



Retail Statement

138 – 144 Friar Street, Reading

National Pub Portfolio Ltd

July 2026

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Report title: Retail Statement

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Status: Final

Draft date: 29 July 2026

For and on behalf of Avison Young (UK) Limited

1. Introduction

1.1 This Retail Statement has been prepared to support the redevelopment of 138 – 144 Friar Street (the Site). This Statement focusses on the ground floor uses of the individual buildings in relation to the prevailing planning policy and should be read in conjunction with the other documents that comprise the planning application.

1.2 The proposed description of development is:

“Demolition of No’s 138-141 & 142-143 Friar St, partial demolition of No. 144 Friar St and erection of a basement and 6-storey building to provide co-living residential accommodation (purpose-built shared living accommodation – Sui Generis use class) and partial retention of the former Bugle Public House as a standalone Class E commercial unit”

1.3 This Retail Statement will address:

- The existing mix of uses on Friar Street;
- The role of Friar Street within Reading as a whole; and
- The suitability of the proposed ground floor uses in terms of the adopted and emerging Local Plan and the Reading Commercial Development Needs Assessment (January 2025).

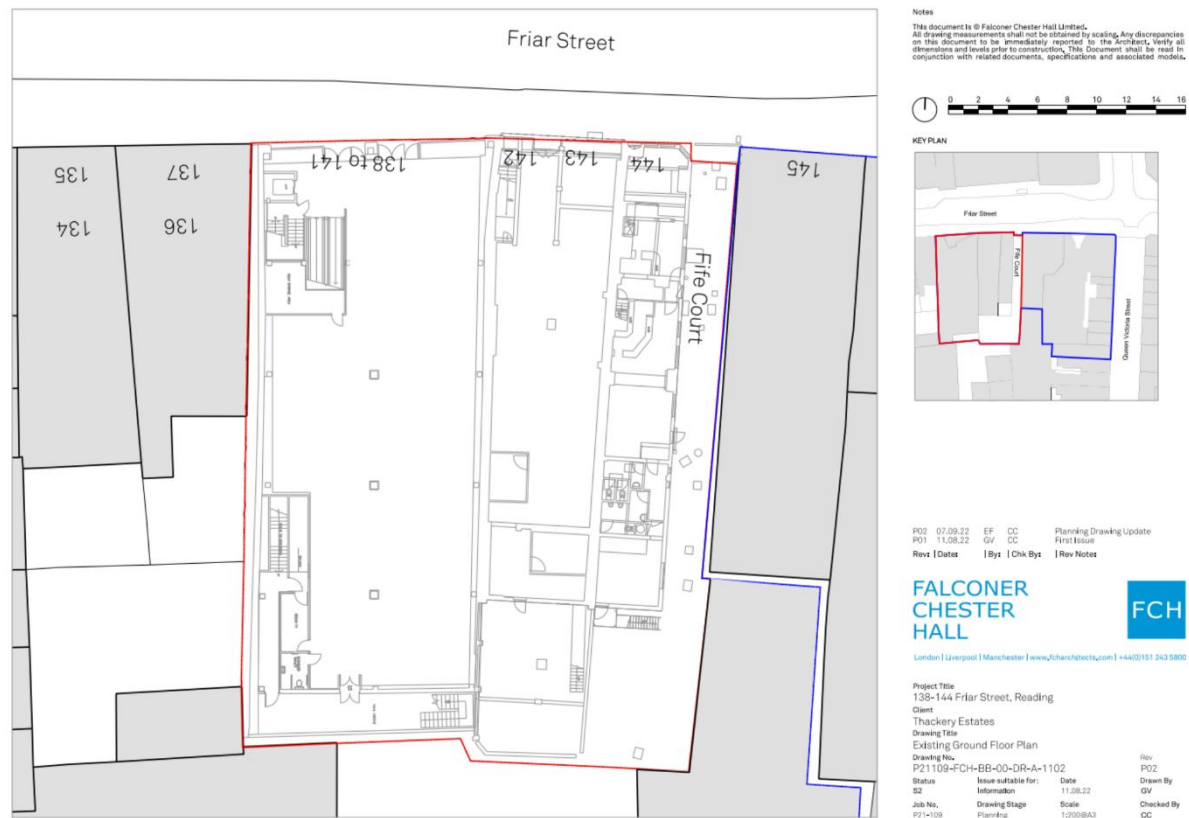
1.4 This Statement is structured as follows:

- **Section 2:** Describes the existing ground floor uses.
- **Section 3:** Describes the proposed ground floor uses.
- **Section 4:** Considers the relevant planning policy and material considerations.
- **Section 5:** Assesses the proposed development against the relevant planning policy.
- **Section 6:** Provides a conclusion.

2. Existing Uses

- 2.1 A full description of the Site and Surrounding Area is included within the Planning Statement submitted in support of the application.
- 2.2 As set out in Section 1 this Retail Statement focuses on the ground floor uses. The existing ground floor configuration is set out in **Figure 2.1**.

Figure 2.1: Existing Site Layout



Source: Falconer Chester Hall

- 2.3 The frontage of the existing buildings along Friar Street extends to circa 30 m (Goad). The buildings then extend back into the site providing back-of-house / ancillary facilities to the main use of the Site.
- 2.4 **Table 2.1** (below) provides a summary of the existing units, and their ground floor area. Other than the former Bugle Public House the other units are being occupied on a short term basis pending redevelopment.

Table 2.1: Existing Ground Floor Uses

Unit	Tenant	Unit Size sq m
144	Vacant Formerly The Bugle Public House, this unit has been vacant since 2021 (sui generis)	124
142 - 143	Fone Store (occupation since October 2025) Formerly C Mart Oriental Store who have subsequently relocated, EyeSite were the tenant before this.	223
138 - 141	Cancer Research UK Charity shop (occupation since May 2026)	541

Unit	Tenant	Unit Size <i>sq m</i>
	Formerly Revolucion du Cuba, which closed earlier this year after The Revel Collective went into administration (sui generis)	

3. The Proposed Use (Ground Floor)

- 3.1 This Statement focuses on the ground floor uses associated with the co-living accommodation and the reuse of the former Bugle Public House and should be read in conjunction with the other documents that have been submitted to support this planning application.

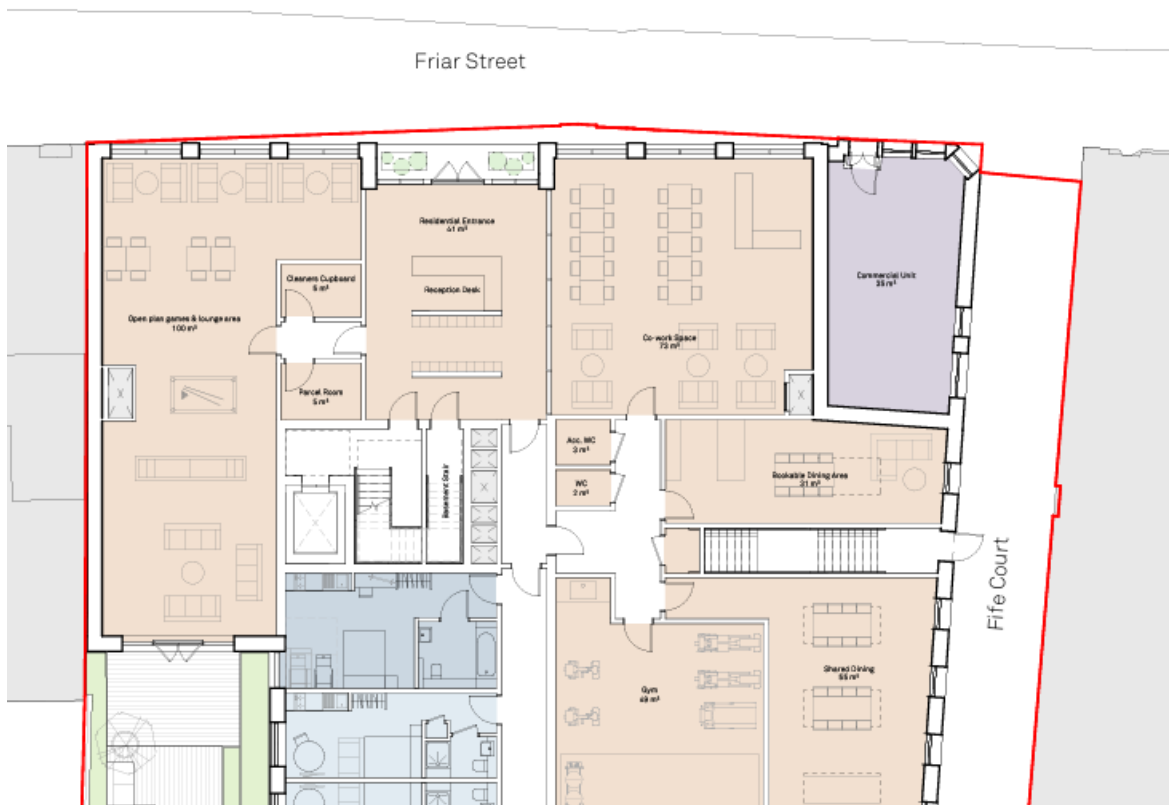
Bugle Public House

- 3.2 The former Bugle Public House is located on the corner of Friar Street and Fife Court. It is identified as a non-designated heritage asset which will be retained as part of the proposed development. To ensure that a tenant can be secured it is proposed that permission is granted for this to be used for the following range of uses:
- Class E(a): Retail
 - Class E(b): Restaurant / Cafe
 - Class E(c): Financial / Professional / Other Services
 - Class E(d): Indoor Sport
 - Class E(e): Medical or Health Services
- 3.3 As set out in Section 2 the building has been vacant since 2021 and therefore to ensure that the building is reoccupied a range of potential uses is sought.

Co-Living Ground Floor Space

- 3.4 The ground floor of the building will comprise the entrance and associated facilities for the co-living accommodation on the upper floors. A generous entrance is provided, this is a more significant entrance than has traditionally been associated with residential accommodation on the upper floors and ensure that there is a proper entrance to the accommodation.
- 3.5 Amenity and ancillary facilities for the residents will also be providing including co-working spaces, gym, shared games and lounge areas and bookable private dining. To the rear of the ground floor a refuse area will be provided along with co-living studios. **Figure 3.1** comprises an extract from the proposed ground floor plan which identifies the uses that will be located immediately adjacent to Friar Street.
- 3.6 The residents co-working space and open plan games and lounge area has been located adjacent to Friar Street. These are the elements that will be most active during the day / evening. The resident's co-working space will provide space for residents to work within the building and will create activity during the day. The open plan games and lounge area will create interest throughout the day and in to the evening.
- 3.7 The entrance and associated amenity facilities will create activity and interest along Friar Street. In addition this will be the main residential access for 145 co-living units which will create movement of people throughout the day / night.
- 3.8 The ground floor will provide the amenity spaces required as part of a co-living scheme and enable those who live in the development to have a clear entrance. The concept of co-living requires that additional amenity spaces are provided for residents. The provision of communal spaces along Friar Street enables the residents to benefit from the natural light and be part of the community. From a place making perspective interest will be created along this façade.

Figure 3.1: Proposed Ground Floor Plan



Source: Falconer Chester Hall

3.9 **Figure 3.2** sets out details of the proposed elevations along Friar Street, this shows the central entrance and the glazing to each side. Glazing is proposed to each side of the main entrance to provide visual interest.

Figure 3.2: Proposed Friar Street Elevation



Source: Falconer Chester Hall

4. Planning Policy

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) outlines that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Development Plan

Reading Local Plan (2019)

- 4.2 The Development Plan for Reading Borough Council comprises the Reading Local Plan (2019). The following policies from the Reading Local Plan (2019) are relevant when considering the existing and proposed ground floor uses:

- **Policy RL1** (Network and Hierarchy of Centres);
- **Policy RL6** (Protection of leisure facilities and public houses); and
- **Policy CR7** (Primary Frontages in Central Reading).

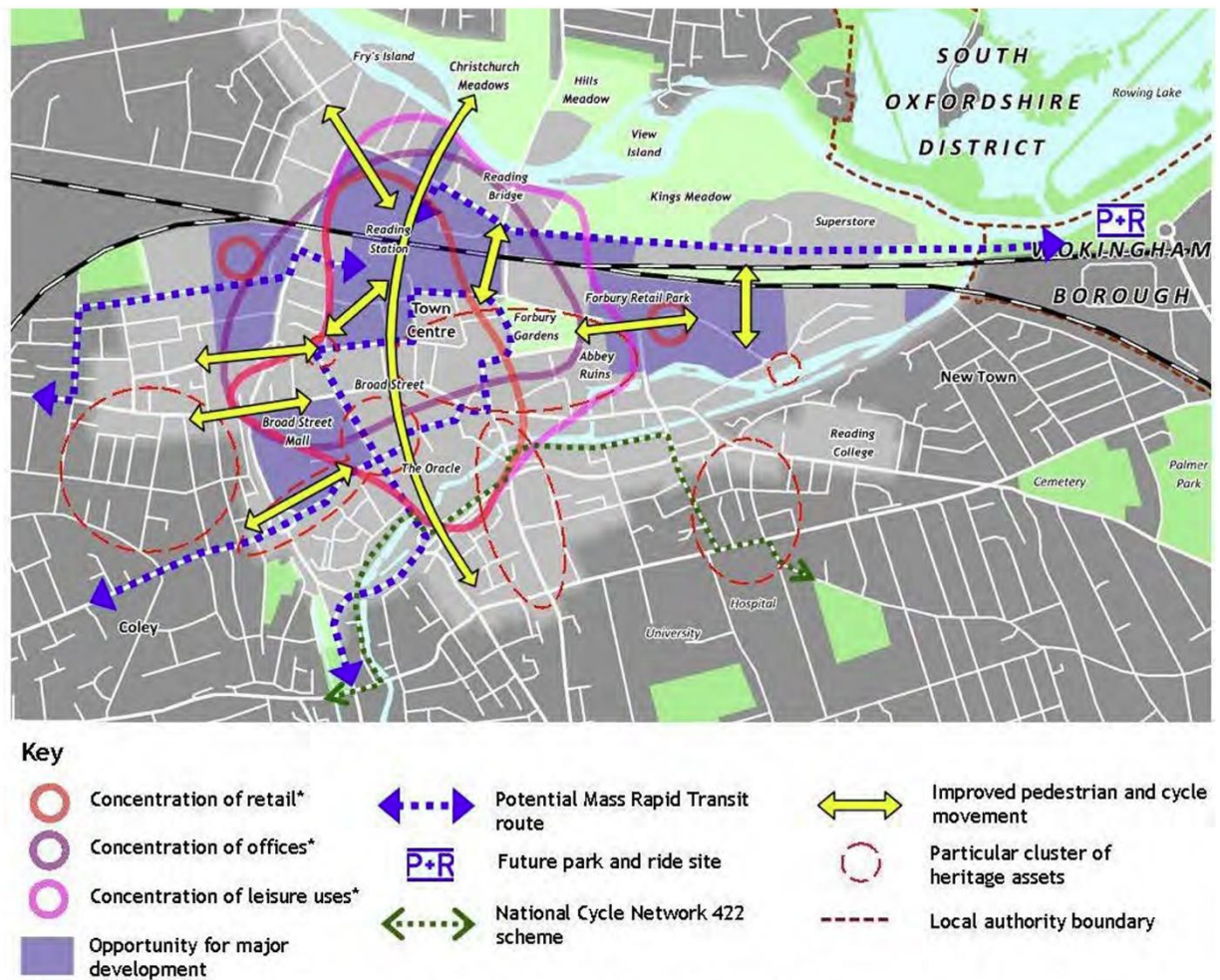
- 4.3 An extract from the Proposals Map is set out below, the site is located within the primary shopping area of Reading and also within the designated primary frontage in Central Reading (Policy CR7).

Figure 4.1: Proposals Map Extract



- 4.4 The following Area Strategy for Central Reading is set out, the Site is broadly within the location that is identified as being for a concentration of retail.

Figure 4.2: Area Strategy for Central Reading



* Location of concentrations are approximate only—please see definitions on Proposals Map

Source: Figure 5.1 Reading Local Plan 2019

- 4.5 **Policy RL1** (Network and Hierarchy of Centres) sets out that:

The vitality and viability of these centres should be maintained and enhanced. Some centres are based around a small area of green, and where this is an important part of the layout and function of the centre, it will be retained and where possible enhanced. The following improvements will be acceptable in all centres:

- Accessibility and transport improvements;
- Broadening range of facilities;
- Residential use of upper floors; and
- Environmental enhancements.

Central Reading will see the greatest levels of development and change. Development and change, including intensification of town centre uses, will also take place within smaller centres in line with the role of the centre in the network. The smaller centres which are expected to be the main focus for

intensification, change and additional community facilities will be The Meadway and Whitley District Centres.

4.6 Policy RL6 (Protection of leisure facilities and public houses) states that:

“Existing leisure facilities or public houses will generally be retained, and there is a strong presumption in favour of retaining leisure facilities or public houses where they are the only facility of their type in a district, major local or local centre. Developments that would result in the loss of a leisure facility or a public house will not be permitted unless it can be clearly demonstrated that:

a. There is no need for this type of facility in this area; or

b. The function of the facility can be adequately fulfilled by an existing facility, or a facility proposed as part of the development, where that facility would be at least as accessible to the same catchment; or

c. Unless the site is a sports or recreation facility, the impacts on amenity of residents or on crime and security of retaining the facility could not be dealt with through other measures, and would be so severe as to outweigh the benefits to the wider community of retaining the facility.”

4.7 Policy CR7 (Primary Frontages in Central Reading) states that:

“Uses on the ground floor along the designated primary frontages as shown on the Proposals Map will be within one of the following use classes: A1, A2, A3, A4, A5, C1, D1, D2 or related sui generis uses, unless it would be an entrance to upper floors. New developments (or alterations to existing uses) that front onto any of the designated primary frontages will provide an active building frontage with a display window or glazed frontage at ground floor level, in order to contribute to the vibrancy of the town centre, and provide visual interest.

Frontages should be of a high visual quality. Any frontages that have the potential to hinder movement or cause unnecessary safety risk will not be permitted.

Proposals that would result in the loss of A1 or A2 use such that the proportion of the length of frontage within the street in A1 or A2 use falls below 50% will not be permitted, unless the proposal introduces a use that makes a positive contribution to the overall diversity of the centre. 50% of new primary frontages as shown on the Proposals Map should be in A1/A2 use.”

Material Considerations

National Planning Policy Framework (December 2024)

4.8 Paragraph 7 of the NPPF emphasises that *“the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner.”* Paragraph 11 sets out that there is a presumption in favour of sustainable development.

4.9 Paragraph 90 states that *“planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.”*

Planning Practice Guidance

4.10 Paragraph 2b-001-20190722 identifies the role that Local Planning Authorities can play in supporting the management, adaptation and growth of town centres:

“For planning purposes, town centres as defined in the National Planning Policy Framework comprise a range of locations where main town centre uses are concentrated, including city and town centres, district and local centres (and so includes places that are often referred to as high streets). Local planning authorities can take a leading role in promoting a positive vision for these areas, bringing together stakeholders and supporting sustainable economic and employment growth. They need to consider structural changes in the economy, in particular changes in shopping and leisure patterns and formats, the impact these are likely to have on individual town centres, and how the planning tools available to them can support necessary adaptation and change.”

A wide range of complementary uses can, if suitably located, help to support the vitality of town centres, including residential, employment, office, commercial, leisure/entertainment, healthcare and educational development. The same is true of temporary activities such as ‘pop ups’, which will often benefit from permitted development rights. Residential development in particular can play an important role in ensuring the vitality of town centres, giving communities easier access to a range of services. Given their close proximity to transport networks and local shops and services, local authorities may wish to consider locating specialist housing for different groups including older people within town centres or edge of centre locations.” (Our emphasis)

Reading Commercial Development Needs Assessment, LSH (January 2025)

Retail and Leisure Trends Summary

4.11 The following summary is provided (paragraphs 60 – 62):

“Our towns, traditional high streets and shopping centres have been challenged for more than a decade by falling market demand, rising occupancy costs and increasing competition from online and out-of-centre shopping. Trends accelerated and compounded by the COVID-19 pandemic are resulting in an increase in vacant shop units, often in primary shopping areas, as retailers and occupiers either choose to downsize and/or close stores in some locations (or they are forced out of business altogether due to failing business models and unmanageable debts. As online spending has increased, the demand for physical retail demand has been impacted. Where there is vacant space there is a need for a strategic evaluation as to how town centres realign themselves.

Today, many of our traditional towns and shopping centres simply have too much retail space. The critical challenge over the short, medium and long term will be how to retain existing businesses, fill/replace the voids and attract new investment. The danger is that an increase in long-term vacancies in centres will lead to a ‘spiral of decline’, which will further engender feelings of neglect and lack of investment confidence in town centres, and “push” more people to shop online.

As town centres evolve, residential provision in centres is already being encouraged, including by previous national planning changes (such as office to residential conversions through prior approval, and permitted development for two flats above a shop. In those cases where retail vacancies are long-term and more often than not concentrated in secondary shopping streets/pitches, it will be necessary to plan for alternative uses and/or consider options for redevelopment. As a result of the increasing drive towards more flexible planning through changes to the Use Classes Order and Permitted Development Rights, there will inevitably be more mixed-uses within centres particularly residential, and this should be encouraged and planned for through enabling planning policies.

It will be important to maximise intergenerational residential provision in the most sustainable locations, particularly in centres, as part of a balanced mix of uses. Therefore, consideration needs to be given to planning policies and allocations enabling the growth of other uses, such as education, leisure and recreation, within centres, which, along with residential, are particularly positive in terms of enhancing the vitality of centres.” (emphasis added)

Reading Town Centre

4.12 The following Strengths, Weaknesses, Opportunities and Threats Analysis is included (paragraph 116).

Table 4.1: Reading SWOT Analysis

Strengths	Weaknesses
Strong comparison retail and leisure services provision. Strong food & beverage offer (particularly bars & wine bars and restaurants when comparing to the UK average). • Good presence of national multiples (particularly for comparison retail). Vue Cinema and supporting food & beverage operators at The Oracle Riverside act as strong leisure and entertainment hub. Hosier Street Market and Blue Collar Street Food Market. Strong potential demand from retail and leisure operators. Strong transport links with great connections to and from London. Good parking provision across the centre. A variety of arts, entertainment and food & beverage venues and establishments that contribute to a healthy evening economy. Strong sentiment from visitors (interviewed within the NEMS household survey) around the provision of cafes and restaurants in the centre.	Low retail services provision. High vacancy rates, particularly for floor space. Significant decline in prime rents in recent years. Footfall levels have failed to recover to pre-pandemic levels in several parts of the centre. Nothing' was the second most common answer to the question of what visitors like about the centre within the NEMS household survey (over 15% of respondents gave this answer).
Opportunities	Threats
Refurbishment and redevelopment plans for The Oracle Centre will help to reinvigorate investment in this part of the town centre. The repurposing of the two vacant department stores will help rationalise an oversupply of floorspace in the centre and stimulate new expenditure through new housing provision, which will also benefit businesses in the wider town centre. New uses brought in to address vacancies (education, residential, healthcare etc.). Address the large-scale vacancies (excluding those relating to The Oracle Centre), taking inspiration from the innovative repurposing of commercial premises elsewhere (examples include vacant floorspace at Merseyway Shopping Centre in Stockport being transformed into the Stockroom library, venue and community space, and the vacant former Toys R Us unit in Gloucester being tuned into a padel venue). Cheaper parking (as identified within the NEMS household survey). Capitalise on strong potential interest from retail and leisure operators for presence within the centre.	The potential loss of further high street brands leading to further vacancies. Declining comparison retail offer within the centre. High/increasing business operating costs. Potential uncertainty surrounding the relocation and downsizing of the Vue Cinema linked to the partial redevelopment of The Oracle Centre. It is crucial that proposals to relocate the site to another town centre site follow through. The growth in online shopping and its impact on brick-and-mortar retail outlets. The vacancy level and associated lack of activity negatively impacting on operators' perceptions and willingness to invest.

4.13 The Assessment recognises that increasing vacancies is a key issue for the centre which may indicate an over supply of retail floorspace, presenting an opportunity to repurpose vacant floorspace (paragraph 118). There is recognition at paragraph 119 that within the fringe areas of the Primary Shopping Area there may be a case to review the boundary to encourage alternative uses.

4.14 The footfall heat map from September 2024 is set out in **Figure 4.3** (below). This shows a concentration around Broad Street. The footfall around the application site is lower than the more central areas.

Figure 4.3: Reading Footfall Heat Map, September 2024



Source: Figure 9, Appendix C, Reading Commercial Development Needs Assessment (January 2025)

4.15 The Evening Footfall (5pm – 11pm) is set out in **Figure 4.4** (below).

Figure 4.4: Reading Footfall Heat Map, Evening (5pm – 11pm)



Source: Figure 18, Appendix C, Reading Commercial Development Needs Assessment (January 2025)

Policy Recommendations

4.16 Based on the fact that there is no policy requirement under the NPPF to define primary and / or secondary shopping frontages the recommendation is that the final paragraph of **Policy CR7** (Primary Frontages in Central Reading) is removed. This relates to the requirement to ensure that 50% of frontages within the primary shopping area should remain in A1 or A2 use (paragraphs 453 – 455).

4.17 The Assessment goes on to recognise that:

“This amendment is on the basis that the prescribed minimum frontage requirements for Class E cannot be enforced. However, the remaining policy text will help to achieve the Council’s objective to ensure active frontages within the Central Reading area.” (Paragraph 456)

4.18 It is clear that the adopted **Policy CR7** (Primary Retail Frontages in Central Reading), contains an element that is no longer enforceable which has been recognised in the Council’s own Evidence Base and Emerging Local Plan.

Local Plan Partial Update Submission Version (May 2025)

4.19 The Public Examination for the updated Local Plan has now been completed and the Council are awaiting the Inspectors Report, therefore weight should be attached to the policies within this Plan.

4.20 **Policy RL1** (Network and Hierarchy of Centres) has not changed from the adopted 2019 version of the Local Plan.

4.21 **Policy RL6** (Protection of Leisure Facilities and Public Houses) has not changed from the adopted 2019 version of the Local Plan.

4.22 **Policy CR7** (Primary Frontages in Central Reading) has been amended such that the final paragraph has been deleted and there is no longer a requirement to demonstrate that the proportion of the length of the frontage remains in A1 or A2 use.

“Uses on the ground floor along the designated primary frontages as shown on the Proposals Map will be within one of the following use classes: C1, E, F1, F2 or related sui generis uses, unless it would be an entrance to upper floors. New developments (or alterations to existing uses) that front onto any of the designated primary frontages will provide an active building frontage with a display window or glazed frontage at ground floor level, in order to contribute to the vibrancy of the town centre, and provide visual interest.

Frontages should be of a high visual quality. Any frontages that have the potential to hinder movement or cause unnecessary safety risk will not be permitted.”

4.23 The supporting text at paragraph 5.3.29 notes that:

“Active frontages at ground floor level are key in creating the impression of a healthy centre, and in ensuring that locations are places that people want to visit and spend time in. On the key streets in the centre, it is vital that new development continues to reflect this, and that it offers visual interest on the frontage. Ground floor uses on these frontages should be uses that create interest and activity, and typically complement town centre streets. Ensuring that uses contain frontage onto the street is essential in creating safe places and spaces, and making areas feel well-used.”

4.24 Paragraph 5.3.30 requires that primary frontages within the town centre are “occupied by those uses that make the greatest contribution to the vibrancy of the centre. These frontages will contain continuous

glazed display windows. In the exceptional cases where this is not achievable, entrances and openings should be positioned at regular intervals along the ground floor, to assist in enlivening the street."

- 4.25 **Policy H15** (Purpose Built Shared Living Accommodation) is a new policy that was not included within the 2019 Local Plan. The policy proposes criteria against which this type of development should be considered, this includes being located within the town centre (or a 15-minute walk). In addition high quality, and well placed on-site communal facilities are required to be provided including common work areas. The supporting text at paragraph 4.4.116 notes that *"high-quality communal accommodation is the only reason why smaller private living spaces are acceptable, and it is therefore critical to the appropriateness of a co-living proposal"*

Policy CR7 (Primary Retail Frontages in Central Reading)

- 4.26 As set out above, the emerging Local Plan informed by the Council's own Evidence Base is proposing a change to **Policy CR7** such that there will no longer be a requirement to demonstrate that 50% of the primary retail frontage should be in Use Class A1 or A2.
- 4.27 A review of decisions taken by Reading Borough Council indicates that this is a direction of travel that has been taken in decision making with regard to Policy CR7 and in addition how the communal amenity spaces to support co-living development have been considered

Table 4.2: Review of Application of Policy CR7 and Co-Living Schemes

Application	Committee Report Commentary	Date
PL/24/1501/FUL 20 – 30 Greyfriars Road Demolition of the existing building and erection of part 7, part 13 co-living building and associated facilities.	Paragraph 7.36 The ground floor of the development would be given over to communal uses. The chamfered entrance underneath the colonnaded porch entrance leads to a lobby with a café, post room, a large Co working space, residents' lounge, laundry, games room, gym with fitness studio, and an external courtyard. Paragraph 7.86 <u>No commercial use is proposed at the ground floor, nonetheless there is an active frontage proposed</u> , resulting from a redesign following pre-application advice, to ensure the ground floor internal spaces increase the active frontage and improve the access to the building along Greyfriars Road and Garrard Street. This space incorporates gym, fitness studio, co-working space and lounge for residents' use, as well as a main entrance lounge which includes a cafe and managed reception. The chamfered edge at the north-western corner of the building, which <u>now includes the main entrance, creates a more welcoming and generous arrival space</u> . This would accord with the principles of Policy CR2 and the RSAF.	2 April 2025
PL/22/0933 35 – 39 Friar Street Demolition of existing buildings and installation of basement and erection of part 7, part 11 storey mixed use building comprising 103 residential units and Class E at basement / ground	Paragraph 7.7 Policy CR7 (Primary Frontages in Central Reading) is also relevant, given Friar Street is a designated primary frontage. The policy states that proposals that result in the loss of A1 or A2 use such that the proportion along the whole frontage falls below 50% will not be permitted. <u>This policy however is now out of step with the national context</u> , following the September 2020 changes to the Use Classes Order, which revokes Class A1/A2 and introduced the 11 part Class E. The November 2023 consultation on the scope and content (under Regulation 18) of a Local Plan Partial Update <u>indicated that minimum proportion of any specific use is proposed to be removed</u> . Whilst this is not yet an adopted policy approach, <u>it indicates an anticipated direction of travel</u> . Set within this context, there are no concerns raised with the Class E(a)-(f) uses proposed. Furthermore, these uses align with the Policy CR7 equivalent uses permitted in	4 September 2024

Application	Committee Report Commentary	Date
	primary frontage locations within the regional centre such as this (which links into Policy RL1 (Network and Hierarchy of Centres)).	
PL/22/1235 138 – 144 Friar Street Demolition and erection of up to 7 storey hotel building with ancillary ground floor lounge, bar and restaurant.	Paragraph 6.3 The proposals also result in a loss of a Class E(a) retail use (formerly Class A1). The site is located within the wider Friar Street primary frontage, where under Policy CR7 proposals which involve the loss of Class A1 or A2 uses (now Class E(a) or E(c)) such that the proportion falls below 50% will not be permitted. <u>Based on an officer audit, the Class E(a) or E(c) percentage along Friar Street is already below 50%, at 42%.</u> However, given the proposal results in 3 units (1 Class E(a) and 2 non E(a) or E(b) becoming 1 non-E(a)-or-E(b) use, the loss is equalised out in reality. Accordingly, there is no reasonable basis to resist the loss of a Class E(a) use in this instance. Paragraph 6.4 Turning to the proposed hotel use, whilst there are no specific policies relating to hotels, <u>this use does generally align with the thrust of Policies RL1, RL2, CR1, CR4 and CR7. The use would attract a wide range of people into the centre (and support other centre uses) and is therefore broadly welcomed in land use terms.</u> A Class C1 use is compatible with those uses required at ground floor level along designated primary frontages such as this (see Policy CR7), with the submission also specifying that an ancillary lounge, bar and restaurant is proposed at ground floor level too. In principle, there is no issue with this, although a condition will ensure these facilities remain ancillary in nature	7 December 2022
PL/21/0223 1 – 15 Queen Victoria Street and 147 – 148 Friar Street	Paragraph 6.12 The development includes two units within the Friar Street 'Primary Frontage'. This frontage, as a whole, is already below the required level of provision of E (a) and E (c) uses required by Policy CR7 at <u>34%.</u> Therefore, occupation of these two units for sale of food and drink (Class E b) would result in further detriment to the retail character of the town centre and it is considered reasonable and necessary to secure that these two units are occupied in an E (a) shop use only by way of condition.	23 June 2021

Source: www.reading.gov.uk (our emphasis)

- 4.28 It is clear that the Council recognise adopted **Policy CR7** is out of step with the national context, and the wider range of uses that can provide an active frontage to support the town centre more widely.

5. Assessment of the Proposed Development

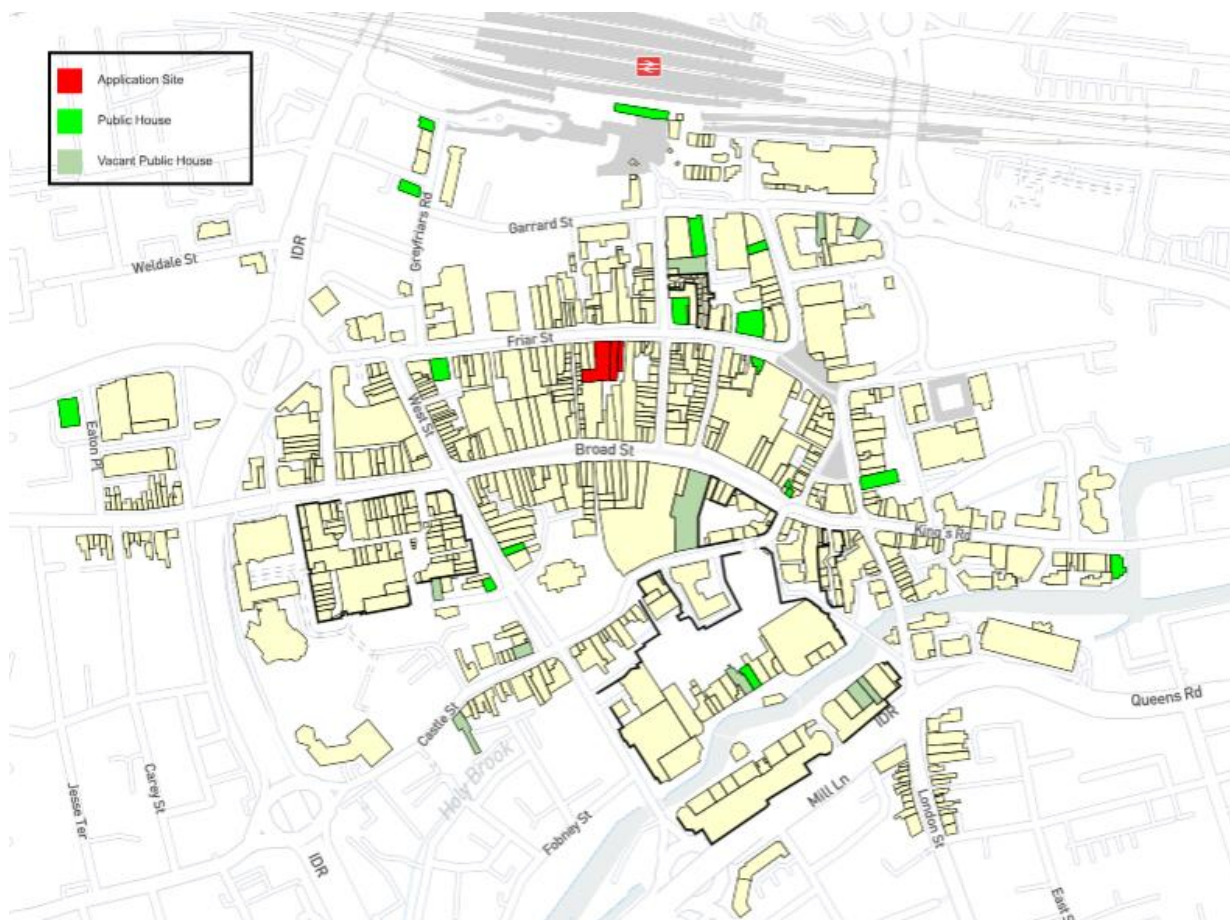
- 5.1 As set out in Section 2, the Site currently comprises 30m of frontage onto Friar Street. The former Bugle Public House is vacant and the remaining two units are being occupied on a short term basis pending redevelopment.

Loss of Leisure Facilities / Public House

The Bugle

- 5.2 It is noted that this building is being retained as part of the proposed development and will be repurposed for a new use to contribute to the wider area. This former pub has been vacant since 2021.
- 5.3 **Policy RL6** of the adopted and emerging Reading Local Plan states a general presumption in favour of the retention of public houses where they are the only facility of their type in a centre. This does not apply in this case. The policy goes on to set out criteria against which the loss of a public house will be permitted. It is noted that given the Site is centrally located within Reading town centre
- 5.4 **Figure 5.1** (below) comprises an extract from the Goad Plan for the centre of Reading. In addition to the application site, existing public houses and vacant public houses are identified. It is clear that there is a good existing level of provision of pubs within Reading. Noting that The Bugle has been vacant for circa five years.

Figure 5.1: Existing Public Houses



Source: Experian Goad

- 5.5 The Committee Report (7 December 2022) relating to the previous application to redevelop this Site (application reference 221235/FUL) in relation to the loss of the former pub noted that (paragraph 6.2):

“As a starting point from a purely land-use perspective, the proposal involves the loss of two Sui Generis uses (Revolución de Cuba bar and the former Bugle Public House – both formerly Class A4). Policy RL6 generally seeks the retention of such facilities, but provides instances where losses will be accepted. This includes where the function of the facility can be adequately fulfilled by an existing facility, or one proposed as part of the development. In this instance there are considered to be numerous other nearby facilities in Central Reading, while the proposals also incorporate an ancillary bar and restaurant too. Accordingly, the loss of the two existing uses is justified.”

- 5.6 There is a sufficient level of provision of pubs within the centre of Reading (and in addition there are further vacant pubs) such that there is sufficient supply of facilities should operators wish to enter the market. Overall, therefore it is considered that there is no ongoing need for the retention of The Bugle as a pub. It is noted that the building itself will be retained within the redevelopment scheme and an alternative commercial use is being sought in order to ensure the reuse of this non-designated heritage asset. The proposed development is therefore in accordance with **Policy RL6**.

Proposed Ground Floor Uses

- 5.7 It is noted that **Policy CR7** is being reviewed as part of the Local Plan Review. Given the advanced stage that the emerging Local Plan has reached the policies should be afforded significant weight. The proposed change to the policy is supported by the Council's up-to-date evidence base.
- 5.8 **Figure 5.2** below comprises an extract from the Goad Plan for Friars Street. The policy relates to the proportion of A1 or A2 uses “in the length of frontage within the street” it is not clear whether this should be measured along one side of the street / both or somewhere in between.

Figure 5.2: Goad Plan Extract



Source: Experian Goad

- 5.9 It can be seen from **Figure 5.2** that retail and service uses are no longer the prevalent uses on Friar Street with other uses being more common. This is a reflection of the changing face of the high street and Reading more generally. There are a number of developments and refurbishments taking place along Friar Street. The Council's Commercial Development Needs Assessment (January 2025) recognises the challenges that the high street has faced as retailers and occupiers consolidate their representation in towns concluding that *"where there is vacant space there is a need for a strategic evaluation as to how town centres realign themselves"* (paragraph 60).
- 5.10 The proposed co-living use and associated ground floor amenity spaces will attract new investment to Reading, to create an active frontage in this part of Reading. The development will also introduce residents into the centre of Reading who will use local retailers and services.
- 5.11 From **Figure 5.2** it is evident that Friar Street is not currently meeting the 50% set out in adopted **Policy CR7**. Where this criteria is not met the policy goes on to permit uses that make a positive contribution to the overall diversity of the centre. The Committee Report (7 December 2022) for the previous application to redevelop this Site (application reference 221235/FUL) acknowledged that *"based on an officer audit, the Class E(a) or E(c) percentage along Friar Street is already below 50% at 42%"* (paragraph 6.3). Emerging **Policy CR7** removes this 50% requirement.
- 5.12 In Section 4, further details are provided with regard to how this policy has been applied by the Council and the recognition that the 50% A1 / A2 requirement is out of step with national policy.

Visual Interest

- 5.13 It is important to consider that whilst a retail use would in all likelihood incorporate a glazed frontage, outside of normal hours of operation it would not contribute to the vibrancy of the town centre, the visual interest that would be provided would be dependent on the tenant at any particular point in time.
- 5.14 An extract from the proposed ground floor plan is set out in Section 3. This includes a central point of access / egress into the building, entrances that provide access to upper floors are recognised as being appropriate uses along Friar Street. The residents going about their daily business will create activity in the local area as well as contribute to the vibrancy in the immediate area.
- 5.15 It can be seen that immediately adjacent to Friar Street the following uses are proposed:
- **Entrance Lobby: Policy CR7** supports the provision of entrance to upper floors within the primary frontages of Central Reading. This is essential if upper floors are to be brought into an active and purposeful use and will also enable the intensification of use on this Site. The entrance lobby itself needs to be of a suitable size to support the proposed co-living development.
 - **Co-Working Space:** Space will be provided within the building where residents can work. This provides a more formal work area.
 - **Open Plan Games / Lounge Area:** This will provide recreational space for the residents of the building and is likely to be used during the day and evening.
- 5.16 In the assessment of the previous application on this Site (application PL/22/1235) Officers recognised that the proposed hotel use *"the use would attract a wide range of people into the centre (and support other centre uses) and is therefore broadly welcomed in land use terms"* (paragraph 6.4).

- 5.17 The proposed ground floor use will create an entrance lobby for the development on the upper floors and also create visual interest through the amenity uses that will be provided along Friar Street. In the consideration of the Co-Living Scheme at Greyfriars Road (PL/24/1501/FUL), Officers found that whilst no commercial uses were proposed at ground floor level an active frontage was proposed by virtue of facilities for residents and the main entrance which would create a *“welcoming and generous arrival space”*.
- 5.18 The proposed ground floor uses are therefore considered to be acceptable within the context of emerging **Policy CR7**.

6. Conclusion

- 6.1 This Retail Statement has set out that the existing uses on the ground floor of the Site are vacant or occupied on a short-term basis pending redevelopment. The two units that are occupied are only open during retail trading hours and therefore, do not drive footfall or create interest outside of these times.
- 6.2 The proposed development relates to the retention and reuse of the former Bugle public house and the creation of a co-living scheme with an entrance and amenity uses at the ground floor. It has previously been accepted by the LPA that there is no need for the former leisure uses / public house that were located on the Site, there has been no change to this situation and therefore the proposed development is in accordance with **Policy RL6**.
- 6.3 Emerging **Policy CR7** has removed the requirement to demonstrate that 50% of frontages within the primary frontages in Central Reading should remain in use Class A1 / A2. Entrances to upper floors are accepted as appropriate uses within the primary frontages, the remaining ground floor will comprise amenity space for the co-living scheme this will be of a high visual quality and provide an active building frontage to continue to the vibrancy of the town centre.
- 6.4 As set out in Section 4, it is clear that Officers are determining applications with reference to the requirements of emerging **Policy CR7**, noting that the adopted policy is out of step with national guidelines. Therefore, it is not necessary to demonstrate that 50% of Friar Street will remain within Class A1 or A2 use, indeed it is noted that Officers themselves have acknowledged that the existing mix of uses does not achieve this.
- 6.5 The proposed development and associated ground floor uses will attract a wide range of people in to the town centre and support other centre uses. The uses proposed as ground floor will create visual interest through the day and into the evening in contrast to a retail use which would only be open during the day.
- 6.6 The proposed ground floor uses are in accordance with the relevant adopted and emerging policies of the Reading Local Plan.

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