

138-144 Friar Street, Reading

Planning Statement

14th August 2026



Contents Title

1.	Introduction	3
2.	Site, Surroundings and Planning History	7
3.	Proposed Development	17
4.	Pre-application Engagement	19
5.	Planning Policy Context.....	22
6.	Planning Assessment.....	25
7.	Material Planning Considerations	46
8.	Summary and Conclusion	53
	Appendix 1 - Emerging Policy H15 (Purpose-Built Shared Living Accommodation)	55

1. Introduction

- 1.1 This Planning Statement has been prepared on behalf of The National Pub Portfolio Limited in support of a full planning application relating to the redevelopment of Nos. 138-144 Friar Street, Reading (the 'Site'). The application proposes the following:

"Phased redevelopment of the site involving the demolition of Nos. 138-141 and 142-143 Friar Street, partial demolition of No. 144 Friar Street, and erection of a basement and 6-storey building to provide co-living residential accommodation (purpose-built shared living accommodation - Sui Generis use class), together with the partial retention of the former Bugle Public House as a standalone Class E (Classes E(a)-E(e)) commercial unit."

- 1.2 The statement sets out the planning rationale for the proposed development and demonstrates how the scheme responds to national and local planning policy objectives while contributing positively to the continued regeneration of Reading town centre.

The applicant and background to the application

- 1.3 The National Pub Portfolio Limited is a long-standing investor in Reading town centre with a proven track record of delivering high-quality regeneration projects. Through ongoing collaboration with Reading Borough Council, local stakeholders, and civic and amenity groups, the company has played an important role in attracting investment and securing the restoration and enhancement of prominent sites within the town centre.
- 1.4 Since 2019, The National Pub Portfolio Limited has worked closely with the Council and key stakeholders to develop a shared vision for the redevelopment and restoration of the Queen Victoria Square 1 (QVS1) and Queen Victoria Square 2 (QVS2) sites. This collaborative approach has reflected a collective ambition to strengthen the vitality, attractiveness, and character of this important area of Reading town centre.
- 1.5 The successful implementation of the QVS1 scheme, comprising the refurbishment and conversion of 1-15 Queen Victoria Street and 147-148 Friar Street into a mixed-use development incorporating high-quality retail accommodation, an aparthotel, and a new public market square, demonstrates the applicant's commitment to delivering regeneration outcomes. The scheme received planning permission on 5 September 2023 and represents a landmark development at a key gateway location within the town centre. It has been widely recognised as making a positive contribution to economic vitality, townscape quality, and heritage-led regeneration objectives.
- 1.6 The application site (QVS2) previously benefited from planning permission for a 163-bedroom hotel development, approved on 24 May 2023. However, significant changes in market conditions have adversely affected the viability of the approved hotel use, preventing its delivery within the foreseeable future. Consequently, the planning permission expired on 24 May 2026. In response, the applicant has explored an alternative form of development that remains aligned with national and local planning policy objectives,

addresses identified housing needs, and supports the Council's aspirations for a vibrant, sustainable, and inclusive town centre.

- 1.7 The proposed development seeks to redevelop the site to provide high-quality co-living accommodation alongside active ground-floor commercial uses that will maintain and enhance the vitality and vibrancy of Friar Street. The scheme has been carefully designed to optimise the efficient use of this highly sustainable town centre location while remaining comfortably within the scale and massing parameters previously established by the approved hotel scheme. Notably, the proposed building is two storeys lower than the consented hotel development.
- 1.8 In addition to making a meaningful contribution towards the housing offer within Reading, the proposal will deliver a range of wider public benefits. These include vibrant active frontages, enhancements to the public realm, improved appreciation and setting of nearby heritage assets, biodiversity gains, and the integration of sustainable design measures and energy-efficient construction principles. As such, the development represents a viable and deliverable opportunity to secure the continued regeneration of this prominent and strategically important town centre site.
- 1.9 This Planning Statement demonstrates that the proposed development represents an appropriate and sustainable form of development that accords with the overarching objectives of national and local planning policy. The scheme will support Reading Borough Council's ambitions for town centre regeneration, housing delivery, economic resilience, and high-quality placemaking, while ensuring the long-term beneficial redevelopment and use of a strategically important site within Reading town centre.

Submission pack and structure of the Planning Statement

- 1.10 This application has been submitted via the Planning Portal and the requisite fee has been paid online. This application comprises the following documents:
- Application Forms and Certificates;
 - Completed CIL Form;
 - This Planning Statement prepared by Daniel Watney LLP;
 - Design and Access Statement, inclusive of Landscaping Design Strategy, Open Space Statement and Access and Security Strategy, prepared by Falconer Chester Hall (FCH);
 - Statement of Community Involvement prepared by Thackeray Group;
 - Heritage and Townscape Statement prepared by Revive & Tailor;
 - Retail Statement prepared by Avison Young;
 - Economic Benefits Statement prepared by Greengage;
 - Financial Viability Assessment prepared by ULL Property;
 - Co-Living Management Plan prepared by VervLife;

- Transport Statement prepared by Mode Transport Planning;
- Framework Travel Plan prepared by Mode Transport Planning;
- Delivery and Servicing Plan prepared by Mode Transport Planning;
- Daylight and Sunlight Assessment prepared by DPR LLP;
- Air Quality Assessment prepared by GEM Air Quality Ltd;
- Noise Impact Assessment prepared by Quantum Acoustics;
- Preliminary Ecological Appraisal, inclusive of Biodiversity Net Gain Assessment, prepared by James Blake Associates (JBA);
- Urban Greening Factor Assessment, within the Design and Access Statement, prepared by Exterior Architecture;
- Energy and Sustainability Statement prepared by Ecolytik;
- TM54 Operational Energy Assessment prepared by Ecolytik;
- Whole Life Carbon Assessment prepared by Ecolytik;
- Overheating Risk Assessment prepared by Ecolytik;
- Flood Risk Assessment and Drainage Strategy prepared by Ridge and Partners LLP;
- Heads of Terms - s106 Legal Agreement prepared by Thackeray Group;
- Outline Construction Management Plan, prepared by ELLNO,
- Fire Statement and Fire Engineering Review prepared by Jensen Hughes; and
- Utilities Statement prepared by Innovo.

1.11 The application is also supported by the following plans/drawings (all prepared by FCH):

- Location Plan (Drawing No. P21109-FCH-XX-XX-DR-A-1200, Rev P07)
- Site Plan Existing (Drawing No. P21109-FCH-XX-XX-DR-A-1201, Rev P09)
- Site Plan Proposed (Drawing No. P21109-FCH-XX-XX-DR-A-1203, Rev P06)
- Proposed Basement Floor Plan (Drawing No. P21109-FCH-XX-B1-DR-A-1399, Rev P16)
- Proposed Ground Floor Plan (Drawing No. P21109-FCH-XX-00-DR-A-1300, Rev P17)
- Proposed First Floor Plan (Drawing No. P21109-FCH-XX-01-DR-A-1301, Rev P16)
- Proposed Second Floor Plan (Drawing No. P21109-FCH-XX-02-DR-A-1302, Rev P16)
- Proposed Third Floor Plan (Drawing No. P21109-FCH-XX-03-DR-A-1303, Rev P16)
- Proposed Fourth Floor Plan (Drawing No. P21109-FCH-XX-04-DR-A-1304, Rev P16)
- Proposed Fifth Floor Plan (Drawing No. P21109-FCH-XX-05-DR-A-1305, Rev P16)
- Proposed Roof Plan (Drawing No. P21109-FCH-XX-RF-DR-A-1306, Rev P16)
- Proposed Friar Street Elevation (Drawing No. P21109-FCH-XX-XX-DR-A-1400, Rev P13)
- Proposed Fife Court Elevation (Drawing No. P21109-FCH-XX-XX-DR-A-1401, Rev P14)

- Proposed Courtyard Elevation (Drawing No. P21109-FCH-XX-XX-DR-A-1402, Rev P13)
- Proposed Rear Elevation (Drawing No. P21109-FCH-XX-XX-DR-A-1403, Rev P13)
- Sections A-A and B-B (Drawing Nos. P21109-FCH-BA-XX-DR-A-1500 Rev P06 and P21109-FCH-BA-XX-DR-A-1502 Rev P06)
- Proposed Phasing Plan (Drawing No. P21109-FCH-XX-XX-DR-A-1700, Rev P04)

1.12 This statement is structured as follows:

- Section 2 describes the application site and its wider surroundings and outlines the relevant planning history of the site.
- Section 3 describes the Proposed Development.
- Section 4 outlines the outcome of pre-application discussions with the Council, together with other pre-application engagement undertaken with relevant stakeholders.
- Section 5 outlines the planning policy context and the adopted development plan.
- Section 6 assesses the Proposed Development against the planning policies and statutory requirements relevant to the determination of the application.
- Section 7 sets out the material considerations relevant to the Proposed Development which, where the proposal accords with the development plan when read as a whole, provide further support for the grant of planning permission. Alternatively, should it be concluded that the Proposed Development does not accord with the development plan when read as a whole, these material considerations nevertheless indicate that planning permission should be granted. These considerations include the National Planning Policy Framework, particularly the implications of the Council's inability to demonstrate a five-year housing land supply, together with the substantial social, economic and environmental benefits arising from the Proposed Development.
- Section 8 provides a summary and conclusion, explaining why planning permission should be granted.

2. Site, Surroundings and Planning History

The site

- 2.1 The application site at 138-144 Friar Street comprises three separate, albeit interconnected, buildings. It represents a highly accessible brownfield site within Reading town centre, located in close proximity to Reading Station. The site forms part of Friar Street, a principal town-centre thoroughfare characterised by a diverse range of commercial uses and providing the setting for several important civic buildings to the east.
- 2.2 Friar Street exhibits a varied character and appearance, with considerable differences in scale, form, massing, architectural quality and townscape contribution along its length. A number of historic buildings have been retained towards the eastern section of the street, while the western section is undergoing significant change as a result of the ongoing Station Hill redevelopment, contributing to an evolving urban character.
- 2.3 Nos. 138-141 was, until recently, occupied by Revolución de Cuba. The group went into administration in February 2026, and immediately vacated the site. A charity has occupied the site as a meanwhile use since May 2026. Nos. 142-143 is occupied by a phone shop. The Bugle at No. 144, a former public house, has been vacant since 2021.
- 2.4 There is limited visual cohesion between the three properties, which differ markedly in height, form, age and architectural appearance (as shown in Figures 1 and 2). Nos. 138-143 are of relatively poor architectural quality and make a limited, if not negative, contribution to the character and appearance of Friar Street. Although No. 144 is locally listed, its current presentation is poor, with visible security measures, material degradation and prolonged vacancy detracting from its appearance and contribution to the street scene.
- 2.5 Also included within the red line boundary of the application site is some of the access route of Fife Court, which provides servicing access to the application site buildings and those which front onto Broad Street to the south and east from Friar Street.



Figure 1 - Front Elevation as Existing



Figure 2 - Front Elevation as Existing



Figure 3 - Fife Court



Figure 4 - The Site as seen from rear elevation (taken from October 2025)

- 2.6 Please also refer to the Design and Access Statement submitted with this application, which provides a comprehensive and illustrative site description.
- 2.7 The site is not listed but does contain the locally listed former 'Bugle' public house. There are other locally listed, as well as statutory listed, buildings to the north and east of the site, as shown in Figure 5.
- 2.8 The surrounding area comprises a diverse mix of uses, predominantly commercial in nature, located within Central Reading. Key commercial frontages are situated along Friar Street, Queen Victoria Street, Station Road (towards Reading Station), Broad Street and Union Street. Most notably, the Novotel and Ibis hotels are located immediately north of the site, on the opposite side of Friar Street.
- 2.9 The area is characterised by a significant concentration of retail and service-based uses at ground floor level, with offices and other commercial occupiers located on the upper floors. Residential properties are also present within the area, contributing to the mixed-use character of the area.
- 2.10 The surrounding built form varies considerably in terms of scale, architectural style and appearance, reflecting the evolution of the town centre and resulting in a diverse and varied streetscape.

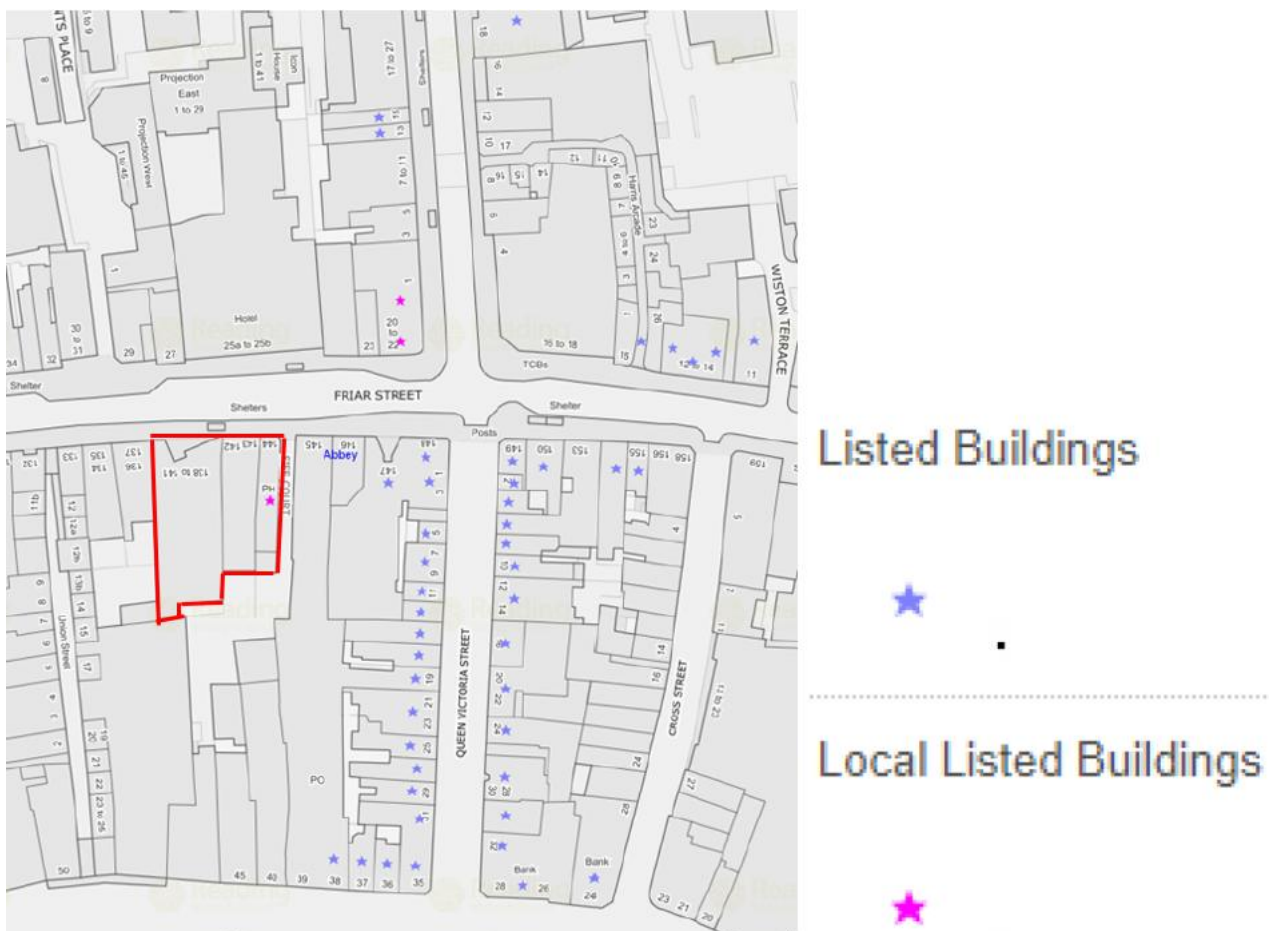


Figure 5 - Listed and locally listed buildings at and near to the site (the site outlined in red)

Planning history

2.11 The most relevant planning history is deemed to be the consent for the redevelopment of the site as a 163-bedroom hotel (ref. 221235/FUL), granted in May 2023.

2.12 The permission comprised the comprehensive redevelopment of the site, save for a part of the Bugle public house, and proposed 163 hotel rooms arranged across first to sixth floors (seven storeys in total), alongside an ancillary ground floor.



Figure 6 - CGI of the previous Hotel Consent on the Site

2.13 As described, this scheme is no longer deliverable and the permission expired in May 2026.

2.14 Although expired, this permission remains a material consideration, save for those relevant parts of the Local Plan Review, which has recently gone through examination, and any other subsequent material considerations, including any updated versions of national policy.

2.15 The principles established by that permission, including the loss of the existing uses; the redevelopment, including partial demolition of unlisted assets, of the site for an alternative use appropriate within the town centre; and the height, form and massing, materiality and finishes, impacts on neighbouring properties, energy and sustainability credentials, highways impacts, and greening and biodiversity opportunities, remain relevant to the scheme hereby submitted. The scheme hereby submitted seeks to build upon the extensive pre-

application engagement with stakeholders and the public undertaken in respect of the extant permission and to develop the scheme positively.

2.16 In addition to the permission relating to the wider site, the table below summarises the planning applications relevant to the section of the Site fronting Friar Street. Minor works, including shopfront alterations and advertisement/signage consents, have been excluded from the summary, as have duplicate Listed Building Consent applications. Accordingly, numerous applications relating solely to external shopfront alterations and signage are not included in the table below.

Table 1 - Planning history (excluding hotel consent)

App Ref	Description	Decision/Date
138-141 Friar Street		
991081	Refit of existing shop unit including new shop front and dividing wall between other occupants entrance and Bon Marchi.	Approved 21/3/2001
991120	Change of use of first floor from A1 (retail) to A2 (financial and professional services).	Approved 11/10/2000
991826	Proposed change of use of building from A1 (Retail) to use for a cafe bar/restaurant use within Class A3 of the Use Classes Order, & for open class A3 at first floor level.	Approved 24/11/1999
141673	Change of use of building from Class A1 retail to Class A4 bar, installation of external plant and alterations to shopfront.	Approved 19/02/2015
142-143 Friar Street		
010994	Change of use of ground floor to use Class A2 (Financial and Professional Services).	Approved 23/01/2002
144 Friar Street		
030948	Single storey rear extension and formation of roof terrace.	Approved 13/11/2003

2.17 We would also highlight proximate and relevant planning activity in the vicinity as follows.

QVS1+

2.18 QVS1+ encompasses a significant area to the east of the town centre, extending along Friar Street, Queen Victoria Street, Station Road, and Broad Street.

2.19 Originally consented in 2021 (QVS1) and subsequently modified and extended (+) in 2023 to include Nos. 145-146 Friar Street, QVS1 is now being implemented. The scheme delivers high-quality retail space, an aparthotel, and a new public market square, designed to reinvigorate the immediate area while complementing the established high street offer.

2.20 The recently expired consent for QVS2, although a standalone permission, was conceived as part of the broader QVS masterplan, extending its reach further along Friar Street. Figure 7 below illustrates the spatial relationship between QVS1 and QVS2 within this strategic framework.

2.21 The scheme submitted for this planning application similarly forms an integral component of the QVS masterplan. It seeks to reimagine this part of Reading town centre by introducing a diverse mix of uses that attract residents, visitors, and workers, supporting vitality, vibrancy, and long-term economic resilience.

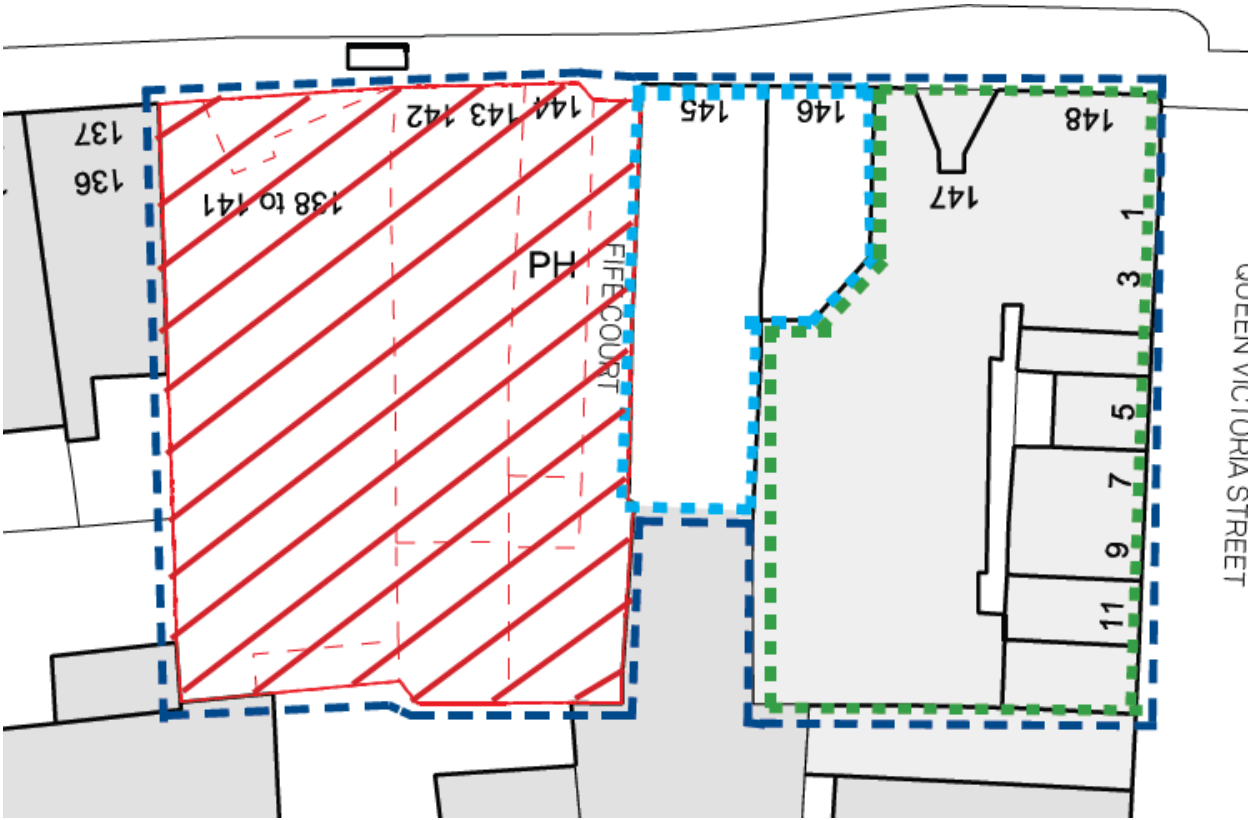


Figure 7 - Arrangement of QVS1 (shown in green), QVS1+ (shown in light blue) and QVS2 (shown in red)



Figure 8 : CGI of public square forming part of QVS1

20 - 30 Greyfriars Road

2.22 Planning permission (ref. PL/24/1501/FUL) was granted for a co-living development at 20-30 Greyfriars Road last year. The site is located to the west of the application site. The approved scheme involves the demolition of the existing office building and construction of a part 7-storey, part 13-storey building providing 266 co-living units.

2.23 This permission has helped to inform the design development of the scheme hereby submitted, which has sought to build upon those key principles established:

- Recognition of co-living tenure and its contribution to housing mix as a flexible and accessible product, including affordable housing delivery, in this highly accessible location;
- Creating generous and interesting communal spaces, supported by clear management strategies, to provide high-quality accommodation within robust operational parameters;

- Embody strong design quality and integration with the town centre setting, including active ground floor uses;
- Support high levels of sustainability and energy performance.



Figure 9 : CGI of 20-30 Greyfriars

136-137 Friar Street

2.24 Planning permission was granted for the redevelopment of nos. 136-137 Friar Street in January 2026. The development comprises the partial demolition of the existing building, and replacement with a five-storey rear extension to accommodate a Class C1 apart-hotel.

2.25 The existing building is a non-designated heritage asset, and whilst some harm was deemed to arise as a result of the proposed extension, this was outweighed by the public benefits include the apart-hotel use, retention of the Class E use, active frontages, sustainability and energy efficiency measures, and improvements of vegetation coverage and biodiversity.

2.26 We below at Figure 10 overleaf a visualisation submitted in support of that application, which shows the approved scheme against the context of the existing and, at that time, extant hotel permission for 138-144 Friar Street.



1 Proposed Scheme, Existing Context



2 Proposed Scheme, Future Context

Figure 10: CGI of 136-137 Friar Street Approved Scheme

Station Hill

2.27 Directly to the north of the site is Station Hill, a comprehensive regeneration area of 6.5ha, located between the train station and town centre. Heights of up to 23 storeys will ultimately be achieved, with land uses including offices, a range of Class E uses, Class C3 and other residential products, including a Build to Rent scheme known as 'Ebb and Flow'.

2.28 Station Hill is fundamentally changing the character of this part of the town centre, with a direct interface onto the northern side of Friar Street. We would refer to the Design and Access Statement that includes further information on Station Hill and the evolving townscape around the planning application site



Figure 11 : Station Hill Phase 3 CGI (Application site visible in right corner)

3. Proposed Development

3.1 The proposed scheme is summarised as follows:

- Demolition of Nos. 138-141 Friar Street (existing Revolución de Cuba bar);
- Demolition of Nos. 142-143 Friar Street (existing Eyesite Opticians building);
- Partial demolition of No. 144 Friar Street;
- Erection of a basement and six-storey building to provide 145 units of co-living residential accommodation (purpose-built shared living accommodation - sui generis use class); and
- Partial retention and refurbishment of the former Bugle Public House as a standalone Class E (*Classes E(a)-E(e)*) commercial unit.

3.2 The application seeks full planning permission for the comprehensive redevelopment of land comprising Nos. 138-144 Friar Street, Reading. The proposal includes the demolition of Nos. 138-143 Friar Street, the partial demolition and retention of No. 144 Friar Street (The Bugle Public House), and the construction of a new six-storey building with basement level.

3.3 The proposed development will deliver 145 units of purpose-built shared living accommodation (co-living), a sui generis residential use, arranged within a single, broadly T-shaped building form. The development has been carefully designed to make efficient use of this highly sustainable town centre site whilst providing high-quality accommodation and communal facilities for future residents.

3.4 The co-living accommodation will comprise individual residential units supported by a comprehensive range of shared amenity spaces and resident facilities. Internal and external communal areas will be provided at ground floor level and basement level, encouraging social interaction, community building and resident wellbeing. The basement will also accommodate ancillary facilities including secure cycle parking, resident amenity space and building plant.

3.5 The ground floor has been designed to provide an active frontage to Friar Street, maintaining the vibrancy and commercial character of the town centre. As part of the proposals, the most significant elements of The Bugle Public House will be retained and refurbished to provide a standalone Class E (*Classes E(a)-E(e)*) commercial unit, preserving its presence and continued contribution to the street scene.

3.6 The architectural approach seeks to establish a strong and attractive townscape presence whilst responding positively to the character of the surrounding area. The principal elevation is expressed as a clearly articulated

composition with a predominantly brick material palette, reflecting the prevailing character of Friar Street and the wider town centre environment.

- 3.7 A key component of the scheme is the retention of the most significant heritage elements of The Bugle Public House, including its principal frontage and part of its side elevation. This approach allows the locally listed building to remain a distinctive feature within the streetscape, preserving its historic significance while facilitating the comprehensive regeneration of the site.
- 3.8 The proposal represents the redevelopment of a previously developed site in a highly accessible town centre location, within easy walking distance of Reading railway station, public transport services, employment opportunities, retail facilities and community infrastructure. The scheme is therefore well placed to support sustainable patterns of living and reduce reliance on private car use.
- 3.9 Overall, the proposed development will deliver a high-quality co-living scheme that makes efficient use of a sustainable brownfield site, provides an attractive and professionally managed residential environment, retains important heritage features, and contributes positively to the vitality and continued regeneration of Reading town centre.

4. Pre-application Engagement

Background

- 4.1 The proposal has been informed by pre-application engagement with the Local Planning Authority and relevant stakeholders, alongside drawing on pre-application engagement and the detailed design development undertaken for the now expired hotel approval for the site. Lessons learned through this process have shaped the evolution of the current co-living proposals, ensuring that they align with the wider vision for Queen Victoria Street, and respond to stakeholder feedback secured in recent years. The development will create an active, sustainable and inclusive community while retaining the high architectural quality and strong urban character established through the approved redevelopment proposals.
- 4.2 The submitted Design and Access Statement explains in further detail how the proposed development has evolved in response to the pre-application engagement outlined below. In addition, the accompanying Statement of Community Involvement details the stakeholder and public consultation undertaken in advance of the submission of the application. Below is summary of the pre-application engagement undertaken with various parties and the feedback received which has informed the submitted scheme.

Reading Borough Council

- 4.3 The proposed redevelopment of 138-144 Friar Street was the subject of pre-application engagement with Reading Borough Council, including a meeting held on 27 February 2026 and subsequent formal written advice issued by the Council on 9 March 2026.
- 4.4 Overall, the Council's response was positive and confirmed that there were no in-principle planning objections that could not be overcome, with officers expressly stating that a scheme capable of being positively recommended appeared achievable. The principle of co-living accommodation in this highly sustainable town centre location was accepted, subject to demonstrating compliance with emerging Policy H15 and other relevant planning policies.
- 4.5 The Council welcomed a number of key aspects of the emerging proposals, including:
- The reduced height and massing compared with the previous hotel consent.
 - The enhanced prominence and retention of the locally listed Bugle Public House.
 - The town centre location as a suitable and sustainable location for co-living accommodation.
 - The commitment to provide a replacement commercial unit within the retained Bugle building.

- The potential for the revised proposals to result in a heritage impact that is less harmful than the previously approved scheme (owing to the considerable reduction in height and scale of the proposed new build elements).
- 4.6 The pre-application response identified a number of areas where further refinement and supporting information would be beneficial, particularly in relation to ground floor activation, quality of accommodation, servicing arrangements, and aspects of the detailed design. Officers also encouraged further design development to enhance architectural quality and strengthen the relationship between the proposed development, Fife Court and the Bugle building.
- 4.7 No technical consultees raised any fundamental objections to the redevelopment proposals, and the Council's transport officers confirmed that there were no in-principle transport objections to the proposed car-free development given its highly accessible town centre location.
- 4.8 The submitted application has been prepared having full regard to the constructive feedback received through the pre-application process, with the proposals refined to respond positively to the Council's comments and recommendations.

Reading Design Review Panel

- 4.9 The proposals were reviewed by the Reading Design Review Panel on 5 March 2026. The Panel was broadly supportive of the evolution of the scheme and recognised that the design adopts a clear and coherent architectural approach and considered the reduced scale (compared to the previous hotel consent) to be a positive response to the site and its surrounding context.
- 4.10 The Panel's comments principally focused on opportunities for further design refinement, including:
- Additional articulation of the roofscape and upper storey to better reflect the varied character of Friar Street.
 - Increased architectural modulation and detailing to break down the perceived width of the frontage and reinforce the site's historic urban grain.
 - Further enhancement of the side elevations and rear wings to provide greater visual interest and durability.
 - Consideration of additional active commercial frontage at ground floor level to strengthen town centre vitality and animation.
 - Continued review of daylight, privacy, overheating and cycle storage arrangements.
- 4.11 The Design Review Panel did not raise any fundamental concerns regarding the principle, scale or overall redevelopment approach. Instead, its feedback was constructive and focused on strengthening the architectural expression of the building and enhancing its contribution to the character and appearance of Friar Street.

- 4.12 The submitted application has been informed by the Panel's recommendations, with the design evolving in response to the comments received and further enhancing the quality and contextual integration of the proposed development.

Reading Conservation Area Advisory Committee and Reading Civic Society

- 4.13 On 1 June 2026, the emerging proposals were presented to representatives of the Reading Conservation Area Advisory Committee (CAAC) and the Reading Civic Society as part of the project's stakeholder engagement programme. The discussions were constructive and well attended, demonstrating a strong level of interest in the future redevelopment of this prominent town centre site. Participants welcomed the reduced scale and massing of the proposals compared with the previously approved scheme, recognising the improved relationship with the surrounding townscape and the increased prominence afforded to the locally listed Bugle Public House.
- 4.14 Stakeholders provided a range of constructive observations and recommendations relating to architectural detailing, the treatment of the street frontage and the site's historic context, particularly in relation to Friar Street and Fife Court. This feedback has informed the ongoing evolution of the scheme and contributed to further refinements to the design and heritage strategy. The engagement process has played an important role in shaping a development that responds positively to local aspirations and supports the delivery of a high-quality scheme that will make a positive contribution to the character, vitality and regeneration of Friar Street.

Public Consultation

- 4.15 The local community has also been consulted on the proposals through a leaflet drop and wider engagement activities, as detailed within the accompanying Statement of Community Involvement.

Summary

- 4.16 The proposed redevelopment has been informed by a comprehensive programme of pre-application engagement with Reading Borough Council, the Reading Design Review Panel, local heritage stakeholders and the wider community. The feedback received throughout this process has helped shape and refine the proposals, resulting in a scheme that responds positively to planning, design, heritage and operational considerations.
- 4.17 Overall, stakeholders recognised the benefits of the reduced scale and massing, the retention and enhancement of the locally listed Bugle Public House, and the opportunity to deliver a high-quality co-living development in a highly sustainable town centre location. The submitted application reflects this collaborative design process and seeks to deliver a development that will make a positive contribution to the character, vitality and ongoing regeneration of Friar Street.

5. Planning Policy Context

Adopted Development Plan

- 5.1 Section 70(2) of the Town and Country Planning Act 1990 (as amended) states that *“in dealing with an application for planning permission...the authority shall have regard to the provisions of the development plan, so far as material to the application...and any other material considerations”*.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that any planning application must be determined in accordance with the development plan for the area unless any material considerations indicate otherwise. The Development Plan policy documents that will be taken into account by Reading Borough Council (RBC) as Local Planning Authority (LPA) when determining planning applications currently comprise the Local Plan (2019).
- 5.3 The site is subject to the following relevant allocations and designations in the adopted Local Plan:
- The site is not specifically allocated for development within the Reading Borough Local Plan.
 - The site is located within the Reading Central Area.
 - The site falls within the designated Primary Shopping Area, Central Core, and Office Core.
 - The Friar Street frontage is identified as a Primary Frontage within Central Reading.
 - The site lies within an Air Quality Management Area (AQMA).
 - The site is located within an area of Archaeological Potential.
 - The site falls within the 'Station Hill and Around' town centre district heating cluster.
 - Friar Street forms part of the classified highway network and is designated as a cycle route.
 - The site is situated within Zone 1 of the adopted Parking Standards and Design SPD, representing the most accessible part of Reading town centre with excellent rail and bus connectivity and the highest concentration of public car parking.
 - The site is located outside the three designated Major Opportunity Areas (MOAs) within Central Reading, although the Station/River MOA lies immediately to the north, with Friar Street forming the boundary.
 - The site is not located within a Conservation Area but is approximately 145 metres west of the Market Place/London Street Conservation Area.
 - The site is located in proximity to a number of listed and locally listed buildings.
- 5.4 Where relevant, the allocations and designations are considered further in Sections 6 and 7 of this report.

Material Considerations

NPPF and NPPG

5.5 The National Planning Policy Framework (“NPPF”) (last updated December 2024) and National Planning Practice Guidance (“NPPG”) would also be a material consideration in the determination of this application.

Supplementary Planning Documents and other material considerations

5.6 Any adopted Supplementary Planning Documents (“SPDs”) and Guidance (“SPG”) also form material considerations in the determination of planning applications within RBC.

5.7 Relevant Supplementary Planning Documents (SPD) are:

- RBC Design Guide for Shopfronts (2022)
- Revised Parking Standards and Design (2011)
- Sustainable Design and Construction (2019)
- Planning Obligations (2015)
- Affordable Housing (2021)

5.8 Other relevant documents:

- Reading Biodiversity Action Plan (March 2021)
- BRE Site Layout Planning for Daylight and Sunlight - A guide to good practice, (BR 209 2011 edition)
- The National Design Guide (2019)
- The National Model Design Code (July 2021)
- London Plan Guidance ‘Large-Scale Purpose-Built Shared Living’ (GLA, Feb 2024)

Emerging Development Plan and its weight

5.9 Paragraph 2 of the NPPF confirms that:

“Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise”

5.10 Paragraph 49 of the NPPF explains that local planning authorities may give weight to relevant policies in emerging plans according to:

“Local planning authorities may give weight to relevant policies in emerging plans according to:

a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)”

5.11 The current Local Plan, adopted in November 2019, reached five years of age on 5 November 2024. The Plan was reviewed in March 2023, when the Council concluded that approximately half of its policies remained up to date. However, it considered that the remaining policies required updating to reflect changing circumstances and national planning policy. The Submission Draft Local Plan Partial Update (LPPU) was submitted for examination on 9 May 2025. At the time of writing, the examination-in-public of the LPPU is ongoing. Stage 1 hearing sessions were held virtually on 11 and 12 November 2025, with Stage 2 hearings taking place in February 2026.

5.12 1.2 Given the above, the examination of the emerging plan has reached a relatively advanced stage. Accordingly, some weight can be attributed to policies within the emerging plan in accordance with paragraph 49(a) of the NPPF. The weight to be afforded to individual policies depends on the extent of unresolved objections, the degree to which modifications are proposed, and their consistency with the NPPF, in accordance with paragraph 49(b) and (c).

1.3 In light of this, the relevant emerging policies are considered along with the adopted development plan policies in the following section of this report.

6. Planning Assessment

6.1 The key considerations in the determination of this application are:

- Land Uses and Principle of Development
- Affordable Housing
- Quality of Accommodation
- Heritage and Townscape Visual Impact Assessment
- Archaeology
- Air Quality
- Noise
- Transport and Access
- Design
- Landscaping, Biodiversity and Ecology
- Energy and Sustainability
- Flood risk and drainage
- Fire Safety
- Utilities
- Land contamination

6.2 These are assessed in turn under the subheadings below.

Land Uses and Principle of Development

6.3 The existing uses on the site comprise a recently vacated sui generis bar (formerly Revolución de Cuba), a Class E retail unit with ancillary accommodation on the upper floors, and the long-term vacant former public house, The Bugle. The proposed development seeks to redevelop the site to provide purpose-built shared living (co-living) accommodation together with the retention and reuse of The Bugle as a standalone Class E

(Classes E(a)-E(e)) commercial unit. The proposal would therefore deliver a mixed-use scheme that responds positively to the site's town centre location whilst making more effective use of this previously developed land.

- 6.4 In respect of the loss of the existing sui generis bar use, adopted Policy RL6 generally resists the loss of public house and leisure uses unless their function can be adequately fulfilled by alternative facilities. Given the site's location within Reading town centre, there are numerous comparable bars, public houses and licensed premises within both the immediate vicinity and the wider town centre. As such, the loss of these premises would not adversely affect the character, vitality or viability of the centre, as their function can be readily accommodated elsewhere nearby.
- 6.5 This conclusion was also reached during the assessment of the extant planning permission, and no material considerations have arisen since that decision that would necessitate a different conclusion. Furthermore, the application is supported by a Retail Statement prepared by Avison Young (July 2026), which demonstrates that Reading town centre benefits from a strong and diverse leisure and food and beverage offer, whilst also recognising the need for the centre to adapt to changing retail and leisure patterns. The Retail Statement concludes that residential uses can play an important role in supporting town centre vitality and viability by increasing footfall, expenditure and investment, whilst helping to address underutilised commercial floorspace.
- 6.6 The Bugle has been vacant since 2021 and it has previously been established as part of the extant permission that the premises are not capable of supporting a viable public house operation. As set out within the Retail Statement, Reading town centre contains a significant concentration of public houses, bars and leisure venues, such that the loss of The Bugle as a public house would not prejudice the overall leisure function of the centre. The acceptability of this loss in land use terms was similarly established through the extant planning permission.
- 6.7 Importantly, the proposal would retain The Bugle building and bring it back into active use through the provision of a standalone Class E commercial unit. Flexibility is sought across a range of Class E within Classes E(a)-E(e) to maximise the prospects of securing a viable occupier and ensure the long-term reuse of this non-designated heritage asset. The proposed Class E unit would remain publicly accessible and active in nature, helping to offset the loss of the existing Class E unit at Nos. 142-143 Friar Street and maintaining a commercial presence on the site.

Principle of Co-Living Development

- 6.8 Co-living is an increasingly established form of residential accommodation that responds to urban housing need by providing professionally managed homes with a combination of private living space and high-quality communal facilities. The model aligns with the objectives of the NPPF to make effective use of land and deliver a wider choice of homes that meet the needs of different groups within the community. Co-living accommodation is particularly well suited to highly accessible town centre locations where residents can benefit from immediate access to employment opportunities, services, leisure facilities and public transport connections.

- 6.9 Recent research undertaken by Savills¹ identifies Reading as one of the strongest co-living markets outside London, reflecting the town's substantial population of young professionals living within the private rented sector. Savills estimate that there are approximately 15,700 potential co-living occupiers within Reading, ranking the Borough second only to Brighton and Hove amongst markets outside the capital. The research also identifies a reduction in private rented sector stock, contributing to rental growth and affordability pressures, thereby reinforcing the need for alternative housing products.
- 6.10 Whilst the adopted Reading Local Plan does not contain a specific policy relating to co-living accommodation, emerging Policy H15 (Purpose-Built Shared Living Accommodation) recognises this form of development and directs it towards highly sustainable locations, including Reading town centre. The application site is centrally located within the town centre and is not allocated for conventional residential development. The proposal therefore accords with the locational strategy established through the emerging policy framework.
- 6.11 The proposed development has been designed in accordance with emerging policy requirements of H15 (with a detailed assessment of this emerging policy provided at Appendix 1) and recognised best practice for co-living accommodation. It would provide appropriately sized private accommodation supported by a comprehensive package of communal facilities, including co-working, social and amenity spaces, together with robust management arrangements and a highly sustainable location that promotes walking, cycling and public transport use.

Quantum of Accommodation

- 6.12 Policy CC6 requires the scale and density of development to be related to the level of accessibility by walking, cycling and public transport to a range of services and facilities. The supporting text to the policy identifies Reading town centre as the location with the highest levels of accessibility within the Borough and one of the most accessible locations within the South East.
- 6.13 The proposed development would deliver 145 co-living units together with a comprehensive package of internal and external communal amenity spaces, providing a high-quality residential environment in a highly sustainable location. The site benefits from exceptional accessibility, being within easy walking distance of Reading Station and the extensive range of employment, retail, leisure, community and cultural facilities available within Reading town centre.
- 6.14 Having regard to the site's town centre location and excellent accessibility credentials, the proposed scale and density of development are considered entirely appropriate and represent an efficient use of previously developed land. The proposal accords with the objectives of Policy CC6 and is consistent with the NPPF's support for optimising the use of sustainable urban sites and making effective use of land to meet identified housing needs (paragraphs 124 - 130).
- 6.15 Furthermore, the quantum of development reflects both the site's highly sustainable location and the strategic objective of directing growth towards accessible brownfield opportunities within the urban area. The proposal

¹ Provided as part the 'Co-living Needs Assessment' (dated 7th November 2024) submitted as part of the Greyfriars co-living application

would make effective use of a prominent town centre site whilst delivering a form of accommodation specifically intended to meet the needs of a growing segment of Reading's population. The density of development is therefore justified by the site's locational advantages and would contribute positively towards the efficient delivery of housing within Reading town centre.

Contribution to Housing Delivery

- 6.16 Policy H1 of the adopted Local Plan sets out the housing requirement for Reading, seeking to deliver an average of 689 homes per annum across the plan period. The supporting text describes “There is a pressing need for additional housing in Reading and the surrounding area”.
- 6.17 This need is reinforced through the ongoing Local Plan Review process, with increased housing delivery forming a key component of the Borough's future growth strategy which is expected to increase the minimum housing target to 822 new homes per annum, as per the requirements of Standard Method.
- 6.18 The redevelopment of this highly accessible brownfield site therefore represents a significant opportunity to contribute towards housing delivery within a sustainable location.
- 6.19 The proposal would accommodate up to 145 residents within a professionally managed co-living environment. Emerging planning policy recognises that co-living accommodation can contribute towards housing supply, applying a conversion ratio of four co-living units to one conventional dwelling. On this basis, the proposed development would be equivalent to approximately 36 new homes.
- 6.20 Beyond its quantitative contribution to housing delivery, the scheme would provide a high-quality housing product for a demographic that is often poorly served by traditional housing provision and would help alleviate pressure on conventional Class C3 housing stock by providing an alternative to shared occupation within larger residential properties.

Active Frontage and Town Centre Vitality

- 6.21 Policy CR7 seeks to ensure that development within the primary frontages of Central Reading provides active frontages that contribute positively to the vitality, vibrancy and attractiveness of the town centre. The supporting text highlights the importance of active ground-floor uses, visual interaction with the street and extensive glazing to create an engaging public realm.
- 6.22 As set out in the submitted Retail Statement, Reading town centre is experiencing many of the structural changes affecting centres across the country, including evolving retail habits, increased vacancy rates and a growing need to diversify land uses in order to maintain long-term vitality and viability. Drawing on the Council's Commercial Development Needs Assessment (January 2025), the Retail Statement identifies residential development as an important component of a balanced town centre mix, helping to support footfall, expenditure, investment and the resilience of existing businesses.
- 6.23 The proposed development would make a positive contribution towards these objectives through the introduction of a substantial resident population within the town centre. Future occupants would support local

shops, services, cafés, restaurants, public houses, leisure facilities and other commercial operators, generating expenditure and activity throughout the day and evening. The submitted Economic Benefits Statement (prepared by Greengage) estimates that residents would generate approximately £4.5 million in local expenditure annually, whilst the occupied development is anticipated to contribute approximately £15.9 million per annum to the Reading economy. The Statement also identifies that a significant proportion of residents are likely to work from home, increasing daytime activity and demand for local services within the town centre. Together, these benefits would support the vitality, viability and resilience of surrounding businesses.

- 6.24 The proposed scheme has been designed to respond positively to the objectives of Policy CR7 through the provision of active ground-floor uses, including the principal entrance, co-working facilities, communal amenity spaces and the retained commercial unit within the former Bugle Public House. As demonstrated within the Retail Statement, these uses have been deliberately positioned adjacent to Friar Street in order to maximise activity, natural surveillance and visual interest throughout the day and evening. Extensive glazing and active frontages would ensure an attractive and animated street presence.
- 6.25 The Retail Statement further notes that the Council's emerging approach to Policy CR7 places greater emphasis on securing active frontages and promoting town centre vitality than on retaining specific retail uses. Recent planning decisions have similarly recognised that co-living developments can deliver active and engaging frontages through resident amenity space, co-working facilities and managed entrances, even where traditional retail or commercial uses are not proposed across the entirety of the frontage.
- 6.26 In addition to providing an active frontage, the development would deliver wider economic benefits that support the long-term health of the town centre. The Economic Benefits Statement estimates that the scheme would support 13 direct and indirect local jobs during operation and generate significant ongoing expenditure within local businesses. The concentration of residents within a highly sustainable town centre location would assist in supporting a diverse range of commercial, leisure and service uses, contributing to a more vibrant and resilient centre throughout both the daytime and evening economy. The proposal is therefore considered to support the vitality and viability of Reading town centre and to accord with the objectives of Policy CR7.

Summary on Land Uses and Principle of Development

- 6.27 Overall, the proposed development would secure the redevelopment of a highly sustainable brownfield site, provide a high-quality co-living scheme, reintroduce a viable commercial use within The Bugle, support housing delivery and contribute positively to the vitality and viability of Reading town centre.
- 6.28 The proposal accords with the objectives of Policies RL6, CR7, CC6 and H1 of the Development Plan and is further supported by emerging Policy H15 and the conclusions of the submitted Avison Young Retail Statement and Greenage Economic Benefits Statement.
- 6.29 The significant benefits associated with the delivery of new homes, increased town centre activity, support for local businesses, the reuse of a vacant heritage asset and the effective redevelopment of previously developed land weigh strongly in favour of the proposed development.

Quality of accommodation

6.30 Policy CC8 of the Reading Local Plan requires development to provide acceptable living conditions for future occupiers and to avoid detrimental impacts on residential amenity, including matters relating to privacy, daylight and sunlight, outlook, noise, disturbance, safety and environmental conditions.

Space Standards

6.31 The proposed development has been designed to provide a high standard of residential accommodation. All co-living units would exceed the minimum standards set out in emerging Policy H15, with each unit providing a minimum internal area of 20 sqm GIA against the policy requirement of 18 sqm.

6.32 In addition, 11 wheelchair-accessible units (8% of the total provision) would be provided, each offering approximately 26.7 sqm of internal floorspace. This exceeds the accessibility requirements generally applied to conventional residential development and demonstrates a commitment to providing an inclusive and accessible living environment.

6.33 The proposed development therefore exceeds the emerging minimum space standards across the scheme, ensuring a good standard of accommodation for future residents.

Daylight and Sunlight

6.34 A detailed Daylight and Sunlight Assessment prepared by DPR LLP has informed the design process and has been used to optimise window positioning, internal layouts and façade design. The assessment demonstrates that the proposed development will have a negligible impact on neighbouring occupiers, with 100% of tested neighbouring windows and rooms complying with the BRE guidelines for daylight and sunlight. In respect of future residents, the assessment concludes that 73% of habitable rooms satisfy the BRE daylight recommendations and 54% satisfy the BRE sunlight recommendations. The assessment further concludes that the overall level of natural light achieved is appropriate for a co-living development within a highly constrained town centre location and is commensurate with other recently approved residential-led developments in central Reading.

6.35 The proposed development performs favourably when compared with the recently approved co-living development at 20-30 Greyfriars Road (PL/24/1501/FUL), where Reading Borough Council accepted a similar level of compliance having regard to the constraints of a town centre site, the nature of co-living accommodation and the provision of extensive communal amenity space.

6.36 Where departures from BRE guidance occur, these must be considered in the context of a constrained brownfield site within Reading town centre. The efficient redevelopment of the site, the highly sustainable location, the generous individual apartments, the quality and extent of the proposed communal facilities and the nature of co-living accommodation provide important mitigating factors. The proposed development will also provide communal lounges, co-working space, dining areas and external amenity areas that offer additional opportunities for residents to access well-lit shared spaces.

6.37 Furthermore, the BRE guidance is advisory rather than mandatory and is intended to be applied flexibly in dense urban environments where making efficient use of sustainable brownfield land is a key planning objective. The assessment therefore concludes that the proposed development will provide acceptable living conditions for future occupiers and accords with Policy CC8 of the Reading Local Plan.

Outlook and Residential Environment

6.38 The proposed co-living units would benefit from good levels of outlook through appropriately sized windows and a range of orientations across the development. Whilst the site is located within a dense urban town centre environment, this is an intrinsic characteristic of central Reading and is reflective of the surrounding townscape.

6.39 Future residents would benefit from immediate access to employment opportunities, retail and leisure facilities, community services and excellent public transport connections, including Reading Station. The combination of private studio accommodation and extensive communal facilities would provide a high-quality residential environment that is appropriate to the site's highly sustainable location.

Communal Amenity Space

6.40 A key characteristic of successful co-living developments is the provision of high-quality communal facilities. Emerging Policy H15 requires schemes accommodating more than 100 residents to provide a minimum of 3 sqm of internal communal amenity space per resident. The proposed development has been designed to satisfy this requirement through the provision of approximately 445 sqm of internal communal amenity space, equivalent to approximately 3 sqm per resident.

6.41 The communal facilities would include co-working space, resident lounges, shared dining areas, bookable dining facilities, a gymnasium, multimedia room, laundry facilities and associated resident services. These spaces have been carefully distributed throughout the building to encourage social interaction, support resident wellbeing and provide opportunities for both collaborative and private activities. The extent and quality of the communal provision significantly exceeds that typically associated with conventional residential development and forms a fundamental component of the co-living model.

6.42 In addition, the development would provide approximately 154 sqm of dedicated external amenity space in the form of a landscaped courtyard designed to accommodate a variety of activities, including informal recreation, outdoor working, social interaction and quieter areas for relaxation. The courtyard incorporates a hierarchy of spaces, seating areas, planting, outdoor workstations and pocket gardens, creating an attractive and functional environment for residents. Whilst there is no adopted local standard for external amenity provision for co-living developments, the proposed provision is considered entirely appropriate having regard to the town centre location, the nature of the accommodation and the extensive internal amenity offer.

Privacy and Overlooking

6.43 Policy CC8 advises that the position of habitable rooms, windows and amenity areas should be carefully considered to safeguard privacy. Whilst the development does not achieve the Council's general guideline of a

20-metre back-to-back separation distance, this guidance is not intended to be applied rigidly within highly urbanised town centre environments such as central Reading, where a tighter urban grain and closer building relationships are characteristic features of the built environment.

6.44 The relationship between the proposed development and the approved QVS1 scheme across Fife Court has been carefully considered throughout the design process. Following detailed design review and pre-application discussions, the scheme was amended to optimise separation distances whilst retaining acceptable levels of daylight and sunlight for future occupiers. The submitted Design and Access Statement confirms that separation distances range from approximately 8 metres to 9.5 metres at the closest points, reflecting the established urban character of the area.

6.45 The design incorporates a range of measures to ensure acceptable levels of privacy are maintained, including careful window placement, high-quality internal layouts and the positioning of communal amenity spaces at lower levels. In balancing privacy considerations with the need to deliver well-lit accommodation in a sustainable town centre location, the proposals represent an appropriate and proportionate response to the site's constraints and context. Overall, future residents would experience a level of privacy consistent with expectations for a central urban environment.

Operational Management

6.46 The application is supported by a Co-Living Management Plan prepared by VervLife, a specialist co-living and build-to-rent operator. The document demonstrates how the building would be professionally managed to create a safe, secure and high-quality living environment. The Management Plan includes details relating to tenancy management, resident wellbeing, community-building initiatives, security arrangements, maintenance, cleaning, waste management, complaints procedures and fire safety management.

6.47 The Management Plan confirms that the development would benefit from a dedicated on-site management team, concierge services, 24-hour management arrangements, CCTV coverage, secure access controls and regular resident engagement activities. These arrangements accord with the aspirations of emerging Policy H15 and provide confidence that the development would operate as a professionally managed and sustainable residential community.

Summary on the Quality of Accommodation

6.48 Overall, the proposed development would deliver a high-quality co-living environment that exceeds the emerging minimum space standards, provides extensive communal amenity facilities, incorporates 445 sqm of internal communal space and 154 sqm of external landscaped amenity space, achieves acceptable living conditions for future occupiers and benefits from a comprehensive operational management framework.

6.49 When assessed in the context of its highly sustainable town centre location, the nature of co-living accommodation, the planning history of the site, the extensive communal amenity provision and the recently approved co-living developments elsewhere in Reading, the proposal is considered to provide an attractive, inclusive and well-managed living environment. The development therefore accords with the objectives of Policy CC8 of the Reading Borough Local Plan and the aims of emerging Policy H15.

Affordable housing

- 6.50 In accordance with paragraphs 63 and 65 of the National Planning Policy Framework, the proposed development has been assessed against relevant national and local planning policy requirements relating to affordable housing, recognising the importance of supporting mixed and balanced communities whilst ensuring that development remains deliverable.
- 6.51 Whilst co-living accommodation does not fall within the conventional Class C3 housing model, emerging Policy H15 provides a clear framework for considering affordable housing contributions from purpose-built shared living developments. The policy anticipates the provision of an off-site financial contribution in lieu of on-site affordable housing, reflecting the operational characteristics of co-living schemes and recognising that the provision of affordable units within a managed co-living environment is generally impractical.
- 6.52 Emerging Policy H15 confirms that purpose-built shared living developments should make an affordable housing contribution at a level equivalent to Policy H3. For the purposes of calculating this requirement, the emerging policy applies a conversion ratio whereby four co-living units are treated as equivalent to one conventional dwelling. On this basis, the proposed development comprising 145 co-living units equates to approximately 36 Class C3 dwellings, against which any affordable housing requirement would ordinarily be calculated.
- 6.53 Notwithstanding the above, the application is supported by a detailed Financial Viability Assessment prepared by ULL Property. The assessment has been undertaken in accordance with National Planning Practice Guidance and the RICS Professional Statement Financial Viability in Planning. The appraisal assesses the full development costs and revenues associated with the scheme, including construction costs, finance charges, Community Infrastructure Levy, professional fees, disposal costs and an appropriate developer return.
- 6.54 The Financial Viability Assessment demonstrates that the proposed development generates a negative residual land value of approximately £2.94 million. This compares with a benchmark land value of approximately £2.53 million, derived from the existing use value of the site together with an appropriate landowner premium. The assessment therefore concludes that the proposed development does not generate sufficient value to support an affordable housing contribution whilst maintaining a viable and deliverable form of development.
- 6.55 The viability assessment identifies a Gross Development Value of approximately £32.5 million, based on the completed investment value of the proposed co-living development. However, the substantial construction costs associated with the redevelopment of this constrained town centre site, alongside finance costs, professional fees, Community Infrastructure Levy liabilities and other development costs, result in a scheme that cannot support additional planning obligations without prejudicing delivery.
- 6.56 This approach is consistent with both adopted Policy H3 and emerging Policy H15 of the Reading Borough Local Plan. Whilst these policies seek affordable housing contributions from qualifying developments, they expressly recognise that contributions may be reduced or waived where robust viability evidence demonstrates that policy requirements would render a scheme undeliverable. The policies therefore incorporate flexibility to ensure that otherwise sustainable development is not prevented from coming forward.

6.57 In accordance with these requirements, the application is supported by an open-book Financial Viability Assessment prepared specifically for the scheme. The assessment concludes that the proposed development cannot viably support an affordable housing contribution and that any such requirement would further worsen an already negative viability position. The proposal should therefore be regarded as compliant with the viability provisions contained within both adopted and emerging affordable housing policies be considered compliant with the flexibility built into both adopted and emerging affordable housing policies.

Heritage and Townscape Visual Impact Assessment

6.58 The proposed development has been designed with careful regard to the historic environment and is supported by a Heritage and Townscape Statement prepared by Revive & Tailor. Whilst the site does not lie within a Conservation Area and contains no designated heritage assets, The Bugle Public House at No. 144 Friar Street is included on Reading Borough Council's Local List and therefore constitutes a non-designated heritage asset. The site also forms part of the wider setting of nearby heritage assets, including the Grade II listed buildings at 147 Friar Street and Queen Victoria Street, together with the Market Place/London Street Conservation Area.

6.59 The Heritage and Townscape Statement confirms that the majority of the existing buildings at Nos. 138-143 Friar Street make a limited contribution to the significance of the surrounding historic environment. The report concludes that their architectural and historic value is neutral at best, and that their replacement with a higher quality building would provide an opportunity to enhance the character and appearance of this part of Friar Street.

6.60 In contrast, The Bugle possesses historic and communal significance arising from its longstanding use as a public house and its contribution to the collective memory of Reading town centre. The Heritage Statement concludes that the principal significance of the building is concentrated within the oldest parts of the structure, particularly the frontage onto Friar Street and the visible section of the building addressing Fife Court. The proposal has therefore been designed to retain and restore these most significant elements of the locally listed building, consistent with the approach established through the extant planning permission.

6.61 Whilst the revised scheme proposes the removal of a greater proportion of the rear and side sections of The Bugle than the previous hotel consent, the Heritage Statement demonstrates that these areas contain limited surviving historic fabric and have been subject to extensive alteration throughout the twentieth century. The original form of the former tenements and ancillary structures is no longer legible, and the rear portions of the building make only a limited contribution to the significance of the asset. The assessment therefore concludes that the proposed demolition would result in only a very low level of harm to the significance of the non-designated heritage asset.

6.62 Importantly, the proposal would secure the long-term retention, repair and reuse of the most significant parts of The Bugle through its conversion to an independent Class E commercial unit. This approach would preserve the building's presence within the Friar Street streetscene, maintain its contribution to the character of Fife Court and ensure that the asset remains in active use. The Heritage Statement identifies this as a heritage benefit which would sustain both the historic and communal significance of the building.

- 6.63 The treatment of Fife Court forms a further benefit of the scheme. The Heritage Statement notes that the court currently presents a poor-quality environment, with extensive alterations, blocked openings, exposed services and deteriorating building fabric detracting from its historic character. The proposed redevelopment would introduce an active frontage, high-quality brick architecture and enhanced surveillance, helping to revitalise the space whilst improving its appearance and perceived safety.
- 6.64 In townscape terms, the proposed building has evolved through extensive engagement with Council officers and builds upon the principles established by the extant consent. The revised design incorporates a reduced overall scale and massing, a more domestic architectural expression reflecting its residential use, a traditional brick material palette and a roof form that responds to the established character of Friar Street. The Heritage Statement concludes that the development respects the prevailing rhythm, scale and proportions of neighbouring buildings whilst providing a contemporary addition that contributes positively to the evolving townscape of central Reading.
- 6.65 The Heritage and Townscape Statement further concludes that the reduced massing behind The Bugle allows the historic building to be read more clearly as a standalone structure than under the extant permission, thereby enhancing appreciation of its form and significance. The proposal would therefore preserve the contribution made by The Bugle to the wider streetscene whilst delivering wider townscape enhancements through the replacement of buildings of limited heritage value with high-quality contemporary architecture.
- 6.66 Having regard to the statutory duty, the National Planning Policy Framework and Policies EN1, EN4, EN6, CC7 and CR2 of the Reading Local Plan, the Heritage and Townscape Statement concludes that any harm arising from the partial demolition of The Bugle would be very limited and would be outweighed by the substantial heritage and townscape benefits associated with the restoration and reuse of the locally listed building, the regeneration of Fife Court and the delivery of a high-quality new development. Overall, the proposal is considered to preserve and enhance the significance of affected heritage assets and their settings and would make a positive contribution to the character and appearance of Reading town centre.

Archaeology

- 6.67 An archaeological desk-based assessment (DBA) was prepared and submitted in support of the previously approved hotel scheme (planning permission ref. 221235/FUL). Since the approval of that scheme, we have contacted Berkshire Archaeology regarding the current proposals and the relevance of the previous assessment.
- 6.68 Berkshire Archaeology has confirmed that, whilst the earlier DBA is now dated and would need to be updated to reflect the revised development proposals, archaeological matters can appropriately be addressed through the imposition of a planning condition. It has also been advised that, given the site's location within Reading's historic medieval core, any planning permission is likely to be accompanied by a condition requiring an agreed programme of archaeological investigation and recording.
- 6.69 Accordingly, it is considered that archaeological matters can be satisfactorily addressed through the use of appropriately worded planning condition.

Air Quality

- 6.70 An Air Quality Assessment has been prepared by GEM Air Quality Ltd in support of the application. The assessment considers the potential effects of both the construction and operational phases of the proposed development and has been undertaken with reference to national guidance, relevant technical standards and Policy EN15 of the Reading Local Plan. Local Plan Policy E15 requires that where development would introduce sensitive uses (such as residential) into an Air Quality Management Area, detrimental effects on that use will be mitigated, and such mitigation measures should be detailed.
- 6.71 The site is located within Reading Borough Council's Air Quality Management Area (AQMA), which has been designated for nitrogen dioxide (NO₂) emissions associated with road traffic. The assessment therefore considered the suitability of the site for residential occupation and the potential impacts of future traffic-related emissions on future residents.
- 6.72 A qualitative assessment of construction phase impacts identified a low to medium risk of dust effects in the absence of mitigation. However, the assessment concludes that the implementation of standard best-practice mitigation measures, secured through a Construction Environmental Management Plan and related planning conditions, would reduce the significance of construction dust effects to negligible levels. Appropriate dust management, monitoring and site management measures are recommended to ensure impacts on neighbouring receptors remain acceptable throughout the construction period.
- 6.73 The operational assessment modelled concentrations of nitrogen dioxide (NO₂), particulate matter (PM₁₀) and fine particulate matter (PM_{2.5}) at representative receptor locations across the proposed development. The assessment utilised the latest available monitoring data from Reading Borough Council and considered future-year traffic scenarios. The results demonstrate that predicted pollutant concentrations at all residential receptors would remain comfortably below the relevant national air quality objectives.
- 6.74 The assessment concludes that all modelled receptors fall within Air Pollution Exposure Criteria (APEC) Category A, indicating that there are no air quality grounds for refusal. Furthermore, no specific building mitigation measures are required to secure acceptable living conditions for future occupants.
- 6.75 Overall, the Air Quality Assessment concludes that the proposed development would not give rise to unacceptable air quality impacts and would provide an acceptable environment for future residents. The development is therefore considered to comply with Policy EN15 of the adopted Reading Local Plan and the equivalent provisions of the emerging Local Plan.

Noise and Vibration

- 6.76 Policy CC8 seeks to ensure that development provides acceptable living conditions for future occupiers and does not result in unacceptable impacts arising from noise and disturbance.
- 6.77A Noise Impact Assessment prepared by Quantum Acoustics has assessed the suitability of the site for residential development, having regard to national policy, ProPG guidance (*"ProPG: Planning and Noise: Professional Practice Guidance on Planning and Noise: New Residential Development"*) and relevant British

Standards. The assessment recognises that the site occupies a busy town centre location where prevailing noise sources include traffic on Friar Street, bus movements, pedestrian activity and the surrounding evening economy.

- 6.78 Detailed noise monitoring and assessment identified a medium daytime noise risk and a higher night-time noise risk along the Friar Street frontage, whilst the rear of the site benefits from a significantly quieter acoustic environment. A full ProPG Stage 2 assessment was therefore undertaken to inform the design of the scheme and the required mitigation measures.
- 6.79 The assessment concludes that the development incorporates a robust acoustic design strategy, including the careful arrangement of uses, enhanced glazing specifications, mechanical ventilation systems and screened external amenity spaces. These measures will ensure that appropriate internal and external noise standards can be achieved for future residents, whilst also addressing overheating and ventilation requirements.
- 6.80 The assessment also considers the Agent of Change principle and confirms that the development can be successfully integrated within Reading town centre without placing unreasonable restrictions on existing nearby bars, public houses and entertainment venues.
- 6.81 Overall, the Noise Impact Assessment concludes that the proposed development can provide a suitable living environment for future residents and that, subject to the recommended mitigation measures, the proposal complies with Policies CC8, EN16, EN17 and CR6 of the Reading Local Plan

Transport and Access

- 6.82 The application is supported by a Transport Statement, Framework Travel Plan and Delivery and Servicing Plan prepared by Mode Transport Planning. Together, these documents demonstrate that the proposed development is appropriately located within one of the most accessible and sustainable locations in Reading and can be accommodated without adverse impacts on the operation or safety of the local transport network.
- 6.83 Policy TR5 requires development to provide car and cycle parking at a level appropriate to the accessibility of the site. The application site occupies a highly sustainable town centre location on Friar Street, approximately 300 metres from Reading Railway Station and immediately adjacent to a wide range of bus services, cycle routes, employment opportunities, retail facilities and community services. The submitted Transport Statement confirms that the site achieves a Public Transport Accessibility Index (PTAI) score of 41.21, reflecting its exceptional accessibility credentials.
- 6.84 In light of these locational advantages, the development is proposed as a car-free scheme. This approach is consistent with the site's existing operation, previous planning permissions affecting the site and the conclusions reached during pre-application discussions with Reading Borough Council, which acknowledged that a car-free development is acceptable in this location given its proximity to Reading Station and extensive public transport connections.
- 6.85 The proposed development includes 56 secure cycle parking spaces located within the basement level of the building. Whilst there are no adopted cycle parking standards for co-living accommodation within Reading, the

provision has been assessed against comparable standards for both conventional residential development and halls of residence. The proposed ratio of approximately 0.38 cycle spaces per unit exceeds the provision accepted as part of the recently approved co-living development at 20-30 Greyfriars Road and is considered appropriate having regard to the highly walkable town centre location, the accessibility of public transport and local travel patterns within central Reading.

- 6.86 The submitted Transport Statement demonstrates that future residents will have excellent access to sustainable travel opportunities. Numerous bus services stop immediately adjacent to the site, whilst Reading Railway Station is within approximately four minutes' walking distance and provides direct connections to destinations including London, Oxford, Birmingham, Bristol, Southampton and Cardiff. The surrounding pedestrian environment benefits from wide footways, controlled crossing points and extensive pedestrianised areas, whilst the wider cycle network provides convenient links throughout the Borough.
- 6.87 A review of Personal Injury Collision data confirms that there are no highway safety concerns associated with the site or surrounding road network that would preclude redevelopment. The Transport Statement concludes that the existing transport infrastructure is operating safely and effectively and that the proposed development would not result in any unacceptable transport impacts.
- 6.88 The Framework Travel Plan establishes a range of measures to encourage walking, cycling and public transport use, including the appointment of a Travel Plan Co-ordinator, resident travel information, promotion of active travel and ongoing monitoring of travel behaviour. The Travel Plan reflects the inherently sustainable nature of the site and seeks to maximise the use of non-car modes of transport by future residents.
- 6.89 The Delivery and Servicing Plan confirms that deliveries, servicing and refuse collection can be accommodated using the existing loading facilities on Friar Street. Servicing activity would utilise established loading bays and would be managed to avoid peak periods and minimise disruption to the wider transport network. The assessment demonstrates that servicing demand generated by the development would be modest and capable of being accommodated within the existing arrangements.
- 6.90 Overall, the submitted transport evidence demonstrates that the proposed development would be highly accessible by sustainable transport modes, would operate successfully as a car-free scheme and would not result in unacceptable impacts on highway safety or the operation of the local transport network. The proposal therefore accords with Policies TR1, TR3, TR4 and TR5 of the Reading Local Plan together with the wider objectives of the National Planning Policy Framework in promoting sustainable transport choices and reducing reliance on the private car.

Design

- 6.91 Policy CC7 seeks high-quality design that maintains and enhances the character and appearance of the area within which it is located. Within Central Reading, Policy CR2 requires development to respond positively to the established urban structure, deliver high-quality architecture and public realm, contribute to the vitality and diversity of the town centre, and ensure that development is capable of adapting to future needs.

- 6.92 The proposed development has been informed by a comprehensive and iterative design process and is supported by a detailed Design and Access Statement prepared by Falconer Chester Hall. The design has evolved in response to the site's constraints and opportunities, its heritage context, the established character of Friar Street and the rapidly changing townscape of central Reading. Particular emphasis has been placed on creating a contemporary building that is rooted in its surroundings through the use of high-quality materials, strong architectural articulation and a design approach inspired by the historic urban grain and architectural character of Friar Street. The extensive use of red brick reflects the prevailing material palette of Reading town centre and establishes a strong visual relationship with the area's historic commercial buildings.
- 6.93 The proposals have been shaped through extensive design development, pre-application engagement with Reading Borough Council, review by the Reading Design Review Panel, and consultation with heritage stakeholders including Reading Civic Society and the Reading Conservation Area Advisory Committee. The design team undertook a comprehensive testing process examining alternative massing options, roof forms, façade compositions and the relationship between the new building and the locally listed Bugle Public House. Through this process the scheme has evolved into a more contextual, heritage-responsive and refined proposal that directly addresses stakeholder feedback.
- 6.94 The proposed building respects the established grain and rhythm of Friar Street and reinforces the continuity of the historic street frontage. The elevation has been carefully articulated through a strong vertical composition, projecting brick piers, varied material treatments and the subdivision of the frontage into distinct elements to reduce the perceived scale and mass of the building. Active ground floor uses, including the principal residential entrance, co-working space, shared amenity facilities and the retained Bugle Public House, will provide activity, surveillance and visual interest at street level, contributing positively to the vitality and attractiveness of the public realm.
- 6.95 A number of key design refinements have been incorporated during the evolution of the scheme, including:
- A significant reduction in overall height and massing compared with the extant hotel permission.
 - The introduction of a more articulated and contextually responsive roof form, including a recessive upper storey and dormer features that reduce visual prominence.
 - The use of a high-quality red brick façade and carefully detailed material palette reflecting the character of Friar Street.
 - The subdivision of the frontage into a series of visually distinct elements that respond to the fine urban grain of the surrounding townscape.
 - A more sensitive relationship with the locally listed Bugle Public House, allowing it to remain a focal building within the street scene.
 - The retention and restoration of the principal elevations of The Bugle to secure its long-term conservation and active reuse.

- Improvements to the Fife Court elevation through the introduction of active frontages, high-quality materials and architectural detailing informed by the historic cottages that once occupied the area.
- The creation of an active and engaging ground floor frontage accommodating communal facilities and commercial uses that support town centre vitality.

6.96 The Heritage and Townscape Statement concludes that the revised scale, form and massing of the proposal sit comfortably within the prevailing townscape character of Friar Street and represent a clear improvement over the previously approved scheme. At six storeys, the development responds appropriately to the range of building heights within the immediate area and reflects the evolving urban context created by major regeneration projects including Queen Victoria Street and Station Hill. The proposal reinforces the existing urban grain, respects important townscape views and contributes positively to the continued regeneration of this part of Reading town centre.

6.97 A particularly important element of the design approach is the retention, restoration and active reuse of the locally listed Bugle Public House. The scheme has been specifically designed to preserve the significance of this historic building and enhance its presence within the streetscape. The Bugle has directly informed the architectural language, materials and detailing of the proposed development, creating a coherent relationship between the retained heritage asset and the contemporary building whilst ensuring that the historic structure remains a highly visible and legible component of the site.

6.98 The proposals also deliver wider townscape and public realm benefits through the enhancement of Fife Court, the replacement of underutilised and poor-quality buildings with high-quality contemporary architecture, and the introduction of active frontages, increased activity and natural surveillance. Together these improvements will contribute towards a safer, more attractive and more vibrant town centre environment.

6.99 In addition to its external appearance, the development has been designed to provide a high-quality living environment for future residents. The scheme incorporates extensive communal amenities including co-working space, shared dining facilities, a residents' lounge, gymnasium, multimedia room and landscaped external amenity space. Accessible accommodation is provided throughout the development and will be supported by robust management and security arrangements, ensuring the creation of a safe, inclusive and attractive residential community.

6.100 Overall, the proposal represents a high-quality design response that has evolved through a rigorous and collaborative design process. The scheme successfully responds to the character of Friar Street, conserves and enhances the significance of The Bugle, improves the quality of the surrounding townscape and delivers a contemporary development that contributes positively to the ongoing regeneration of Reading town centre. The proposal therefore accords with the objectives of Policies CC7 and CR2 of the Reading Borough Local Plan and the design objectives of the National Planning Policy Framework.

Ecology, Biodiversity Net Gain and Urban Greening

6.101 Policy CC7 seeks to enhance and optimise nature through the integration of existing and new natural features into a multifunctional network that supports quality of place, biodiversity, water management and

climate change mitigation. Emerging Policy EN19 (Urban Greening Factor) requires development proposals to demonstrate how appropriate levels of greening will be delivered through landscaping, planting, green roofs and other green infrastructure measures.

6.102 Policy EN12 sets out that new development should provide a net gain for biodiversity wherever possible.

Under the Environment Act 2021, it is a statutory requirement for the majority of planning applications to demonstrate that a minimum net gain of 10% is achieved.

6.103 Emerging Policy EN12 (Biodiversity and the Green Network) seeks to protect and enhance biodiversity assets and ecological networks, requiring development to avoid harm to ecological features, incorporate biodiversity enhancements and, where applicable, deliver a minimum 10% Biodiversity Net Gain.

6.104 A Preliminary Ecological Appraisal (PEA) has been undertaken in support of the proposed development. The assessment confirms that the site comprises existing buildings and sealed hardstanding within a highly urbanised town centre location, with no statutory designated sites, priority habitats, trees or other significant ecological features within the application boundary. The site is therefore considered to have negligible existing ecological value.

6.105 The PEA identifies the principal ecological considerations as relating to the potential presence of roosting bats and nesting birds within the existing buildings. Buildings B2a and B3a were assessed as having moderate suitability for roosting bats and further emergence surveys have been recommended. The buildings also provide potential nesting opportunities for birds, including swift and other urban species known to occur locally. Subject to the recommended survey work and mitigation measures, the PEA confirms that there are no ecological constraints that would preclude redevelopment of the site. The recommended surveys are currently being undertaken.

6.106 Whilst the site currently provides very limited ecological value, the proposals present a significant opportunity to enhance biodiversity and urban greening. The scheme incorporates a comprehensive landscape strategy centred around the creation of an attractive and functional courtyard environment, including tree planting, hedgerows, in-ground planting, raised planters and pocket gardens. These measures will improve visual amenity for future occupiers whilst contributing positively to biodiversity, urban cooling and climate resilience.

6.107 The development will also deliver a range of ecological enhancement measures consistent with the recommendations of the PEA.

6.108 In accordance with Emerging Policy EN19, an Urban Greening Factor Assessment has been prepared which demonstrates that the development achieves a UGF score of 0.25, meeting the Council's target for this form of development. The score is achieved through a combination of tree planting, native and ornamental planting, hedgerows, permeable paving and extensive green roof provision. Given the limited availability of ground-level open space across the site, the green roof proposals make a particularly important contribution towards delivering meaningful greening benefits.

- 6.109 The submitted ecological assessment concludes that the site is exempt from the statutory Biodiversity Net Gain regime as the redevelopment affects only existing buildings and sealed hardstanding, with no habitats being lost. Notwithstanding this position, the scheme will secure a clear ecological improvement through the introduction of new planting, green roof infrastructure and integrated biodiversity features.
- 6.110 The landscape proposals will be supported by a Landscape Management Plan to ensure the successful establishment and long-term maintenance of planting and green infrastructure. Collectively, the proposed landscaping, ecological enhancements and urban greening measures will transform a predominantly hard-surfaced brownfield site into a development that makes a positive contribution to biodiversity, environmental quality and urban greening. The proposals therefore accord with the objectives of Policy CC7, Emerging Policies EN12 and EN19, and the wider ecological and sustainability objectives of the Development Plan.

Energy and Sustainability

Energy, Sustainability and Whole Life Carbon

- 6.111 Policy CC2 requires development to reduce the use of energy, materials and natural resources and, for schemes such as this, achieve a BREEAM 'Excellent' rating. Policies CC3, CC4 and CC5 also require development to address climate change, consider low-carbon energy opportunities and reduce waste. The proposals are supported by an Energy and Sustainability Statement, TM54 Energy Assessment and Whole Life Carbon Assessment, which demonstrate compliance with these policy requirements.
- 6.112 The development has been designed to reduce energy demand from the outset. A fabric-first approach has been adopted, meaning that the building envelope has been designed to perform better than the minimum standards required by Building Regulations. This includes improved insulation, high-performance glazing, good airtightness, energy-efficient lighting and Mechanical Ventilation with Heat Recovery (MVHR) systems.
- 6.113 The development will be fully electric, with Air Source Heat Pumps (ASHPs) providing heating and hot water. There is currently no district heat network serving the site, although the proposed heating system has been designed to allow a future connection if one becomes available. Renewable energy will be generated through photovoltaic (solar) panels installed on the roof, with the available roof space used as efficiently as possible alongside green roofs and plant equipment.
- 6.114 The Energy Assessment demonstrates that the development will achieve a 24% reduction in regulated carbon emissions compared with the Part L 2021 Building Regulations baseline. The assessment also confirms that the building is expected to have a low operational energy demand, consistent with the objectives of emerging Policy CC2.
- 6.115 The proposals have been designed to be resilient to climate change. Measures to reduce overheating include carefully designed window sizes, opening windows, solar control glazing, high levels of insulation and efficient ventilation systems. Surface water drainage has also been improved through the use of green roofs, permeable surfaces and on-site storage, reducing runoff compared with the existing site.

- 6.116 The development also promotes sustainable living. Water-efficient fittings are expected to reduce water consumption by around 45% compared with a standard development. The site occupies a highly sustainable town centre location within walking distance of Reading Station and a range of public transport services. The development is car-free and provides secure cycle parking for residents and staff.
- 6.117 A Whole Life Carbon Assessment has been undertaken to understand the environmental impact of the development throughout its lifetime, including construction, operation and eventual replacement of building materials. The assessment demonstrates that carbon reduction has informed the design process and identifies opportunities for further improvements during detailed design and construction.
- 6.118 Emerging Policy CC2 requires demolition proposals to minimise waste and divert at least 95% of construction waste from landfill. The principle of redevelopment has already been established through the site's planning history. Nevertheless, the development commits to achieving at least 95% diversion of construction and demolition waste from landfill through effective recycling and waste management measures.
- 6.119 The Energy and Sustainability Statement confirms that the proposed co-living development is capable of achieving a BREEAM 'Excellent' rating. Whilst the scheme cannot achieve operational net-zero carbon entirely on site due to the limitations of a constrained town centre location and roof area, the design maximises energy efficiency, low-carbon heating and renewable energy generation as far as reasonably possible.
- 6.120 Overall, the proposed development complies with Policies CC2, CC3, CC4 and CC5 of the Reading Borough Local Plan by delivering a sustainable, energy-efficient and climate-resilient form of development.

Overheating and Climate Resilience

- 6.121 An Overheating Risk Assessment has been undertaken in accordance with Policy CC3 and Building Regulations Part O. The assessment confirms that the development has been designed to maintain comfortable internal temperatures during warmer weather.
- 6.122 The proposals include a range of measures to reduce overheating, including high-quality insulation, solar control glazing, opening windows and green roofs. Due to the town centre location and associated noise levels, all co-living units will also benefit from MVHR systems with air tempering to help maintain comfortable conditions.
- 6.123 Detailed modelling confirms that all co-living units meet the requirements of Building Regulations Part O. Shared amenity areas and circulation spaces have also been designed to provide a comfortable internal environment throughout the year.
- 6.124 The Overheating Risk Assessment concludes that the development will provide a healthy, comfortable and climate-resilient environment for future residents. The proposals therefore comply with Policy CC3 and support the wider sustainability objectives of the Development Plan.

Flood risk and drainage

- 6.125 Policy EN18 requires development to be directed to areas at the lowest risk of flooding and to incorporate Sustainable Drainage Systems (SuDS) where appropriate.
- 6.126 A Drainage and Flood Risk Report prepared by Ridge and Partners confirms that the site lies within Flood Zone 1 and is at a low risk of flooding from rivers, the sea, groundwater and other sources. The assessment concludes that the site is suitable for redevelopment, and that safe access and egress can be maintained during extreme flood events.
- 6.127 The proposed drainage strategy incorporates SuDS measures including green roofs, permeable paving and below-ground attenuation tanks. Surface water runoff would discharge to the existing surface water sewer at a restricted rate of 1.4 litres per second, representing a reduction of between 90% and 96% compared to the existing site. The drainage network has been designed to accommodate the 1 in 100-year storm event plus a 45% climate change allowance without flooding.
- 6.128 Overall, the submitted assessment demonstrates that flood risk can be appropriately managed and that the proposed drainage strategy would deliver significant betterment over the existing situation. The proposal therefore accords with Policy EN18 of the Reading Local Plan.

Fire Safety

- 6.129 The application is supported by a Fire Statement and Fire Engineering Review prepared by Jensen Hughes. The reports confirm that the development can be designed to achieve an appropriate standard of fire safety and comply with relevant Building Regulations requirements.
- 6.130 The building would incorporate comprehensive fire safety measures including sprinkler protection, automatic fire detection systems, smoke ventilation, protected stair cores, evacuation lifts and appropriate firefighting facilities. Fire service access would be provided directly from Friar Street.
- 6.131 Overall, the submitted fire strategy demonstrates that the development can provide a safe environment for future occupants and accords with relevant fire safety guidance and legislation.

Utilities

- 6.132 The application is supported by a Utilities Statement prepared by Innovo, which confirms that the site can be adequately served by the necessary utility infrastructure. Existing water, drainage, electricity and telecommunications networks are available in the vicinity of the site and no constraints have been identified that would prevent the development coming forward.
- 6.133 The development will be all-electric, with foul and surface water connections proposed to the existing sewer network. Capacity enquiries have been submitted to Thames Water and discussions with the relevant statutory undertakers will continue as the scheme progresses.
- 6.134 Overall, the Utilities Statement demonstrates that the necessary infrastructure can be provided to support the proposed development in accordance with the requirements of the Local Plan.

Land contamination

6.135 Given the historic commercial use of the site and the proposed residential development, there is potential for land contamination to be present. This matter was considered as part of the pre-application process, where officers advised that the issue could be appropriately addressed through planning conditions, consistent with the approach taken under the extant permission (PL/22/1235).

6.136 The Applicant would therefore accept the imposition of suitably worded conditions requiring site investigation, remediation (where necessary) and verification prior to occupation. Subject to compliance with those requirements, the site can be made suitable for its proposed use and the development would accord with Policy EN16 of the Reading Local Plan.

Summary

6.137 Overall, the proposed development accords with the adopted Development Plan and by the emerging Local Plan Partial Update. The scheme will secure the redevelopment of a sustainable brownfield site within Reading town centre, delivering high-quality purpose-built shared living accommodation in a highly accessible location.

6.138 The proposal will contribute towards housing delivery, support the vitality and viability of Reading town centre, retain and reactivate the locally listed Bugle Public House, and make effective use of previously developed land. Detailed technical assessments confirm that the development will provide a high standard of accommodation whilst preserving heritage significance and avoiding unacceptable impacts in respect of transport, noise, air quality, flood risk, ecology and other environmental considerations.

6.139 The scheme has also been designed specifically to meet the requirements of emerging Policy H15 for purpose-built shared living accommodation. As demonstrated in Appendix 1, the proposal complies with all elements of the policy, including location, unit sizes, communal facilities, management arrangements, security measures and affordable housing contributions.

6.140 Accordingly, the development represents sustainable development that accords with both the adopted and emerging development plan and will make a positive contribution to the continued regeneration of Reading town centre.

7. Material Planning Considerations

- 7.1 It is considered that the Proposed Development accords with the development plan when read as a whole. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning permission should therefore be granted unless material considerations indicate otherwise.
- 7.2 The material considerations identified in this section provide further support for the grant of planning permission. These include national planning policy, as set out within the National Planning Policy Framework ("NPPF"), the Council's current housing land supply position, and the significant social, economic and environmental benefits that would arise from the Proposed Development.
- 7.3 In the alternative, should the Council conclude that the Proposed Development does not accord with the development plan when read as a whole, these material considerations are nevertheless of sufficient weight to justify a grant of planning permission. In those circumstances, the proposal should be assessed having regard to the presumption in favour of sustainable development and the relevant provisions of the NPPF.
- 7.4 As demonstrated below, the Proposed Development would deliver substantial benefits. It is considered that these benefits significantly outweigh any identified adverse impacts. Accordingly, the material considerations weigh strongly in favour of granting planning permission.
- 7.5 The assessment below identifies the principal material considerations relevant to the determination of the application and the weight attributed to each. The weightings reflect the planning merits of the Proposed Development, the characteristics of the Site and its surroundings. The following gradations of weight are applied:
- Significant Weight
 - Moderate Weight
 - Limited Weight
 - No Weight

Previous consent

- 7.6 Significant positive weight should be afforded to the previous hotel planning permission. That consent established both the principle of development on the Site and the acceptability of buildings of a scale and massing materially greater than those proposed under the current application. The Proposed Development occupies the same broad development envelope but represents a noticeably reduced quantum of built form. As such, the previous permission provides a strong benchmark against which the current proposals can be assessed and lends significant support to the conclusion that the scale, height and massing of the Proposed Development are acceptable.

National Planning Policy Framework (NPPF)

Paragraphs 124 and 125(c)

- 7.7 The NPPF (2024) places significant emphasis on the effective use of land to meet development needs. Paragraph 124 explains that:

“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land” (underline added)

- 7.8 Furthermore, paragraph 125(c) of the NPPF explains that planning policies and decisions should:

“give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land” (underline added)

- 7.9 The Application Site comprises previously developed land within the urban area of Reading and represents a sustainable location capable of accommodating redevelopment. The Proposed Development would deliver a high-quality residential-led scheme on a brownfield site and would make efficient use of land in accordance with the objectives of the NPPF. The proposal would optimise the development potential of the Site whilst responding appropriately to its surroundings and delivering a range of social, economic and environmental benefits. In line with paragraph 125(c) of the NPPF, significant weight should therefore be afforded to the redevelopment of this brownfield site and the development should be approved unless substantial harm would be caused.
- 7.10 For all the reasons set out in this Planning Statement, and as further demonstrated below, the Proposed Development would deliver substantial public benefits and would not give rise to substantial harm. Paragraph 125(c) of the NPPF establishes a clear policy presumption in favour of the redevelopment of suitable brownfield land within settlements and confirms that such proposals should be approved unless substantial harm would be caused. In this case, no such substantial harm has been identified. Rather, the proposal would generate significant social, economic and environmental benefits which attract considerable weight in the planning balance and which significantly outweigh any minor adverse impacts. Accordingly, the objectives of paragraph 125(c) are fully satisfied and this consideration weighs strongly in favour of granting planning permission.
- 7.11 Having regard to the status of the Site as suitable brownfield land within a sustainable urban location, the strong support afforded by paragraph 125(c) of the NPPF, and the substantial benefits arising from the Proposed Development, this material consideration attracts significant positive weight in favour of granting planning permission

Paragraph 11

7.12 Policy H1 (as well as the whole of the local adopted local plan) of the Reading Borough Local Plan (2019) is now more than five years old and Reading Borough Council is currently unable to demonstrate a five-year supply of deliverable housing sites, with the Council's latest published position (from January 2026) identifying a supply of approximately 3.55 years. In accordance with footnote 8 to paragraph 11 of the NPPF, policies which are most important for determining applications for housing should therefore be regarded as out of date. Consequently, the presumption in favour of sustainable development set out at paragraph 11(d) of the NPPF is engaged.

7.13 In considering paragraph 11(d)(i), it is not considered that the application of policies within the NPPF that protect areas or assets of particular importance provides a strong reason for refusing the Proposed Development. The Site does not fall within the Green Belt, a National Landscape, National Park, Site of Special Scientific Interest or any other designation identified within footnote 7 of the NPPF. Furthermore, the supporting technical assessments submitted with the application demonstrate that the proposal would not give rise to any unacceptable effects in relation to flood risk, heritage, ecology, transport, residential amenity or other environmental considerations.

7.14 Accordingly, Paragraph 11(d)(ii), and the tilted balance, is therefore engaged. Paragraph 11(d)(ii) sets out that permission should be granted unless:

“Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

Scheme Benefits

Contribution to housing delivery

7.15 The Proposed Development would deliver a substantial contribution towards meeting housing needs within the urban area of Reading through the redevelopment of a previously developed site in a highly sustainable location. The proposal would accommodate up to 145 residents within a professionally managed co-living environment. Emerging planning policy recognises the contribution that co-living accommodation can make towards housing supply and applies a conversion ratio of four co-living units to one conventional dwelling. On this basis, the Proposed Development would be equivalent to approximately 36 additional homes.

7.16 The delivery of additional housing, particularly within a Borough experiencing acute housing pressures and a significant shortfall in deliverable housing land, attracts significant positive weight in the planning balance. The Proposed Development would make a meaningful contribution towards addressing identified housing needs, increasing housing choice and boosting housing delivery in accordance with national planning policy objectives.

Making effective use of brownfield land

7.17 Significant positive weight should also be attributed to the efficient redevelopment of a suitable brownfield site. Paragraph 125(c) of the NPPF requires substantial weight to be given to the value of using suitable brownfield land within settlements for homes and other identified needs and confirms that such proposals should be

approved unless substantial harm would be caused. The Application Site represents precisely the type of sustainable brownfield opportunity that national policy seeks to encourage.

Heritage and Townscape

- 7.18 Significant positive weight should be attributed to the heritage and townscape benefits arising from the Proposed Development. Whilst the proposal involves the partial demolition of the locally listed Bugle Public House, the Heritage and Townscape Statement concludes that any harm would be very limited and confined to later additions that make only a limited contribution to the significance of the asset.
- 7.19 The scheme would secure the long-term retention, restoration and active reuse of the most significant elements of The Bugle, ensuring the continued preservation of its historic and communal value. In addition, the redevelopment would enhance the quality of the surrounding townscape through the replacement of buildings of limited heritage value with a high-quality contemporary building and the regeneration of Fife Court.
- 7.20 Collectively, these heritage and townscape benefits attract significant positive weight in favour of granting planning permission.

Active Frontage and Town Centre Vitality

- 7.21 Significant positive weight should be attributed to the contribution the Proposed Development will make towards the vitality and viability of Reading town centre. The Site is currently characterised by vacant or underutilised buildings that make a limited contribution to the economic performance, attractiveness or activity of this part of Friar Street. The redevelopment of the Site therefore presents an opportunity to replace underperforming buildings with an active and productive town centre use, delivering tangible real-world benefits for the surrounding area.
- 7.22 The Proposed Development will introduce a substantial resident population into a highly sustainable and accessible town centre location, increasing footfall and supporting local shops, cafés, restaurants, public houses, leisure facilities and other services throughout the day and evening. This will be complemented by active ground-floor frontages, including communal amenity space, co-working facilities, the principal building entrance and the retained commercial unit within the former Bugle Public House, creating activity, natural surveillance and visual interest along Friar Street.
- 7.23 In contrast to the existing situation, where parts of the Site are vacant or underused, the scheme will bring the Site back into active use and generate sustained economic activity and expenditure within the town centre. The resultant increase in occupation, footfall and spending power will support the resilience of local businesses and contribute positively to the ongoing regeneration of central Reading.
- 7.24 Accordingly, the transformation of a vacant and underutilised site into an active, occupied and economically productive development represents a significant public benefit that attracts significant positive weight in favour of granting planning permission.

Energy, Sustainability and Whole Life Carbon

7.25 Moderate positive weight should be attributed to the energy, sustainability and climate resilience benefits of the Proposed Development. The scheme adopts a fabric-first approach, utilises Air Source Heat Pumps and rooftop solar panels, and achieves a 24% reduction in regulated carbon emissions compared to the Part L 2021 baseline.

7.26 The development has also been designed to be resilient to climate change through the incorporation of green roofs, sustainable drainage measures, water efficiency measures and overheating mitigation. It is capable of achieving a BREEAM 'Excellent' rating and has been informed by a Whole Life Carbon Assessment.

7.27 Collectively, these measures represent a clear environmental benefit and attract moderate positive weight in favour of granting planning permission.

Improvement to Biodiversity, landscaping and Urban Greening

7.28 Significant positive weight should be attributed to the biodiversity and urban greening benefits arising from the Proposed Development. The landscape proposals will be supported by a Landscape Management Plan to ensure the successful establishment and long-term maintenance of planting and green infrastructure.

7.29 Collectively, the proposed landscaping, ecological enhancements and urban greening measures will transform a predominantly hard-surfaced brownfield site into a development that makes a positive contribution to biodiversity, environmental quality and climate resilience. The proposals will increase planting across the Site, enhance habitat opportunities for wildlife and improve the overall environmental quality of the Site and its surroundings.

7.30 These enhancements represent a clear environmental benefit of the Proposed Development and weigh positively in the planning balance.

Employment and wider economic benefits

7.31 Significant positive weight should be attributed to the employment and wider economic benefits arising from the Proposed Development. The accompanying Economic Benefits Statement demonstrates that the scheme will support approximately 159 construction jobs, including 90 jobs within Reading Borough, together with 12 apprenticeships and £12.6 million of GVA during the construction phase.

7.32 Once operational, the development is expected to generate around £4.5 million in annual local expenditure, support 13 direct and indirect jobs, and contribute approximately £6.8 million of GVA per annum to the local economy.

7.33 These benefits represent a substantial economic contribution to Reading and therefore attract significant weight in favour of granting planning permission

CIL Contributions

7.34 Significant positive weight should be attributed to the Community Infrastructure Levy ("CIL") contribution generated by the Proposed Development. The scheme is expected to deliver a CIL contribution of approximately £591,199.20, providing substantial funding towards infrastructure investment and improvements within Reading Borough. This represents a significant public benefit and therefore attracts significant weight in favour of granting planning permission.

Car and cycle parking

7.35 Limited positive weight should be attributed to the sustainable transport benefits of the Proposed Development. The scheme is proposed as a car-free development in a highly accessible town centre location approximately 300 metres from Reading Station and within easy walking distance of a wide range of services, facilities and public transport connections. The development will also provide 56 secure cycle parking spaces and will be supported by a Framework Travel Plan to encourage sustainable travel choices.

7.36 The Proposed Development will reduce reliance on the private car and promote walking, cycling and public transport use. These environmental benefits weigh positively in the planning balance and attract limited positive weight in favour of granting planning permission.

Scheme disbenefits

7.37 Turning again to part ii of paragraph 11 (d), the disbenefits of the proposed scheme are set out below.

Loss of Existing Class E and Sui Generis Floorspace

7.38 Limited negative weight should be attributed to the loss of the existing Class E and Sui Generis floorspace currently present on the Site. Whilst the proposal will result in the redevelopment of these uses, it is important to recognise that the existing buildings are vacant and underutilised and therefore make a limited contribution to the vitality, viability and economic performance of Reading town centre.

7.39 The loss of the existing floorspace is further mitigated by the retention of a commercial unit within the former Bugle Public House and the significant economic, social and town centre benefits arising from the Proposed Development. The scheme will bring the Site back into productive use, introduce a substantial resident population, increase footfall and expenditure within the town centre, and deliver active frontages that will contribute positively to the vitality and attractiveness of Friar Street.

7.40 Accordingly, whilst the loss of the existing Class E and Sui Generis uses is acknowledged, any associated harm is limited and is significantly outweighed by the benefits arising from the comprehensive redevelopment of the Site. This matter therefore attracts limited negative weight in the planning balance.

Environmental and Embodied Carbon Impacts of Demolition of Existing Buildings

7.41 Limited negative weight should be attributed to the environmental and embodied carbon impacts associated with the demolition of the existing buildings. However, this harm is reduced to limited level by the commitment to divert at least 95% of construction and demolition waste from landfill through reuse and recycling measures

7.42 In addition, the Proposed Development will deliver a significantly more energy-efficient and environmentally sustainable building than the existing structures on the Site, resulting in lower operational carbon emissions and improved environmental performance over its lifetime. The short-term embodied carbon impacts associated with demolition are therefore substantially offset by the long-term sustainability benefits of the replacement development.

7.43 Accordingly, whilst the loss of embodied carbon within the existing buildings is acknowledged, this consideration attracts only limited negative weight in the planning balance.

Conclusion on material considerations

7.44 The material considerations relevant to the Proposed Development provide substantial support for the grant of planning permission. As set out within this Planning Statement, it is considered that the Proposed Development accords with the Development Plan when read as a whole and should therefore be approved in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.

7.45 In addition, the material considerations identified above weigh strongly in favour of the Proposed Development. These include the strong support within the National Planning Policy Framework for the efficient redevelopment of suitable brownfield land, the contribution the scheme would make towards addressing Reading's housing needs in the context of the Council's inability to demonstrate a five-year supply of deliverable housing sites, and the significant social, economic and environmental benefits arising from the proposal.

7.46 Alternatively, should Reading Borough Council conclude that the Proposed Development does not accord with the Development Plan when read as a whole, these material considerations are nevertheless of sufficient weight to justify the grant of planning permission. In those circumstances, the presumption in favour of sustainable development set out in paragraph 11(d) of the NPPF is engaged. Having regard to the benefits identified, it is considered that any adverse impacts associated with the Proposed Development would not significantly and demonstrably outweigh its benefits when assessed against the policies of the NPPF taken as a whole.

7.47 Accordingly, whether assessed against the Development Plan or through the application of the presumption in favour of sustainable development, the planning balance falls decisively in favour of the Proposed Development and planning permission should be granted.

8. Summary and Conclusion

8.1 This Planning Statement has been prepared in support of a full planning application for:

"Phased redevelopment of the site involving the demolition of Nos. 138-141 and 142-143 Friar Street, partial demolition of No. 144 Friar Street, and erection of a basement and 6-storey building to provide co-living residential accommodation (purpose-built shared living accommodation - Sui Generis use class), together with the partial retention of the former Bugle Public House as a standalone Class E (Classes E(a)-E(e)) commercial unit."

8.2 The Proposed Development represents the sustainable redevelopment of a highly accessible brownfield site within Reading town centre. It will bring a prominent but underutilised site back into productive use, deliver high-quality purpose-built shared living accommodation, secure the retention and reuse of the locally listed Bugle Public House and contribute positively to the vitality, viability and continued regeneration of central Reading.

8.3 The assessment contained within this Planning Statement demonstrates that the Proposed Development accords with the Development Plan when read as a whole. The proposal would deliver a high-quality and professionally managed co-living scheme that responds positively to Reading's housing needs whilst supporting the vitality and viability of the town centre. The development has been carefully designed to respect its townscape and heritage context and would secure the long-term retention, restoration and active reuse of the locally listed Bugle Public House.

8.4 The supporting technical assessments confirm that the proposal would not give rise to any unacceptable impacts in relation to design, heritage, transport, highway safety, flood risk, drainage, ecology, biodiversity, air quality, noise, sustainability or other environmental matters. Where appropriate, any outstanding matters can be satisfactorily addressed through the imposition of planning conditions.

8.5 The Proposed Development would deliver substantial public benefits, including the provision of accommodation for up to 145 residents in a highly sustainable town centre location, a meaningful contribution towards Reading's housing supply, the effective redevelopment of a suitable brownfield site, the restoration and long-term reuse of the locally listed Bugle Public House, significant employment and economic benefits, increased footfall and expenditure supporting local businesses, a substantial Community Infrastructure Levy contribution, biodiversity and urban greening enhancements, and high standards of environmental sustainability and energy efficiency.

8.6 The proposal also comes forward in the context of Reading Borough Council's inability to demonstrate a five-year supply of deliverable housing sites. Accordingly, the strong support within the National Planning Policy Framework for housing delivery, the efficient use of brownfield land and sustainable development attracts significant weight in favour of the Proposed Development.

8.7 Having regard to the Development Plan, the National Planning Policy Framework and all other relevant material considerations, it is clear that the planning balance falls decisively in favour of the Proposed Development. The scheme represents a sustainable, high-quality and deliverable form of development that will make a significant positive contribution to Reading town centre. Accordingly, planning permission should be granted.

Appendix 1 - Emerging Policy H15 (Purpose-Built Shared Living Accommodation)

Whilst the adopted Reading Local Plan does not contain a specific policy relating to co-living accommodation, emerging Policy H15 provides a clear framework for assessing purpose-built shared living developments. The proposed development has been designed in accordance with the policy's requirements and incorporates appropriately sized residential units, extensive communal facilities, comprehensive management arrangements and an affordable housing contribution. The site is located within Reading town centre and therefore aligns with the spatial strategy established by the emerging policy. Compliance with each criterion of Policy H15 is demonstrated in the table below.

Full Policy Wording	Compliance and Justification
It is located on a site that has not been identified for general residential (as plan allocations or extant permissions), unless the purpose-built shared living accommodation element would be in addition to the planned residential.	Complies. The application site is not allocated for general residential development within the adopted Reading Local Plan and does not benefit from an extant planning permission for residential use. The most recent planning permission related to a 163-bedroom hotel development. The proposal therefore accords with the locational requirements of Policy H15.
It is located within the town centre or a 15-minute walk of the town centre, unless a clear justification for an alternative location is provided.	Complies. The site is located within Reading town centre, within the Central Reading area, Primary Shopping Area, Central Core and Office Core. It lies approximately 300 metres from Reading Railway Station and is surrounded by a wide range of employment, retail, leisure and community facilities. The development is therefore located within the most sustainable location in the Borough and fully accords with the locational requirements of Policy H15.
It provides units for rent with minimum tenancy lengths of no less than three months.	Complies. The proposed development will be operated as a professionally managed co-living scheme under a single management structure. The submitted Co-Living Management Plan confirms that accommodation will be provided on a rental basis and managed through formal tenancy arrangements. A minimum tenancy period of not less than three months will be secured through the Management Plan and Section 106 Agreement.
High quality, and well-placed on-site communal facilities and services are provided that are sufficient to meet the requirements of, and available to and easily accessible by, all residents of the proposal. At least 4 sq m of internal communal space will be provided per resident, decreasing to 3 sq m per resident where there would be more than 100 residents, which includes common work areas but excludes circulation space such as corridors and stairways. On-site communal facilities will offer at least: • Communal kitchen and dining facilities • Laundry and drying facilities	Complies. The scheme provides 145 co-living units and is therefore required to provide a minimum of 3sqm of communal space per resident. The Planning Statement confirms the provision of approximately 450sqm of internal communal space, meeting the emerging standard. These facilities include co-working areas, resident lounges, communal kitchen and dining spaces, fitness and recreational facilities and resident support areas. The Management Plan confirms the provision of concierge services, cleaning and maintenance arrangements, security measures and professional management. The communal facilities have been integrated into the building layout to ensure convenient access for all residents.

• A concierge • Cleaning, maintenance and security services	
The private units have an internal size of at least 18sqm, include a bathroom with shower, and are not capable of being used as self-contained dwellings.	Complies. All co-living units exceed the minimum size required by Policy H15, with each unit providing a minimum of 20sqm GIA. The scheme also includes 12 accessible units of approximately 26.7sqm. Each unit includes an ensuite bathroom with shower facilities and the accommodation has been designed as co-living accommodation rather than self-contained residential dwellings, with residents reliant upon and benefiting from the comprehensive communal facilities provided throughout the development.
It is under a single management regime.	Complies. The development will operate under a single management structure overseen by a specialist co-living operator. The submitted Management Plan prepared by VervLife confirms comprehensive operational management arrangements covering tenancy management, concierge services, maintenance, resident engagement, security and building management.
The proposal is accompanied by a management plan, secured by Section 106 agreement, which demonstrates how the development, including the communal facilities, will be managed and maintained over its lifetime.	Complies. The application is supported by a Co-Living Management Plan prepared by VervLife. The document provides details relating to tenancy management, resident wellbeing, community-building initiatives, maintenance, cleaning, waste management, security arrangements, complaints procedures and building operation. The Management Plan can be secured through the Section 106 Agreement to ensure compliance throughout the lifetime of the development.
The proposal is accompanied by a security strategy, provided at planning application stage and secured by condition or Section 106 agreement, setting out how crime and anti-social behaviour will be mitigated through design and management measures.	Complies. The Management Plan, as well as the Design and Access Statement, confirms that the development will incorporate a comprehensive security strategy including CCTV coverage, secure access control systems, concierge services, on-site management, controlled resident access and 24-hour management arrangements. These measures will minimise opportunities for crime and anti-social behaviour and can be secured by planning condition or legal agreement as required by Policy H15.
A contribution is made to provision of affordable housing at an equivalent level to policy H3. This will form an off-site financial contribution, unless on-site self-contained affordable dwellings can be provided that do not rely on, and operate independently from, the internal communal facilities.	Complies. The application is supported by a detailed Financial Viability Assessment, which demonstrates that the scheme cannot viably support an affordable housing contribution. In accordance with adopted Policy H3 and emerging Policy H15, the justification for a reduced contribution has been provided through an open-book viability appraisal



Shaping *Property*, Built on *Trust*

We take care to consider our credentials and charge rates and have structured this proposal based on the project specifically with commercially sensitive information. We request that these be treated as confidential. Registered number: OC356464 Daniel Watney LLP, a wholly owned subsidiary of Daniel Watney LLP is also registered in England & Wales at the same address, registration number OC356464 is authorised and regulated by the Financial Conduct Authority (FCA).

