Road, within close proximity to Reading Town Centre, Reading College and a wide range of day-to-day services and facilities. The Transport Statement confirms that the site benefits from strong walking and cycling connectivity and lies on a principal bus corridor with frequent services, as well as being within approximately 1.2km of Reading Station. This level of accessibility is consistent with a location where development should prioritise sustainable modes of transport in accordance with the NPPF.

- 4.50 In this context, the Proposed Development adopts a car-lite approach. The existing 31-space car park is rationalised and reduced to 16 spaces, reflecting the site's accessibility and policy requirements. This represents a significant reduction in car parking compared to the lawful office use and aligns with the Reading Borough Local Plan and Parking Standards SPD, which seek to restrict parking provision in highly accessible central locations.
- 4.51 The Proposed Development includes a rationalised and improved parking layout to the rear of the site. A total of 16 car parking spaces will be provided, including one accessible space, together with provision for electric vehicle charging. This represents a reduction from the existing parking provision and reflects the site's highly sustainable location.
- 4.52 The level of parking provision has been carefully considered and is appropriate having regard to the central location of the site, its excellent accessibility and the characteristics of the proposed student use. Parking will be actively managed through a permit system, ensuring that demand is controlled and that spaces are used only where necessary.
- 4.53 The development adopts a car-lite approach, reflecting the proximity of the site to Reading Station, frequent bus services, Reading College and the town centre. Future occupants are expected to rely primarily on sustainable modes of transport, with the Travel Plan specifically designed to encourage walking, cycling and public transport use.
- 4.54 Students will not be eligible for local on-street parking permits, ensuring that parking demand is contained within the site and does not place pressure on surrounding streets. This approach reinforces the car-lite nature of the development and aligns with local parking policy for central locations.
- 4.55 Servicing, refuse collection and vehicular access arrangements remain consistent with the existing situation, utilising the established rear access. The Transport Statement confirms that all servicing and vehicle movements can be accommodated safely within the site, including appropriate swept path provision.
- 4.56 In transport impact terms, the assessment demonstrates that the Proposed Development will generate very low levels of traffic. Daily vehicle movements are anticipated to be minimal, with negligible peak hour flows, and the scheme will result in a substantial reduction in car activity compared with the former use. As such, there will be no material impact on the operation or safety of the surrounding highway network. Cycle parking provision is prioritised and will comprise 16 long-stay secure spaces for residents, supported by additional visitor provision. These facilities will be covered, well-lit and monitored, and are designed to accommodate a range of cycle types, thereby encouraging sustainable travel behaviour and reducing reliance on the private car.
- 4.57 The Travel Plan sets out a comprehensive framework of measures to promote sustainable travel, including the provision of travel information to residents, ongoing monitoring of travel patterns, and the appointment of a Travel Plan Coordinator to oversee implementation and review. These measures will ensure that sustainable travel behaviour is embedded from first occupation and maintained over time.

- 4.58 Overall, the proposals prioritise sustainable modes of transport, provide safe and suitable access for all users, and will not result in any unacceptable highway or transport impacts. The scheme therefore accords with the relevant provisions of the NPPF, including paragraphs relating to sustainable transport and highway safety, as well as Policies TR1, TR3, TR4 and TR5 of the Reading Borough Local Plan.

5.0 PLANNING POLICY FRAMEWORK AND OVERVIEW

5.1 Legislative and Policy Framework

5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan therefore forms the primary basis for decision-making.

5.3 In addition, the Planning (Listed Buildings and Conservation Areas) Act 1990 places statutory duties on decision-makers. Section 66 requires special regard to be given to the desirability of preserving listed buildings and their setting, while Section 72 requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

5.4 National Planning Policy Framework

5.5 The National Planning Policy Framework (NPPF) is a key material consideration. It sets out the Government's objective of achieving sustainable development, which comprises economic, social and environmental objectives that are to be pursued in mutually supportive ways.

5.6 Relevant sections of the NPPF include:

- Section 2: Achieving sustainable development;
- Section 6: Building a strong, competitive economy;
- Section 8: Promoting healthy and safe communities;
- Section 9: Promoting sustainable transport;
- Section 11: Making effective use of land;
- Section 12: Achieving well-designed and beautiful places;
- Section 16: Conserving and enhancing the historic environment.

5.7 Paragraph 202 is of particular relevance in this case. It requires that where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, that harm should be weighed against the public benefits of the proposal.

5.8 Development Plan

5.9 The Development Plan comprises the adopted Local Plan and relevant Development Management policies. These policies collectively seek to:

- Direct development to sustainable locations;
- Promote the efficient use of previously developed land;
- Secure high standards of design;

- Protect residential amenity;
- Conserve and enhance heritage assets;
- Support economic growth and appropriate forms of residential development.

5.10 Key policies relevant to the proposals include those relating to design quality, heritage protection, residential amenity and sustainable transport.

- When read as a whole, the Development Plan supports development that optimises the use of urban land, delivers high-quality accommodation and secures the long-term conservation of heritage assets, provided any harm is appropriately justified and outweighed by public benefits.

Statutory Development Plan

5.11 The Site is located within the administrative boundary of Reading Borough Council ('RBC'). Relevant statutory development plan documents at the time of submission, for the purposes of Section 38 (6) above, comprise of:

- (a) Reading Borough Local Plan.

Other Key Policy Guidance Documents

5.12 RBC has also published several Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPDs) which provide further information on the implementation of adopted policies:

- (b) Revised Parking Standards and Design (2011)
- (c) Residential Conversions (2013)
- (d) Sustainable Design and Construction (2019)
- (e) Planning Obligations under Section 106 (2015)

Local Plan Partial Update

- 5.13 RBC is progressing a Partial Update to the adopted Local Plan, which will guide development in the Borough to 2041. The Local Plan Partial Update and accompanying Proposals Map were formally submitted to the Secretary of State on 9 May 2025, commencing the public examination process.
- 5.14 Stage 1 hearing sessions were held virtually on 11 and 12 November 2025, and Stage 2 hearings were subsequently held between 3-6 and 10-12 February 2026 at Reading Town Hall. A final remote hearing session is scheduled for 23 February 2026 to address specific matters arising during the examination process.

- 5.15 In accordance with paragraph 48 of the National Planning Policy Framework, the weight to be afforded to emerging policies is dependent upon the stage of preparation, the extent of unresolved objections, and the degree of consistency with national policy. Given that the Plan has now been submitted for examination and hearings have taken place, the emerging policies are capable of attracting material weight, although the extent of that weight will remain a matter of planning judgement until the Inspector's conclusions are published.
- 5.16 Notwithstanding the ongoing examination, the adopted Reading Borough Local Plan (2019) remains the statutory development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 and continues to be the primary basis for determination of this application.

Designations

- 5.17 The Site is subject to an allocation in the RBC Local Plan (CR14I). The allocation includes the following considerations for development:
- 5.18 Together with the allocation, the Site has the following designations:
- (a) It is adjacent to a historic site of contaminated land (garages at 191 Kings Road);
 - (b) The site is a Grade II Listed Building (listing entry: 1321921);
 - (c) Located within the Eldon Square Conservation Area;
 - (d) Within an Air Quality Management Area (AQMA);
 - (e) Identified as part of the Local Cycling and Walking Infrastructure Plan (LCWIP); and
 - (f) Flood Zone 1.

PLANNING POLICY ASSESSMENT

5.19 The purpose of this Section is to identify the key national, regional and local planning policy and provide and evaluation of the Proposed Development against this. An analysis of the key policies and tests is included in the relevant sections. Specialist guidance has also been considered in assessing the impacts of the Proposed Development through other supporting documents.

5.20 Planning Policy Assessment

(a) Principle of Development

5.21 The application site is located within Central Reading and is subject to a site-specific allocation under Policy CR14L of the Reading Borough Local Plan (2019), which identifies the site for:

“change of use of listed buildings from offices to residential or student accommodation.”

5.22 The Proposed Development therefore accords with the Development Plan in principle.

5.23 Policy CC1 confirms that:

“planning applications that accord with the policies in the development plan should be approved without delay.”

5.24 This reflects paragraph 11 of the NPPF, which requires a presumption in favour of sustainable development.

5.25 The proposal brings a vacant listed building back into active use within a highly sustainable location, consistent with Policy CC6, which states:

“the scale and density of development will be related to accessibility by walking, cycling and public transport.”

(b) Student Accommodation

5.26 Policy H12 states:

“new student accommodation will be provided on or adjacent to existing further or higher education campuses...”

5.27 The site is located within Central Reading, in close proximity to Reading College and well connected to the wider university cluster. It therefore represents a highly accessible and appropriate location.

5.28 This aligns with NPPF paragraph 60, which seeks to:

“significantly boost the supply of homes,”

5.29 This includes specialist accommodation such as student housing.

5.30 The proposal will reduce pressure on the private rented sector and is compliant with Policy H12.

(c) Design and Townscape

5.31 Policy CC7 requires development to:

“maintain and enhance the environment and the character of the area in which it is located.”

5.32 Policy EN6 requires development to be:

“sensitive to and informed by the historic environment.”

5.33 This aligns with NPPF paragraph 135, which requires development to be:

“sympathetic to local character and history.”

5.34 The internal layout has been informed by the existing structural frame, which must be retained to ensure the building’s stability. This limits the extent to which openings and layouts can be altered, and is a key factor in the design evolution of the scheme. The scheme removes the previously proposed rear overdevelopment of the site and introduces a more appropriate spatial arrangement, including enhanced landscaping. This results in a form of development that preserves the established character of the site.

5.35 The proposal therefore complies with Policies CC7 and EN6.

(d) Heritage

5.36 Policy EN1 states that:

“all proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings.”

5.37 It further requires that:

“any harm... should require clear and convincing justification.”

5.38 Policy EN3 supports proposals that:

“restore original building features, remove inappropriate additions and improve green spaces.”

5.39 At a national level, paragraph 199 of the NPPF requires that:

“great weight should be given to the asset’s conservation.”

5.40 The Proposed Development has been informed by a detailed Heritage Assessment and adopts a conservation-led approach. The scheme retains all elements of high significance, removes unsympathetic modern interventions, and introduces enhancements to the setting of the building, including a landscape-led approach to the rear.

5.41 The Heritage Assessment concludes that the proposals will result in no harm to the significance of the listed building. Furthermore, the development will better reveal its significance and enhance both the character and appearance of the Eldon Square Conservation Area and the setting of adjacent listed buildings.

5.42 As such, the proposal fully accords with Policies EN1 and EN3 of the Reading Borough Local Plan and with national policy, with no requirement for a balancing exercise under paragraph 202 of the NPPF.

(e) Daylight, Sunlight and Overshadowing

- 5.43 Policy CC8 requires that development provides acceptable living conditions for future occupants. This aligns with paragraph 135(f) of the NPPF, which requires a high standard of amenity.
- 5.44 The Proposed Development has been informed by a detailed daylight assessment, which has guided the evolution of the layout to optimise internal environmental quality within the constraints of the existing building.
- 5.45 The assessment demonstrates that the majority of rooms achieve good levels of daylight, particularly across the upper floors where compliance with BRE guidance is achieved and, in many cases, exceeded.
- 5.46 It is acknowledged that some lower ground floor rooms do not meet the BRE Spatial Daylight Autonomy targets. This reflects the inherent limitations of converting a Grade II listed building, where opportunities to enlarge openings, alter floor levels or significantly modify the building fabric are restricted.
- 5.47 The design has been refined to maximise daylight penetration where possible, including optimisation of lightwell dimensions and internal layouts. Notwithstanding these constraints, the assessment confirms that the performance of upper floor accommodation is strong and that, when considered as a whole, the scheme delivers an acceptable standard of daylight.
- 5.48 This approach is consistent with best practice for refurbishment schemes of this nature, where a degree of flexibility is applied in recognition of existing building constraints. On this basis, and taking a holistic view of the development, the proposals provide an appropriate standard of residential amenity in accordance with Policy CC8 and the National Planning Policy Framework.
- 5.49 It is acknowledged that some lower ground rooms do not fully meet BRE guideline targets. This reflects the inherent constraints of converting a Grade II listed building, where opportunities to enlarge openings, alter floor levels or significantly modify the external envelope are limited.
- 5.50 The design has been refined to optimise daylight performance, including improvements to lightwell provision and internal layout configuration. In this context, the scheme should be assessed holistically. The limited shortfalls at lower ground level are balanced by strong performance elsewhere, the provision of communal amenity space, and the overall quality of accommodation delivered.
- 5.51 On balance, and having regard to the constraints of the listed building, the proposal provides an acceptable standard of residential amenity and complies with Policy CC8.

(f) Transport

5.52 Policy TR1 requires development to:

“encourage walking, cycling and the use of public transport.”

5.53 This aligns with NPPF paragraph 110.

- 5.54 The site is highly accessible and the development adopts a car-free approach with cycle provision. Importantly, the Air Quality Assessment confirms that:

“the development is not anticipated to result in an increase in AADT flows of more than 1,000... [and] road traffic exhaust impacts were predicted to be negligible.”

- 5.55 This demonstrates that transport impacts are minimal and policy compliant.

(g) Noise and Vibration

- 5.56 Policy EN16 requires that development is not:

“damaging... through noise.”

- 5.57 This aligns with NPPF paragraph 187, which requires impacts to be mitigated.

- 5.58 The Noise Assessment (previously reviewed) confirms that acceptable internal noise levels can be achieved through mitigation measures, and that the site is suitable for residential use.

- 5.59 Accordingly, the proposal complies with Policies EN16 and EN17.

(h) Energy and Sustainability

- 5.60 Policy CC2 requires that residential conversions achieve a minimum BREEAM rating of ‘Very Good’, while Policy CC3 promotes sustainable design and climate resilience.

- 5.61 The Energy and Sustainability Statement demonstrates that the proposed development has been designed in accordance with the energy hierarchy set out in national and local policy. While the assessment indicates that full compliance with Part L 2021 is not achievable, this reflects the inherent constraints associated with the refurbishment of a Grade II Listed Building, including limitations on fabric upgrades, glazing replacement and the integration of renewable technologies.

- 5.62 Notwithstanding these constraints, the scheme delivers a substantial improvement in performance, achieving an overall 62% reduction in regulated carbon emissions compared to the existing building baseline. This represents a significant and meaningful reduction for a development of this nature.

- 5.63 The design has therefore maximised energy efficiency and carbon reduction as far as technically feasible, in accordance with Policy CC2 of the Reading Borough Local Plan. On this basis, the proposals are considered to accord with the objectives of sustainable design and construction when assessed in the context of a heritage-led refurbishment scheme.

- 5.64 The proposal therefore complies with Policies CC2 and CC3 and with national policy..

(i) Ecology and Biodiversity

- 5.65 Policy EN12 requires:

“no net loss of biodiversity and a net gain where possible.”

- 5.66 This aligns with NPPF paragraph 180.

5.67 The scheme introduces meaningful landscaping and greening of the rear of the site, replacing hardstanding with soft landscape. This represents a clear biodiversity enhancement.

5.68 The proposal therefore complies with Policies EN12 and EN14.

(j) Air Quality

5.69 Policy EN15 requires development to address air quality impacts. This aligns with paragraph 186 of the NPPF.

5.70 The Air Quality Assessment confirms that pollutant levels at the site are within acceptable limits and that future occupants will not be exposed to unacceptable conditions. The assessment also demonstrates that the development will result in negligible impacts and, due to reduced reliance on private vehicles, is expected to generate fewer trips than the previous office use with a 31 space car park.

5.71 The proposal therefore represents a betterment in air quality terms and complies with Policy EN15.

Overall Conclusion

5.72 The Proposed Development has been assessed against the Development Plan as a whole and the National Planning Policy Framework. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

5.73 The principle of development is clearly established through the site allocation under Policy CR14L, which supports the conversion of the listed building to residential or student accommodation. The proposal therefore accords with the Development Plan in principle.

5.74 In heritage terms, the proposals have been demonstrated to result in no harm to the significance of the Grade II listed building, while delivering enhancements to the character and appearance of the Eldon Square Conservation Area and the setting of nearby listed buildings. The development therefore fully complies with the statutory duties and relevant heritage policies, and substantial weight should be given to these benefits.

5.75 The Proposed Development will bring a vacant listed building, unused since 2014, back into viable and beneficial use. This represents a significant public benefit, securing the long-term conservation of a designated heritage asset in accordance with national policy.

5.76 The scheme also delivers 29 units of purpose-built student accommodation in a highly sustainable location, contributing to identified need and reducing pressure on the private rented sector. This carries significant weight in the planning balance.

5.77 The development has been designed to provide an acceptable standard of accommodation. While some lower ground rooms do not fully meet BRE daylight targets, this reflects the constraints of the listed building. When assessed holistically, the scheme delivers a good standard of amenity overall, with strong performance across upper floors and appropriate mitigation measures in place. On balance, the proposal complies with Policy CC8.

- 5.78 The development adopts a sustainable, car-lite approach and is located in an area of excellent accessibility. It will not give rise to unacceptable transport impacts and will support sustainable travel behaviour.
- 5.79 Technical assessments confirm that noise and air quality impacts are acceptable. In particular, the development is expected to result in negligible air quality impacts and a reduction in vehicle trips compared to the existing use, representing a betterment in environmental terms.
- 5.80 The scheme also delivers environmental enhancements, including urban greening and biodiversity improvements, notwithstanding that the development is not subject to mandatory Biodiversity Net Gain requirements.
- 5.81 Overall, the Proposed Development accords with the Development Plan when read as a whole. There are no adverse impacts that would significantly and demonstrably outweigh the benefits of the scheme.

6.0 CONCLUSION

- 6.1 The Proposed Development seeks full planning permission and listed building consent for the sensitive conversion and reuse of a vacant Grade II listed building at 187-189 Kings Road to provide purpose-built student accommodation, together with associated works.
- 6.2 The principle of development is firmly established through the Reading Borough Local Plan, with the site specifically allocated under Policy CR14L for residential or student accommodation use. The proposal therefore accords with the Development Plan in principle and represents an appropriate and sustainable form of development within Central Reading.
- 6.3 The scheme has been carefully developed in response to the site's constraints and opportunities, including its heritage designation, town centre location and previous planning history. In contrast to the refused scheme, the Proposed Development adopts a conservation-led approach, retaining the existing built form, removing unsympathetic alterations, and avoiding overdevelopment. The introduction of landscaping and improved spatial relationships enhances the setting of the listed building and contributes positively to the character and appearance of the Eldon Square Conservation Area.
- 6.4 In heritage terms, the proposals have been demonstrated to result in no harm to the significance of the Grade II listed building. The scheme retains all elements of high significance and directs change towards areas of lesser value, consistent with a conservation-led approach. Furthermore, the development will better reveal the building's significance and enhance both the character and appearance of the conservation area and the setting of nearby listed buildings. The statutory duties under Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 are therefore fully satisfied, and the proposal accords with the relevant provisions of the National Planning Policy Framework.
- 6.5 The Proposed Development delivers a range of clear and substantial public benefits. These include the restoration and viable reuse of a vacant listed building, which has been unoccupied for a prolonged period, the enhancement of its setting, and the removal of unsympathetic features. The scheme will also provide 29 units of purpose-built student accommodation in a highly sustainable location, reducing pressure on the private rented sector and contributing positively to the vitality of the local economy.
- 6.6 The Proposed Development provides a high standard of accommodation for future occupants. The layout has been demonstrably improved in response to the previous refusal, with the removal of harmful spatial relationships and the provision of meaningful communal amenity space. Technical evidence confirms that acceptable levels of daylight, outlook, noise and air quality can be achieved.
- 6.7 It is also notable that Environmental Protection officers previously raised no objection to the development on noise grounds, confirming that impacts would be acceptable subject to standard planning conditions. This establishes that noise does not represent a constraint to development. Furthermore, it demonstrates that the site is suitable for residential use and that any impacts can be fully mitigated through standard conditions.

- 6.8 The site is highly accessible and the development adopts a sustainable, car-lite approach, supported by appropriate cycle parking and a rationalised level of on-site car parking to meet operational needs. The transport strategy ensures safe and efficient access and servicing arrangements without adverse impact on the highway network.
- 6.9 The scheme also delivers clear environmental benefits, including enhanced landscaping and urban greening. These measures represent a substantial improvement over the existing condition of the site and contribute to wider sustainability objectives.
- 6.10 When assessed against the Development Plan as a whole, the Proposed Development accords with its key objectives relating to sustainable development, heritage conservation, design quality, residential amenity and environmental performance. There are no material considerations which indicate that planning permission should be withheld.
- 6.11 In the event that any limited conflict with specific policies is identified, it is clear that such conflict would be minor and would not outweigh the substantial benefits of the scheme. The development should therefore be approved when the Development Plan is read as a whole.
- 6.12 Furthermore, when assessed against the National Planning Policy Framework, the proposal constitutes sustainable development. There are no adverse impacts that would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework taken as a whole.
- 6.13 Overall, the Proposed Development represents a clear improvement over the previously refused scheme and provides a policy-compliant, sustainable and deliverable form of development. It secures the long-term future of a designated heritage asset, delivers important housing benefits, and results in a high-quality form of development appropriate to its context.
- 6.14 For all of these reasons, it is respectfully concluded that planning permission and listed building consent should be granted without delay.



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