

08 October 2025



PLANNING APPLICATION REPORT	
Ward	Katesgrove
Planning Application Reference:	PL/24/1155
Site Address:	John Lewis Customer Collection Point, Crossland Road, Reading, RG1 2HT
Proposed Development	Demolition of the existing building and redevelopment of the site comprising erection of a new building for 170 build to rent residential dwellings (Use Class C3) together with flexible community space (Use Class F1 (a-b and c-d), F2 (a – b)), and residents' facilities, landscaping, public realm, amenity space and cycle parking. (Amended description)
Report author	Anthony Scholes
Applicant	John Lewis Partnership BTR Ltd
Deadline:	31 October 2025 (agreed extension of time)
Recommendations	<p>Subject to:</p> <ol style="list-style-type: none">Confirmation of satisfactory details of the operation of the Deferred Payment Mechanism (DPM) terms; andSustainability details including feasibility of connecting to the Heat Network; andConfirmation from the Local Lead Flood Authority that SuDS issues are satisfactory <p>Delegate to the Assistant Director of Planning, Transport and Public Protection Services (ADPTPPS) to:</p> <p>i) GRANT full planning permission, subject to the satisfactory completion of a s106 legal agreement and delegate to ADPTPPS to make such minor changes to conditions or such additional conditions required, make such minor changes to Heads of Terms and details of the legal agreement as may be reasonably required to issue the permission; or</p> <p>ii) Refuse full planning permission if the legal agreement is not completed by 31/10/2025 (unless officers on behalf of the Assistant Director of Planning, Transport and Public Protection Services agree to a later date for completion of the legal agreement)</p>
S106 Heads of Terms: 1. Affordable Housing (LHA)	Not less than 17 units (10% of the total) affordable housing units to be provided on site at Local Housing Allowance Rent levels , capped at the lower of 80% Market Rent or LHA or equivalent, inclusive of service charges.

	<p>Delivery of affordable housing units as per revised affordable housing delivery plan supplied on 23/9/25), i.e.:</p> <ul style="list-style-type: none"> • Not less than 1 affordable housing units to be provided at ground floor before any BTR (non-affordable) units provided on that floor. • Not less than 5 affordable housing units to be provided on first floor before any BTR (non-affordable) units provided on that floor. • Not less than 3 affordable housing units to be provided on second floor before any BTR (non-affordable) units provided on that floor. • Not less than 3 affordable housing units to be provided on third floor before any BTR (non-affordable) units provided on that floor. • Not less than 3 affordable housing units to be provided on fourth floor before any BTR (non-affordable) units provided on that floor. • Not less than 2 affordable housing units to be provided on fifth floor before any BTR (non-affordable) units provided on that floor. • Overall mix of affordable housing units to match the overall dwelling mix (7x 1-bed; 6x 2-bed; 4x 3-bed) <p>Affordable housing to be supplied at no more than LHA rent levels in perpetuity in accordance with Policy H4.</p> <p>(policies: CC9, H3, H4, Affordable Housing SPD)</p>
<p>2. Affordable Housing (DMR)</p>	<p>Not less than 10 units (5.88% of the total) affordable housing units to be provided on site at Discount Market Rent levels, capped at 80% of Market Rent, inclusive of service charges.</p> <p>Delivery of affordable housing units as per revised affordable housing delivery supplied on 23/9/25), ie:</p> <ul style="list-style-type: none"> • Not less than 1 affordable housing units to be provided at ground floor before any BTR (non-affordable) units provided on that floor. • Not less than 1 affordable housing units to be provided on first floor before any BTR (non-affordable) units provided on that floor. • Not less than 2 affordable housing units to be provided on second floor before any BTR (non-affordable) units provided on that floor. • Not less than 1 affordable housing units to be provided on third floor before any BTR (non-affordable) units provided on that floor. • Not less than 2 affordable housing units to be provided on fourth floor before any BTR (non-affordable) units provided on that floor. • Not less than 3 affordable housing units to be provided on fifth floor before any BTR (non-affordable) units provided on that floor. • Overall mix of affordable housing units to match the overall dwelling mix (5x 1-bed; 4x 2-bed; 1x 3-bed) on that floor. <p>Affordable housing to be supplied at no more than 80% market rent levels in perpetuity in accordance with Policy H4.</p> <p>(policies: CC9, H3, H4, Affordable Housing SPD)</p>

<p>3. Build to Rent Restrictions</p>	<ul style="list-style-type: none"> • All Affordable units to be identified on plan to be attached to S106 agreement [prior to permission]. No future changes other than as agreed in writing by the LPA in the submission of an annual monitoring report. • Affordable Housing Covenant period –In the event of a change from Build to Rent tenure, which includes changes to affordable units, the affected units to be offered for sale to a Registered Provider and the Council. A fair market price must be offered for the proposed affordable private housing (or equivalent). In the event that an RP or the Council do not take control of the units an equivalent financial contribution shall be made to the Council to enable AH provision elsewhere in the Borough to be determined by a mutually agreed valuation, or arbitration. • In the event that in the initial 20 year period from Practical Completion, the owner of a build to rent development notifies the Council that it intends to sell or otherwise transfers some or all of the units so that they no longer qualify as build to rent the owner/operator shall provide a valuation of the Build to Rent accommodation immediately prior to the sale/transfer and a valuation of the value following the change to non-Build to Rent. A financial contribution equal to 30% of the increase in value shall be paid to the Council within 3 months of sale/transfer, subject to indexation, and the value achieved for the unit(s) converted to market sale. • Service charges – All rents to be inclusive of service charge but exclusive of utility bills and council tax and 'pay for' services - hire of function room etc. <p><i>Nominations and Lettings – Discounted Market Rent (LHA)</i></p> <p><i>First Lets:</i></p> <ul style="list-style-type: none"> • Either a typical unit, show apartment or the marketing suite will be made available for viewings • Three months before Practical Completion, the Council will be notified of expected date units will be available. • The "Marketing Period" will start two months before Practical completion and the Landlord will provide information on rents, specification, floor plans and management details. • For the first 4 weeks of the Marketing Period the affordable homes will be exclusively marketed to Council nominees, and the following will apply: <ul style="list-style-type: none"> • The Council has 10 working days to advertise the properties. This includes arranging viewing days for Applicants; • The Council then has 5 working days to confirm eligibility of the Applicants against the 'Qualifying Criteria' and then nominate those Applicants to the Landlord; • Subject to appropriate checks by the Landlord that the Qualifying Criteria has been met, Applicants will have then have 2 working days to confirm if they wish to take the property. • If the Landlord considers that the Qualifying Criteria has not been met, they will notify the Council who will be granted an additional 2 working days to nominate an alternative Applicant for this particular property. • Where more than one Applicant (all of whom pass the qualifying criteria) wants the same property, priority will be as per the Priority Hierarchy: <ol style="list-style-type: none"> 1. Households on the Council's Housing Waiting List
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- 2. Households where at least one person both lives and works in the Borough
- 3. Households where at least one person either lives or works in the Borough
- 4. Households where at least one person lives or works in a neighbouring local authority
- 5. All other unrestricted household.

- After the initial 4-week period, any remaining available affordable homes can be marketed by both the Council and the Landlord.
- Within this period the Council may still nominate Applicants, however priority will be determined on a first come first served basis, subject to the Qualifying Criteria being met.

Subsequent Lets:

- Existing residents will provide 2 months' notice of their intention to activate a break clause, at which point the property can be marketed.
- As above, for the first 4 weeks of any marketing period for subsequent lets of the affordable homes will be ring fenced to Council nominees.

Qualifying Criteria for all tenants

- 1. Can afford the rents proposed and pass affordability checks (to be defined in the agreement) [affordability to include money provided through the benefits system] and
- 2. Are an appropriate household size for the available property (to be defined in the agreement) and
- 3. Suitable references & credit checks (to be defined in the agreement) and
- 4. Have no rent arrears or history of rent arrears and
- 5. No history of anti-social behaviour (to be defined in the agreement) and
- 6. Satisfactory face-to-face interview with the Landlord's representative (to be defined in the agreement)

Management Strategy:

3 months before Practical Completion the Landlord to submit a Management Strategy to the Council for approval (not to be unreasonably withheld) to include the following:

- Details of the individual monthly rent and service charge (noting that all rents are inclusive of service charges) and
- Management, maintenance and servicing arrangements for the affordable units/ occupiers (e.g. on-site presence hours, bin disposal, visitor parking etc)
- Details as to how the affordable homes will be marketed to prospective occupiers (for both first and subsequent lettings) and the different forms of media proposed to be used.
- No dwelling to be occupied in any part of the development until the Strategy has been approved in writing by the Council. No dwelling to be occupied other than in accordance with the approved Strategy.

In accordance with Policy H4.

General Build to Rent Provisions

- 20 year minimum as BTR from Practical Completion.
- Subject to legislative changes, assured shorthold Tenancies (ASTs) offered at 3 years in length. Tenants may opt for shorter

	<p>tenancy. Include 6 month tenant-only, no fee, break clause (2 month notice). [as per NPPG guidance]. Unless otherwise agreed in writing by the LPA.</p> <ul style="list-style-type: none"> - Annual statement to RBC, confirming the approach to letting the affordable units, their ongoing status, and clearly identifying how the scheme is meeting the overall affordable housing level required in the planning permission. [as per NPPG Paragraph: 006 Reference ID: 60-006-20180913] - All tenancies shall include provisions enabling all residents to have the right to access and use the Communal Facilities within all residential areas, subject to reasonable management requirements and for the avoidance of doubt the charges and other terms of use shall be the same for all residents (regardless of tenure). - To provide and manage the Communal Facilities for the lifetime of the development. Except where alternative amenity facilities of equivalent effect and a timetable for their provision and arrangements for their management have been agreed in writing by the Local Planning Authority AND no earlier than the expiration of 20 years from Practical Completion. - Definition and demarcation of all communal facilities on plans. Clarification of nature/function of each to be included in the s106 agreement. <p>(Policy H4)</p>
4. Affordable Housing: Deferred payment mechanism	<p>The provision of affordable housing (via a commuted sum to go towards affordable housing elsewhere in the Borough), subject to a Deferred Payment Mechanism (DPM) to potentially increase the overall provision to a maximum of equivalent 30% policy compliance. (Details of an agreed arrangement to be supplied in the Update Report).</p>
5. Open space contribution	<p>On commencement, a financial contribution of £60,000 towards off-site works to improve nearby open space, to be undertaken by Council.</p> <p>(Policy EN9)</p>
6. Local Healthcare Infrastructure	<p>On commencement, a financial contribution towards local healthcare provision of £146,880.</p> <p>(Policy H9)</p>
7. Transport	<ul style="list-style-type: none"> • Highways improvement works, consisting of (i) entering into an agreement under s278 of the Highways Act for reggrading part of Crossland Road; and (ii) contribution of £5,000 per TRO towards a Traffic Regulation Order (TRO) for the applicant to secure the necessary highways marking/Order changes to Crossland Road, to include on-street parking changes, and closure of redundant crossover with reinstatement of kerb. • To provide details of a car club for one vehicle on Crossland Road, for a period of not less than five years following practical completion. Provision no later than first occupation.

	<ul style="list-style-type: none"> • A highway works agreement to maintain landscaping over highways land (section 142 of the Highways Act) • Removal of two high mast lighting columns and replacement with numerous lighting columns along the IDR (section 278) • Stopping up of part of the highway under section 247; • Revision to the highway extent to the east of the site via s278 agreement <p>Policies CC9, TR1, TR3, TR5, Revised Parking and Design SPD</p>
8. Employment, skills and training	Employment, Skills and Training - The production, implementation and monitoring of an Employment and Skills Plan (ESP) for both the construction and end use phases of the development. or, in the event that the developer chooses not to provide the ESP themselves, financial contribution commuted sums for the two phases, calculated using the Employment, Skills and Training SPD 2013 formula will be secured in lieu of an ESP
9. Zero-carbon homes offset	Zero Carbon Offset financial contribution , as per the Sustainable Design and Construction SPD 2019. If zero carbon is not achieved the scheme must instead achieve a minimum of a 35% improvement in regulated emissions over the Target Emissions Rate in the 2013 Building Regulations, plus provide a financial contribution of £1,800 per remaining tonne towards carbon offsetting within the Borough (calculated as £60/tonne over a 30-year period).
10. Monitoring, etc costs/other	<p>£8,000 s106 monitoring cost plus any viability review fees.</p> <p>Applicant to pay the Council's reasonable legal costs in preparing the s106 agreement (whether or not the s106 proceeds to completion) to an agreed maximum value.</p>
Conditions	<ol style="list-style-type: none"> 1. Time Limit for implementation – 3 years. 2. Approved plans. 3. Pre-commencement, barring demolition works, details of all external materials (including samples of bricks, and including on-site sectional mock-up, and local artist created patterned louvres) to be submitted and approved (including implementation) 4. * Pre-commencement Demolition and Construction Method Statement (also including Environmental Protection measures) 5. * Pre-commencement biodiversity enhancement scheme (minimum 15 bat boxes, 15 bird boxes, and wildlife friendly landscaping) 6. * Pre-commencement contaminated land assessment 7. * Pre-commencement contaminated land remediation scheme 8. Pre-construction implementation of approved remediation scheme 9. Reporting of any unexpected contamination 10. * Pre-commencement archaeological desk-study, and written scheme of investigation 11. Implementation of approved archaeological written scheme of investigation 12. Pre-commencement, barring demolition, submission and approval of hard and soft landscaping scheme details.

13. Pre-commencement, barring demolition, landscape management plan
14. *Pre-commencement, barring demolition, Sustainable Drainage Strategy details
15. Pre-commencement, barring demolition, Security Strategy details to be submitted and approved
16. Pre-commencement, barring demolition, full Fire Strategy details to be submitted and approved
17. Pre-commencement, barring demolition, noise mitigation scheme (internal) to protect dwellings from noise emissions from non-residential use at ground floor
18. Pre-commencement, barring demolition, submission and approval of a ventilation strategy to mitigate overheating (based on the recommendations of the already submitted acoustic assessment)
19. Pre-occupation boundary treatments details (to be approved) including implementation
20. Pre-occupation of any residential dwelling, submission and approval of details of 9 'wheelchair accessible' units.
21. Pre-occupation of any residential unit SAP assessment (energy) – as built, in relation to the new build dwellings
22. Pre-occupation of a) any residential unit b) community use (F1/F2) unit implementation of cycle parking
23. Pre-occupation of any residential unit, submission and approval of visitor cycle parking management plan and details
24. Pre-occupation submission and approval of a moving in / moving out management plan
25. Pre-occupation submission and approval vermin proof bin measures detailed by Environmental Protection.
26. Pre-occupation provision of refuse stores, and secure implementation of waste management strategy (compliance condition)
27. Hours of deliveries and waste collection (same as hours of use) (compliance condition)
28. Noise Assessment approved prior to installation of any additional mechanical plant
29. No flat roof area to be used as a balcony or roof garden unless where already stated / shown (compliance condition)
30. Provision and maintenance of active window frontage along Mill Lane and Crossland Road at ground floor level (compliance condition).
31. Ground floor community use unit to be used solely for Class F1 (a), (b), (d), or (e); or F2 (a), (b) uses only (compliance condition)
32. Hours of use of community use unit of 06:00-23:30 Monday-Saturday and 06:00 – 22:30 on Sundays/Bank Holidays (compliance condition)
33. Noise mitigation scheme (as specified) (compliance condition)
34. Demolition/Construction hours (compliance condition)
35. Mix of units restricted to 79 x 1-bedroom, 81 x 2-bedroom and 10 x 3-bedroom residential units.
36. Parking Permits 1 (pre-occupation)
37. Parking Permits 2 (compliance condition)
38. Vehicle Loading facilities (as specified) (compliance condition) –

	<p>39. Pre-occupation of residential, submission and approval of photovoltaics details.</p> <p>40. No burning of materials on site during demolition/construction (compliance condition)</p>
Informatives	<ol style="list-style-type: none"> 1. Biodiversity Net Gain – 10% applies to permission 2. Positive and Proactive Working – approval 3. Pre-commencement conditions 4. Highways 5. S106 Legal Agreement 6. Terms and conditions 7. Building Regulations 8. Complaints about construction 9. Encroachment 10. Noise between residential properties – sound insulation 11. Community Infrastructure Levy 12. Parking Permits 13. No advertisement consent granted – separate consent may be required in the future 14. Thames Water recommended informative 15. Royal Berkshire Fire Service informative

1. Executive summary

- 1.1. Full planning permission is sought for the demolition of all existing buildings at the site and the erection of a five to eight-storey building to accommodate 170 build to rent residential units, including the provision of 17 dwellings (10%) on-site affordable housing (10% LHA) and 10 units as discount market rent (6% DMR), together with a flexible use unit at ground floor level.
- 1.2. The proposals have been carefully considered by your officers and have been subject to a series of changes since the application was originally submitted. Whilst there are some shortcomings associated with the proposed development, predominantly as a consequence of its height and scale, resulting in impacts on daylight/sunlight to neighbours, and within the development itself. The many benefits of the proposals are considered to ultimately outweigh any harmful impacts. In particular, the on-site provision of affordable housing, the s106 terms suggested above, provision of cycle parking and wheelchair user dwellings are all tangible benefits, as well as the use of a suitable brownfield land for housing. Furthermore, the overarching architectural quality of the schemes design assists in overcoming shortfalls in scale. Accordingly, planning permission is recommended to be granted subject to conditions and the completion of a s106 legal agreement.

2. Introduction and site description

- 2.1. This application has been presented to committee as a Major planning application. Members of the Committee, and Ward Councillors (Abbey and Katesgrove) attended an accompanied Member site visit on 1st October, and 2nd October.
- 2.2. The area in which the proposal is situated is on the edge of the Market Place/London Street Conservation Area (figure 1 below – right). The site sits across the IDR from a large commercial car park associated with the Oracle shopping centre which at its nearest point is separated by ~35m from the application site.



Figure 1 - Site Location Plan; and Location relative to the Conservation area

- 2.3. The application site is located within the Reading Central Area. However, in practice the site is outside of the Central Core, which is encircled by the IDR. The area is highly urbanised, however is not as dense as the area across the IDR. The IDR is a key wayfinding and landmark feature of Reading, albeit an unfortunate modern intervention to the town. The site has excellent transport links via multiple modes of transport including high frequency bus routes north-south along Southampton Street, and London Street, and is a short walk from a larger number of bus routes which traverse the town centre and walkable to Reading Station.
- 2.4. There are some taller buildings within fringe locations, though there are no tall buildings within this area. The pattern of this area is a tighter grain and more human scale environment which differs in both feel and function from the north side of the IDR. To the north, the IDR ramp to the Southampton Street overpass is single-storey in height, with a

raw concrete presence that stands out as a harsh urban addition as viewed from the site. To the west, is the Premier Inn hotel at four-storeys which steps up toward a feature element at the corner at seven-storeys, though this appears to contain the lift overrun only. To the south, Saxon Court containing a number of flats is a three-storey building with basement parking, resulting in a four-storey overall height. Townsend House which is specialist residential accommodation extends over three-storeys. Church Street, a notable link from St Giles' Church to London Street, contains the Quaker's Meeting House, with a large garden and burial ground which extends to Crossland Road. It is noted that the opposite corner to the Central Club along London Street contains a modern five-storey building. Between the Premier Inn and the landmark St Giles Spire, sits a two/three-storey modern flatted development partly with undercroft parking (Deansgate Court).

- 2.5. The Market Place/ London Street Conservation Area appraisal (2007) describes London Street as: *"In the late 18th and 19th century, London Street was one of the fashionable parts of town and many of the elegant houses which lined either side of the road still survive. Though altered, no longer in residential use and devoid of their spacious rear gardens".* The properties are an eclectic mix of styles and forms which gives significant visual interest to those viewing the street as it makes its way up hill to the south. The buildings, though varying in form and style, are generally constructed over three-storeys, with the maximum height of buildings of four-storeys.
- 2.6. The existing building on the application site is a 1980s warehouse building of two-storey height, with a pitched metal roof in two portions. The building is built reasonably close to Mill Lane though is separated by landscaping containing 10 trees, which are semi-mature the majority being in a reasonable condition. Combined they help to shield the building from views from the IDR. The site includes a customer collection parking area nearest Letcombe Street, and a service vehicle area at the end of Crossland Road. The building is not of any particular architectural or historic interest. The building sits reasonably well within its site at a low scale and unintrusive form and coverage and is not in a significant state of disrepair, despite having been vacant since 2023.



Figure 2 - A view of the application site from rooftop of the Oracle car park

- 2.7. The buildings along London Street and Church Street are of high quality. They are constructed predominantly of brick and brick details, with occasional stone or stucco, with most buildings in the immediate vicinity being Listed, or noted as Buildings of Townscape Merit (BoTM). The area has been subject of organic development over some time. The front of the buildings generally present the grandeur and aesthetics of the listed buildings, whereas the rears have been extended in a variety of ways. There has been a loss of gardens through the conversion to parking accompanied by extensive hardstanding. The

rears of the buildings retain high levels of detailing, and the views thereof are part of the experience of the conservation area.

- 2.8. The application site is surrounded on all sides by adopted Public Highway. Mill Lane to the north is a 7m wide 2-lane road in a one-way arrangement. Crossland Road provides limited access and is mostly for properties to the rear of London Street, as well as Saxon Court/Townsend House. Letcombe Street provides access to and From Church Street and St Giles Court.
- 2.9. The Quakers' Meeting House Garden, and St Giles' Church grounds, are noted as 'significant open space' within the Conservation Area, both contributing positively to the character of the area and the area. There is a significant slope to the land falling by around 1.6m at the highest to lowest point south-north. It also falls from west to east.

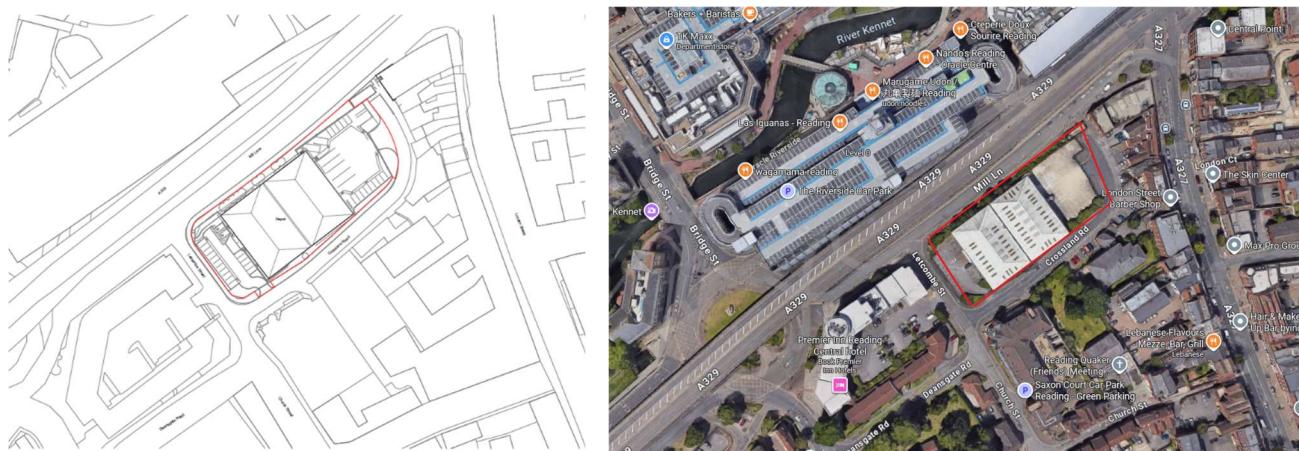


Figure 3 - Site Location Plan and approximate site outline on an aerial view

3. The proposal

- 3.1. All of the plans and information submitted and considered is provided within Appendix 1, it is noted that significant amendments have been negotiated since initial lodgement.
- 3.2. The application proposes the comprehensive redevelopment of the former John Lewis Customer Collection Centre. The existing warehouse building, dating from the 1980s is to be demolished. In its place the Applicant seeks to construct a new five to eight-storey building comprising 170 build-to-rent residential units (Use Class C3), including a flexible community use space at ground floor level (Use Class F1/F2). The site lies within the Reading Central Area, adjacent to the Market Place/London Street Conservation Area, and is surrounded by a mix of uses.
- 3.3. The proposed residential accommodation includes a mix of 1, 2, and 3-bedroom units (quantum shown below), with a total of 27 affordable private rent units. These are split between Local Housing Allowance (LHA) (10%) and Discounted Market Rent (DMR) (6%) tenures. The affordable units are 'tenure-blind' pepper-potted (spread) throughout the development and would all be supplied pre-furnished, to the same standard as the remainder BTR units) and as shown in Table 1 below

Table 1 - Floor by floor and tenure breakdown of the proposed mix of residential units

Floor	Market Build to Rent units				Local Housing Affordable units/Discount Market Rent				Total
	1-bed	2-bed (3P)	2-bed (4P)	3-bed	1-bed	2-bed (3P)	2-bed (4P)	3-bed	
G			1	1		2(1 1)			4
1 st	8	4	8	1	4(3 1)	1		1	27

2 nd	10	3	8	1	2(1 1)	2(1 1)		1	27
3 rd	10	4	8	1	2(1 1)	1		1	27
4 th	10	3	8	1	2(1 1)	2(1 1)		1	27
5 th	13	3	7		2(1 1)	2(1 1)		1	28
6 th	10	4	3						17
7 th	6	4	3						13
Total number	67	23	46	5	12(7,5)	10(6,4)		5(4,1)	170
% within tenure	39.4	14.71	27.06	2.94	7.06	5.88		2.94	
Totals per tenure	143 units – 84.12%				27 units – 10% LHA; 5.88% DMR				

3.4. The scheme incorporates ancillary residents' facilities typical of build-to-rent developments, including a gym and 'wellness area', co-working space, and shared lounge/bookable dining areas. In addition, a flexible community use unit is proposed, which will be managed by the operator and restricted to appropriate Use Class F1 (a-b,d-e) F2 (a-b). The development also includes cycle parking provision, and a car club bay on Crossland Road, though the development itself would be car-free. Landscaping would include two communal courtyards, tree planting, and a 'brown roof'.

3.5. The primary materials are textured red brick (in three shades), with lighter grey and white brick to contrast in select locations. The two distinct blocks can be seen as separate buildings though are linked by matching detailing in quoins, corbelling to parapets and proportion. A portion of the proposal includes a metal clad top, setback from the main frontage. The ground floor, set behind the colonnade includes large expanses of glazing for active frontages, and the cycle store. This glazing would be set in matching metal framed windows that are consistent with the upper floor windows. There is no decrease in design quality in the rear facing east and west elevations.

3.6. The footprint of the proposed building takes up the majority of the application site. A servicing area is proposed to the eastern end of the site. The ground floor contains approximately 50% of its area for servicing facilities.

3.7. In terms of the Reading Community Infrastructure Levy (CIL), the proposals are a CIL Liable development. The Applicant has submitted the relevant CIL liability form. These will be subject to separate consideration by the Council's Infrastructure Monitoring Officer once a formal decision has been issued. It may be the case that the existing floorspace at the site is able to be deducted from the liability subject to demonstrating active use within the relevant timeframes. In addition, it may also be the case that the proposed on-site affordable housing qualifies for mandatory Social Housing Relief. As an example though, in the scenario of there being no deduction for the existing floorspace, the applicant's stated floorspace figure of providing 15,119sqm of market housing would, on a standalone basis, generate a liability of **£2,781,291.24**, based on the 2025 residential CIL rate, though this will be updated to reflect the s106 and Monitoring Officer's calculations and any existing floor space relief once a decision is made.

4. Planning history

Application Site

24/0040 – Request for Screening Opinion

23/1092 – (Pre-application Advice) Demolition of the existing warehouse building and development of approximately 200 residential units (Build to Rent), including affordable housing, together with flexible commercial and/or community uses as required, landscaping, amenity space and parking.

22/0967 – Pre-application advice for proposed residential development

22/0004 – Pre-application advice for proposed redevelopment of site – observations sent.

20/1748 - Pre-Application advice for proposed residential development

01/0386 – Replacement business name signs

96/0750 – Erection of warehouse with customer collection facilities, ancillary car park and servicing area.

95/0852 – Use of yard for temporary car parking (Two years maximum)

93/0937 – Proposed use for B1 – Certificate of Lawfulness

93/0662 – Use of existing building for B8 storage and distribution

4.1. It is noted that the Applicant has engaged with Council through various pre-application discussions. The scheme has been presented on various occasions with a number of different schemes. Broadly, the schemes presented at pre-application stage were larger than the presented scheme and did not elicit support from Officers.



Figure 4 - Pre-application scheme timeline (extract from Design and Access Statement)

4.2. There are currently two large applications under consideration at the Oracle which are considered to be relevant to members.

The Oracle

PL/22/1916 - Mixed use development comprising part demolition of former department store and erection of new buildings comprising up to 218 build to rent residential dwellings (Class C3) & 1,209sqm commercial uses within Uses Class E and/or bar (Sui Generis Use). Reconfiguration and change of use of up to 5,866sqm remaining department store floorspace (Class E) to uses within Use Class E and/or bar (Sui Generis Use) and/or experiential leisure use (Sui Generis Use). Associated public realm, infrastructure works & external alterations to shopping centre, including creation of new shopping centre entrance(amended description)(accompanied by an Environmental Statement) - UNDER CONSIDERATION

PL/22/1917 - Mixed use development comprising demolition of existing buildings and erection of new building comprising up to 218no. build-to-rent residential dwellings (Class C3) & up to 3,046 sqm commercial floorspace comprising cinema (Sui Generis) and ground floor commercial uses within Use Class E and/or Bar (Sui Generis Use). Associated public realm and infrastructure works (amended description) (accompanied by an Environmental Statement) - UNDER CONSIDERATION

5. Consultations (Summaries)

Statutory:

Health and Safety Executive

- 5.1. The Health and Safety Executive (HSE) has reviewed the proposal and has raised no objections from a fire safety planning perspective.

Historic England

- 5.2. Do not wish to offer any comments in relation to the application.

Environment Agency

- 5.3. No response received. EA standard response states they would not like to be consulted on this type of application.

Highways Authority (RBC Transport Strategy)

- 5.4. At the time of writing, RBC Transport raised objection to the proposal. Though, additional details have been sought, and it is considered that these objections would be capable of being overcome, an update report will clarify that these objections are resolved.

Lead Local Flood Authority (LLFA)

- 5.5. The LLFA has provided two formal responses relating to SuDS for the proposal. At the time of writing, the LLFA objects to the proposal. The following matters are yet to be resolved. They are not content that SuDS could be controlled by condition. An update report will be provided to clarify that these matters have been sufficiently resolved.

Active Travel England (ATE)

- 5.6. It is noted that ATE were missed as a consultation on the original planning application. A consultation request was sent on 25 September 2025 to capture any comments. ATE's standing advice has been considered and the proposal would appear to be adequately serviced by walking and cycling routes to encourage walking and cycle in line with this standing advice. An update report will be provided with any response from ATE.

Non-Statutory

Thames Valley Police Designing out Crime Officer (DOCO)

- 5.7. The DOCO provided an initial response with various concerns with the proposal. This has been considered within the Applicant's amendments, the DOCO has responded with no overall objection subject to a suitable condition relating to site security (which would be discharged in conjunction with DOCO).

Thames Water

- 5.8. Thames Water provided an initial response highlighting the need for a build over agreement. Subsequent responses, supported by information by the Applicant elicited a final response that a build over agreement was not required due to the distance to the infrastructure. Thames Water also provided advice regarding driven piles near sewers, which will be included as an informative. No objection was raised.

Royal Berkshire Fire and Rescue Service (RBFRS)

5.9. Comments were received, noting no statutory duty to do so. RBFRS has provided advice to the Applicant for design consideration for fire services, this will be included as an informative.

Design South-East

5.10. During pre-application discussions, a design was considered by Design South East's Design Review Panel (DRP) in January 2024. It is noted that the proposal presented to this DRP was seven-storeys to eleven-storeys in height in a 'U' shaped arrangement). The DRP concluded that the presented scheme neither created a satisfactory place to live, nor makes a positive contribution to Reading's townscape.

Reading Design Review Panel (DRP)

5.11. The application was presented to the Reading Design Review Panel on two occasions due to officers concerns with the submission, prior to formal resubmission and following formal revisions to the application.

5.12. On 28 May 2025 the Panel raised significant concerns about the scale, massing, and transitional quality of the proposed development. Key issues included:

- The building's height and bulk were considered excessive, especially in relation to the surrounding Conservation Area and Oracle buildings.
- The Mill Lane elevation was criticised for being overly planar and lacking articulation; the panel recommended redesigning the building form to break up the flatness.
- The two-storey metal roof on the mansion block was seen as too heavy and dominant; suggestions included reducing its height or setting it back.
- The relationship between the two blocks (mansion and conservation-facing) lacked clarity, with the panel unsure whether they were intended to contrast or complement each other.
- Brick detailing was welcomed but considered too subtle for the building's scale; bolder articulation was recommended.
- The Panel encouraged exploring roof-level amenity spaces and improving the integration of the smaller four-storey "addition" to the building.

5.13. A follow up review following amendments to the scheme took place on 12 August 2025. The Panel acknowledged several positive revisions made since the previous review, but some concerns remained:

- Height concerns persisted; the building remains taller than its surroundings, and the panel reiterated the need to reduce the roof height or remove the upper storey.
- The metal roof setback was deemed insufficient (only 50mm); a deeper setback (300–500mm) or a mansard-style roof was suggested to reduce perceived massing.
- Improvements to the Mill Lane elevation were noted, with increased articulation and detailing.
- The smaller four-storey block was reduced in size and balconies added, which were welcomed.
- The detailing was considered more characterful and helped distinguish the two blocks more clearly.
- Suggestions included enhancing quoin detailing, seeking confirmation on the use of handmade bricks, and exploring additional roof-level amenity spaces.
- The panel revisited ideas around the curve of Crossland Street, colonnade depth, and fenestration patterns on the conservation-facing block.

5.14. It is noted that following the latest DRP, a minor amendment to the scheme was submitted to remove a metal clad portion from the top of part of the building and continuation of brick detailing.

Scottish and Southern Electricity Networks

5.15. No response received at the time of writing.

National Planning Casework Unit (NPCU)

5.16. Consulted in error.

NHS Berkshire Oxfordshire Buckinghamshire Integrated Care Board (NHS BOB ICB)

5.17. The NHS BOB ICB objected to the proposal noting a shortfall in GP services within the area. The response provided a contribution figure toward local health services to be secured by s106 to offset the direct impacts of the development.

RBC Housing Development

5.18. RBC's Housing Officers are generally accepting of the terms associated with the affordable housing provision with specific wording to be agreed within the s106.

RBC Environmental Protection Officer

5.19. RBC's Environmental Protection Officer reviewed the application raised no objections subject to conditions.

RBC Ecologist

5.20. RBC's ecologist noted no objections to the proposed development subject to conditions, including mandatory compliance with the biodiversity net gain (BNG) condition.

RBC CCTV Officer

5.21. No response received at the time of writing.

RBC Access Officer

5.22. RBC's Access Officer provided a response with a long list of concerns for the original proposal. These have been considered by the Applicant in a revised submission, and it is noted that no objection is specifically raised.

RBC Building Control

5.23. No response at the time of writing.

RBC Planning Natural Environment (Tree) Officer

5.24. RBC's Natural Environment Officer notes that the existing trees, though of reasonable quality and appearance may be replaced within a comprehensive landscaping scheme for the proposal. At the time of writing, the Natural Environment Officer retained concerns around consistency of the plans, relationship between trees and the development (particularly balconies), and the integration of SuDS and landscaping. The NE Officer raised concerns about reality of implementing the landscaping proposed, however offered conditions that could be applied to a permission, and therefore is not considered an objection.

RBC Waste Services

5.25. The RBC Waste Officer raised concern with the reliance on waste management by the Applicant. However, subject to implementing the waste management strategy, there is no objection.

RBC Conservation Officer

5.26. RBC's Conservation Officer provided an initial response with an objection on heritage grounds. The revised response noted no objection to the proposal.

Berkshire Archaeology

5.27. Berkshire Archaeology's response noted no objection to the proposal subject to conditions.

Conservation Area Advisory Committee (CAAC)

5.28. An initial response from CAAC raised objection to the proposed development. A second response acknowledged the applicant's engagement with the community and welcomed the revisions made to the scheme. Though it appears the representation is made as 'no objection' the response concludes that the "site deserves better".

Architecture Aero – Wind and Microclimate Consultant

5.29. Architectural Aerodynamics Ltd. (ArcAero) conducted an independent peer review on behalf of Council, of the Applicant's wind microclimate assessment. The review confirmed that the methodology used is appropriate and industry standard, with a suitable number of wind directions assessed. However, ArcAero requested clarification and additional data. Following the initial response, the Applicant provided the additional details required. ArcAero confirmed that the additional details were suitable to conclude the findings remainders acceptable.

BRE – Daylight and Sunlight Consultant

5.30. BRE was instructed by the Local Planning Authority for third-party review of the submitted daylight and sunlight assessments submitted by the applicant. The response concluded that the methodologies used are consistent with BRE guidance and BS EN17037 standards. The scope of the assessment is broadly appropriate, covering the nearest residential properties.

5.31. In terms of impact on surrounding properties, BRE identifies minor adverse daylight impacts to Caxton House (1–16 Deansgate Road), Townsend House, the consented scheme at Central Club, and 46 London Street. The proposal would result in moderate adverse impacts to Saxon Court. At Saxon Court, 38 of 51 windows fall below BRE daylight guidelines, with some experiencing losses greater than 40%.

5.32. Within the proposed development itself, 95% of bedrooms (258 out of 271) meet the daylight target. However, only 54% of living/kitchen/dining areas meet the living room daylight recommendation, and just 47% meet the higher kitchen target. Lower floors (levels 1–4) perform particularly poorly, with many rooms affected by internal design constraints such as deep single-aspect layouts, access walkways, and balconies. BRE concludes that these limitations are due to the proposal's own design rather than obstruction from surrounding buildings.

5.33. Sunlight provision is more positive, with 74% of living areas meeting the minimum recommended exposure. BRE considers this a reasonable outcome for a large development, acknowledging that north-facing rooms will naturally receive less sunlight. Sunlight provision to proposed ground-level open spaces also meets BRE guidelines comfortably.

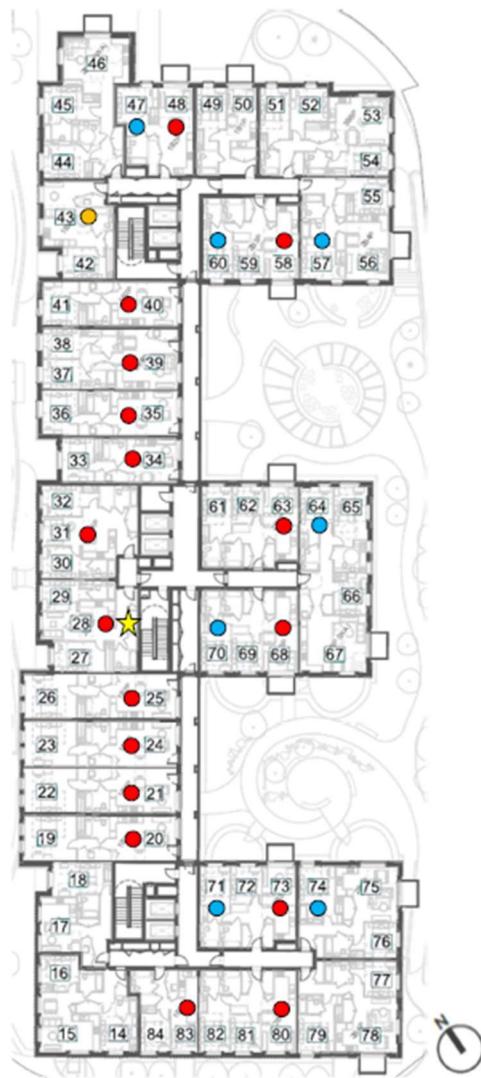


Figure 5 - Extract from BRE review of the proposed 2nd floor, orange dots meet the living room recommendation, but are below the kitchen target; red dots are below the living room daylight recommendation, blue dots are rooms below the bedroom recommendation, the star highlights the worst case example room.

5.34. In summary, while the assessments are methodologically sound, BRE highlights areas of concern regarding daylight provision within and around the scheme.

RBC's Neighbourhood Services Project Officer

5.35. A response was received detailing a scope of works capable of being achieved by Council within the identified parameters and proposed contribution.

Reading Civic Society (RCS)

5.36. No response received at the time of writing, though it is noted that CAAC works closely with RCS.

Reading Sustainability Manager

5.37. Discussions occurred with the Applicant, the Applicant confirmed no interest in connecting to the planned district heat network.

Focus – Energy and Sustainability Consultant

5.38. Focus were instructed by Council to conduct a third party review of the Applicant's energy proposals for the development. The design specification strategy demonstrates a favourable performance against the Building Regulations' targets, especially due to the dwelling's 'fabric first' approach, incorporation of exhaust ASHP design for heating purposes, and further inclusion of Solar PV. The build specification is also favourable

when comparing to the minimum requirements of Part L 2021, which is reflective of a quoted total 71.8% reduction in carbon emissions is forecasted on site for the scheme, with the remainder to be offset via financial contribution.

Katesgrove Community Association

5.39. An initial response was received from Katesgrove Community Association, noting objection to the proposal. The KCA worked in collaboration with the Civic Society and CAAC, and welcomed the revised design for the site, particularly the reduction in height and bulk from 215 to 170 units. While the development remains substantial, improvements in articulation and visual impact along Mill Lane are acknowledged. The inclusion of decorative terracotta elements is praised for referencing Reading's brick heritage, though some features like Juliet balconies and window proportions are seen as less distinctive. KCA supports the idea of incorporating the building name vertically to enhance identity and reflect local history. Overall, the revised design is considered an improvement, and KCA supports residential redevelopment of the currently unused site, though it regrets the absence of disabled parking provision.

Public Comments

5.40. Letters were sent to a large number of properties within the area upon initial lodgement. Following resubmission, 4 site notices were erected around the site. All original submitters were also notified of the changes to the scheme via e-mail.

5.41. The application received 102 comments from members of the public. 101 letters of support were received, and one objection was received relating to impacts upon Saxon Court (which is discussed below).

5.42. The Applicant also undertook significant community engagement prior to submission of the application in line with Council's Statement of Community Involvement (2014). This included significant leaflet drops, a consultation website, newspaper advertising, local media engagement, public webinar, and public exhibitions. This appears to be an exceptional level of public engagement by the Applicant.

6. Legal context

6.1. Section 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving a listed building or its setting or any features of special interest which it possesses.

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

6.3. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'. However, the NPPF does not change the statutory status of the development plan as the starting point for decision making (NPPF paragraph 12).

6.4. In this regard, the NPPF states that due weight should be given to the adopted policies of the Local Plan 2019 according to their degree of consistency with the NPPF (the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given).

6.5. Accordingly, the latest NPPF and the following development plan policies and supplementary planning guidance are relevant:

NPPF December 2024

2. Achieving sustainable development

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

National Planning Practice Guidance (2014 onwards)

6.6. Reading Borough Local Plan 2019

- CC1: Presumption in Favour of Sustainable Development
- CC2: Sustainable Design and Construction
- CC3: Adaptation to Climate Change
- CC4: Decentralised Energy
- CC5: Waste Minimisation and Storage
- CC6: Accessibility and the Intensity of Development
- CC7: Design and the Public Realm
- CC8: Safeguarding Amenity
- CC9: Securing Infrastructure
- EN1: Protection and Enhancement of the Historic Environment
- EN2: Areas of Archaeological Significance
- EN3: Enhancement of Conservation Areas
- EN6: New Development in a Historic Context
- EN9: Provision of Open Space
- EN10: Access to Open Space
- EN12: Biodiversity and the Green Network
- EN14: Trees, Hedges and Woodland
- EN15: Air Quality
- EN16: Pollution and Water Resources
- EN17: Noise Generating Equipment
- EN18: Flooding and Sustainable Drainage Systems
- EM3: Loss of Employment Land
- H1: Provision of Housing
- H2: Density and Mix
- H3: Affordable Housing
- H4: Build to Rent Schemes
- H5: Standards for New Housing
- H10: Private and Communal Outdoor Space
- TR1: Achieving the Transport Strategy
- TR3: Access, Traffic and Highway-Related Matters
- TR4: Cycle Routes and Facilities
- TR5: Car and Cycle Parking and Electric Vehicle Charging
- OU1: New and Existing Community Facilities
- CR1: Definition of Central Reading
- CR2: Design in Central Reading
- CR3: Public Realm in Central Reading
- CR6: Living in Central Reading
- CR14: Other Sites for Development in Central Reading

6.7. Supplementary Planning Documents (SPD)

- Affordable Housing (2021)
- Employment, Skills and Training (2013)
- Revised Parking Standards and Design (2011)
- Planning Obligations under Section 106 (2015)

6.8. Other relevant documentation

Reading Borough Council Tree Strategy (March 2021)

Reading Biodiversity Action Plan (March 2021)

BRE Site Layout Planning for Daylight and Sunlight – A guide to good practice, (BR 209 2011 edition)

Local Plan Partial Update Submission Draft– May 2025

The National Design Guide (2021)

The National Model Design Code (July 2021)

Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking (Historic England, 2015)

Historic Environment Good Practice Advice in Planning: 3 (2nd Edition) The Setting of Heritage Assets (Historic England, 2017)

Reading Historic area assessment February 2023

Market Place/London Street Conservation Area Appraisal 2007

Reading Borough Council Statement of Community Involvement DRAFT (2025)

Active Travel England Standing Advice Note: Active travel and sustainable development

Local Plan Partial Update

6.9. The current version of the Local Plan (adopted in November 2019) turned five years old on Tuesday 5th November 2024. The Local Plan was reviewed in March 2023 and around half of the policies in the plan are considered still up to date. However, the rest need to be considered for updating to reflect changing circumstances and national policy. A consultation version of the draft update of the Local Plan was published on 6th November 2024.

6.10. Although there is a five-year period for carrying out a review of a plan after it is adopted, nothing in the NPPF or elsewhere says that policies automatically become “out of date” when they are five years old. It is a matter of planning judgement rather than legal fact whether a plan or policies within it are out-of-date. This will depend on whether they have been overtaken by things that have happened since the plan was adopted, either on the ground or through changes in national policy, for example. Officer advice in respect of the Local Plan policies pertinent to these applications listed above is that they remain in accordance with national policy and that the objectives of those policies remains very similar in the draft updated Local Plan. Therefore, they can continue to be afforded weight in the determination of this planning application and are not considered to be ‘out of date’.

6.11. The Local Plan Partial Update was submitted to the Secretary of State on 9th May 2025. Submission marks the beginning of a process of public examination led by an independent Inspector. Due to the stage of examination, the draft Local Plan can be afforded limited weight.

7. Appraisal

7.1. The main considerations are:

- i. Land use principles
- ii. Design and character and appearance of the area; including listed buildings and conservation area impacts
- iii. Quality of accommodation for future occupiers
- iv. Amenity for nearby occupiers
- v. Affordable Housing
- vi. Infrastructure Requirements
- vii. Sustainability and Energy

viii. Transport and Highways

ix. Other matters – ecology, SuDS, archaeology, crime and safety, wind and microclimate

i) Land Use Principles

7.2. From the outset, it is considered pertinent to first reference that the site, despite not being specifically allocated as a residential site in the local plan, is currently allocated within the Local Plan as part of the Oracle extension for 1,600-2,000m² of retail or town centre uses, with the site identified for car parking (Policy CR14g).

7.3. The National Planning Policy Framework (NPPF) (2024) sets out a presumption in favour of sustainable development (Para. 11) with three overarching objectives, economic, social and environmental. Sustainable development should therefore be approved where it accords with the development plan unless the adverse impacts of doing so would significantly outweigh the benefits of development. The NPPF also encourages the effective use of land by reusing land that has been previously developed; (Para. 124), especially where that land is under-utilised, and within a settlement.

7.4. The NPPF has identified an increased need for housing across the country, including Reading. The Emerging Local Plan includes provisions for an increased housing target in Reading. Combined, this points to an increased demand for housing in this location.

7.5. Paragraph 5.4.36 associated with Policy CR14 outlines that there is some potential for community uses not anticipated by the Local Plan. However, it is also noted that no assessment by Council has identified any need for a community use on this site.



Figure 6 - Reading Borough Local Plan 2019 'Proposals Map' Extract showing existing allocated site

Loss of existing use

7.6. The building was last in use as a customer collection centre. This is within lawful Class B8 use. Policy EM3 concerns loss of employment land within core employment areas and outlines matters to be considered when assessing proposals that result in the loss of employment land. The site is not located within a core employment area.

7.7. In addition to policy EM3, the site is allocated for development as part of 'the Oracle' extension and includes a public car park over the existing site. There is therefore a degree of acceptance within the local plan that the site could be lost as employment land. The site appears to have been vacant for some time with attempts to let the property anecdotally apparent from 2023, though this has not been detailed by the applicant. The site is located within a mixed use area (i.e. not a purely 'residential area') and given the

low impact use of a B8 use, it is not considered that continued use as such would have impacts upon the amenity of residents.

- 7.8. The non-residential planning commitments at 31 March 2025 (published June 2025) outlines that there has been a net loss of 616m² of B8, and a gain of 229m² of B2 floorspace Reading borough from 1 April 2024-31 March 2025. Both B2 and B8 are highlighted above as change of use from B2 to B8 is permitted development pursuant to The Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO) (as Amended).
- 7.9. It is considered that the need for housing within close proximity of the town centre, and within the Reading Central Area in seeking to meeting Policy H1, is a stronger need than employment uses within this location. It is considered that the loss of employment use at the site would be acceptable having regard to Policy EM3.
- 7.10. It is noted that the site is designated as public carparking under the Local Plan. There is no Council Policy that stipulates that a minimum amount of public car parking in the town centre only a maximum and therefore the departure in this regard is acceptable.

Principle of Build to Rent residential accommodation

- 7.11. The proposal will provide 170 residential units, which is a significant contribution to the Borough's need for an average of 689 dwellings per annum across the plan period in accordance with Policy H1 (Provision of Housing). In this instance the proposal is for Build to Rent residential accommodation, which is an established and accepted form of housing provision at the national and local level. Policy H4 (Build to Rent Schemes) clearly sets out the circumstances in which such developments will be supported. The applicant has confirmed agreement to all of the required commitments in terms of operation of the Build to Rent units. This includes, but is not limited to, single ownership for a minimum 20 year term from occupation, there being minimum three year tenancies for private renters, a high standard professional on-site managements and meeting RBC's voluntary Rent with Confidence Standards. All the requirements will be secured within the proposed s106 legal agreement, thereby demonstrating the full commitment of the applicant to these Borough requirements.

Departure from Local Plan and Local Plan Partial Update

- 7.12. The proposal is located within a wider parcel of land which includes the Oracle shopping centre opposite the IDR on the south side of the Kennet and that is allocated for development under Policy CR14g. This Policy seeks:

CR14g THE ORACLE EXTENSION, BRIDGE STREET AND LETCOMBE STREET

Development of the area between the River Kennet and Mill Lane for retail, with use of site at Letcombe Street for public car park

Development should:

- *Address flood risk issues;*
- *Enhance the setting of the Conservation Area;*
- *Take account of potential archaeological significance; and*
- *Address any contamination on site.*

Site size: 1.67 ha 1,600-2,000 sq m of retail or town centre uses

- 7.9. The proposal does not align with the type of development allocated for the wider site under Policy CR14g, which is for retail development, and in this respect are considered to be departure from the Local Plan. As such, and as, required by Paragraph 15 of the Development Management Procedure Order (2012) (as amended) the proposals were advertised as being not in accordance with the Development Plan. It is pertinent to note that within the ongoing Local Plan Partial Update Submission Draft (May 2025) significant changes are proposed to the allocation as outlined in the excerpt of draft policy CR14(r):

CR14r JOHN LEWIS DEPOT, MILL LANE

Development for residential

Development should:

- ***Avoid detrimental effects on the setting of listed buildings and the Conservation Area;***
- ***Take account of potential archaeological significance;***
- ***Address noise impacts on residential use;***
- ***Address air quality impacts on residential use; and***
- ***Address any contamination on site.***

Site size: 0.37 ha

76-110 dwellings

Figure 7 - Extract from Local Plan Partial Update Submission Draft (May 2025)

7.10 Notably the draft allocation also splits the site from the existing allocation, with the site to the north of the IDR allocated for separate development. The proposal would align with the draft allocation for the site, though is in excess of the envisaged site capacity.

7.11 However, as discussed earlier in this report, given the Local Plan update is ongoing at such an early stage, it is advised that limited weight can be attributed to the emerging policy, albeit it indicates an anticipated direction of travel for the policy in the future. As such the proposal must be assessed as a departure from the current 2019 adopted version of the Local Plan in respect of Policy CR14g and it needs to be considered whether there are material considerations that would justify this departure from the Development Plan, and this will be considered later in this report.

7.13. There may be concern that the scheme is premature in the context of Local Plan review. Paragraph 50 of the NPPF (2024) discussed prematurity in decision making. This includes discussion that prematurity would only in limited circumstances justify refusal of planning permission where: the development is so substantial, or its cumulative effects would be so significant, that a grant of permission would undermine the plan-making process, and the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.

7.14. The Local Plan Partial Update Submission Draft (May 2025) is at an advanced stage, however the provision 170 dwellings on site would not be so significant as to undermine the plan-making process. As such, prematurity is not considered a barrier to considering the scheme for approval, subject to all other matters outlined within this report.

7.15. The NPPF (2024), among other things, informs the standard assessment of housing need within local areas. This has resulted in an increased need for housing need may be forthcoming (as outlined within the Local Plan Partial Update Submission Draft (May 2025)) The increase of 136 dwellings per annum appears to have been considered within the drafting process, and the housing need has been met through identified sites in the plan drafting process.

Ancillary facilities at ground floor and Class F1/F2 Community Use

7.16. The proposal also includes 650m² space at ground floor level which will comprise ancillary residential facilities for residential occupiers, including a gym and wellness area, home working area, and dining/lounge area. Such spaces are commonplace in Build to Rent schemes, providing additional on-site facilities for future occupiers.

7.17. At the outset of the application the applicant included a flexible Class E/F1/F2 use. However, this was adjusted during the application, and it has instead been shown as flexible F1/F2 use with an area of 65m². This space is at ground floor beyond the lobby,

and has direct access to the courtyard. The applicant has attempted to detail this within the submitted statements. It is indicated that the space would be available for local organisations and members of the community. Stating that its need has been assessed by an audit and community engagement. It is stated that it would be independently run, and leased at a peppercorn rent. Though, there is a lack of certainty over its future operation and detail. The information submitted seeks to engage Reading International Solidarity Centre (RISC); Reading Green Wellbeing Network; Katesgrove Community Association, and Berkshire Youth.

7.18. Following discussions with the Applicant further on the proposed use of this space, the Applicant has sought to further detail the set of uses envisaged. They have sought the following to be included within the proposal. It is noted that these uses are broad and could fulfil a number of private and public operations. The lack of clarity does not enable Officer's to consider this to be a truly open and accessible community space, albeit that it could evolve to be so at the discretion of the Applicant/operator. It is equally possible that it could evolve to not be a public benefit. Given this uncertainty, it is not considered that the use of this portion of the building can be considered a true public benefit, and is neutral in the overall balance as will be discussed further below.

Class F1	<ul style="list-style-type: none"> a) Provision of education b) Display of work of art (otherwise than for sale or hire) ... d) Public libraries or public reading rooms e) Public halls or exhibition halls
Class F2	<ul style="list-style-type: none"> a) Shops (mostly) selling essential goods, including food, where the shop's premises do not exceed 280 square metres and there is no other such facility within 1000 metres b) Halls or meeting places for the principal use of the local community

Conclusion

7.19. The provision of 170 build to rent dwellings to assist in meeting the identified Local Need is an important contribution, though this is also set against a backdrop of high housing delivery which is expected to continue. The site is a brownfield site (as defined by the NPPF (2024)), and officers are mindful of the advice contained within Paragraph 125 (c), "... planning decisions should: give substantial weight to the value of using suitable brownfield land within settlements for homes ... proposal for which should be approved unless substantial harm would be caused...". The allocation of the site within the Local Plan Partial Update Submission Draft (May 2025) does provide an indication that residential development could be appropriate, and does not include any community use/space, however it is afforded limited weight in considering the proposal. Notwithstanding, given Reading's high connectivity both to and around the centre, and significant local amenities and activities the provision of residential on a highly accessible site would be acceptable in principle subject to all other matters discussed below, including harm arising from the proposal. The Local Planning Authority may also take the decision to depart from the Development Plan, only if material considerations in the particular case indicate that the plan should not be followed (NPPF paragraph 12), this will be discussed in the overall planning balance below.

7.20. It should be noted that the supporting text of policy (5.4.36) notes that there may be the potential for community uses within allocated residential developments. These such uses can have a benefit in terms of provision additional activation at ground floor levels. The Applicant has indicated that the use of the garden outside of the non-residential unit would included and that access would be via the communal gardens. There is concern that this arrangement would lead to security issues and potentially reduce the usable space for residents.

7.21. The provision of a 65m² flexible Class F1/F2 space (Local Community and Learning) to be leased to local community groups and run is commendable. However, the community space is not considered to be a material planning benefit, as it appears to be ancillary to the private residential scheme, and lacks direct public access suggesting that the

space/use would only be available on a controlled basis by the site owner/operator. Earlier iterations of the scheme located the flexible use at the Mill Lane frontage with independent access which may have assisted in the justification put forward.

7.22. The Applicant has detailed a draft Memorandum of Understanding (MoU) with local community groups for the use, and community use of the space. Whilst this is appreciated, it should be noted that a MoU has no legal force and would not be controllable by the s106 agreement. Furthermore, the need is not demonstrated for this use and therefore is not considered necessary to make the development acceptable in planning terms. Securing via s106 would not be possible. Securing the above set of proposed uses, to restrict the change to a use that could have impacts on residential amenity is considered necessary.

ii) Design and character and appearance of the area; including listed buildings and conservation area impacts

Demolition

7.23. The existing building on site is proposed to be demolished under this application. As described in the introduction section of this report above, the existing building is not considered to be of any special architectural or historic merit that its demolition would be an inhibitor to development. The demolition could therefore be supported, subject to the proposed replacement building being considered appropriate as discussed below.

Relevant Local and National Policies and Guidance

7.24. The NPPF (2024) states that good design is a key aspect of sustainable development and is inextricably linked to good planning. In determining planning applications, local authorities should ensure developments are sympathetic to local character, including the surrounding built environment and landscape, whilst not preventing or discouraging appropriate change.

7.25. Local Plan Policy CC7 states that, *“all development must be of high design quality that maintains and enhances the character and appearance of the area”*. Policy CR2's purpose is to secure appropriate relationships between buildings, spaces and frontages within the centre of Reading. Policy CR2 also seeks high quality design within Central Reading and creating a distinctive and high quality environment. Policy CR3 requires development to make a positive contribute toward the quality of public realm in Central Reading.

7.26. The NPPF (2024) outlines government policy, including its policy in respect of the historic environment. Chapter 16 of the NPPF (2024) 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development. The paragraphs of this section provide a guide to balancing harm to the heritage assets within the area against desirability of development. Notably, paragraph 215 states: *“where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighted against the public benefits of the proposal ...”*.

7.27. Policies EN1, EN3, and EN6 of the Reading Borough Local Plan (2019) collectively emphasise the protection, enhancement, and sensitive integration of new development within the historic environment. EN1 requires proposals to safeguard the significance of heritage assets and their settings, avoiding harm unless justified by clear public benefits. EN3 focuses on enhancing Conservation Areas through measures such as restoring original features, improving landscaping, and reducing visual clutter. EN6 sets expectations for new development to positively contribute to the historic townscape by respecting scale, materials, and local heritage themes, and promoting access to historic significance. Together, these policies guide development to reinforce local distinctiveness and historic character. It is noted that the NPPF states: *“Significance derives not only from a heritage asset's physical presence, but also from its setting.”*

Character of the Area

7.28. The policy emphasis on maintaining and enhancing the character of the local area directly applies to the site's closest environment and neighbouring properties. The site relates predominantly to the lower scale developments on the southern side of the IDR. The regionally-important shopping centre opposite, and the pending planning applications at the eastern end of the Oracle for a major residential-led redevelopment (PL/22/1916 & PL/22/1917) are set within a significantly different context and may be subject to change in the future.

7.29. The immediate surrounds include a high prevalence of listed buildings, and buildings of townscape merit (BoTM) along London Street and Church Street, and within the Conservation Area. Figure 8 shows the concentration of listed, and BoTM as designated within the Market Place/London Street Conservation Area Appraisal (CAA) (2007) (noting the application site is obscured by the legend). The area is the southern quarter of Reading, part of an area where the listed buildings from the 16th, 17th, 18th, and 19th centuries are concentrated. Therefore, the special interest of the Conservation Area surrounding the application site lies in its rich architectural and historic character, including medieval churches with treed churchyards, timber-framed buildings from the 16th and 17th centuries, Georgian townhouses, and distinctive local brickwork. It also features fine 19th-century commercial buildings, tranquil green spaces, and a peaceful atmosphere, particularly along Church Street, all of which contribute to the area's unique identity and heritage value.

7.30. Reference is also given to the Reading Historic Area Assessment (2023) prepared on behalf of Reading Borough Council. This assessment is a rapid Historic Area Assessment (HAA) which identifies Reading's historic environment and signposts issues and opportunities. The appraisal highlights the opportunity for the expansion of the Conservation Area toward Southampton Street to promote regeneration and protect character and appearance of this section which also contains good late 19th century housing.

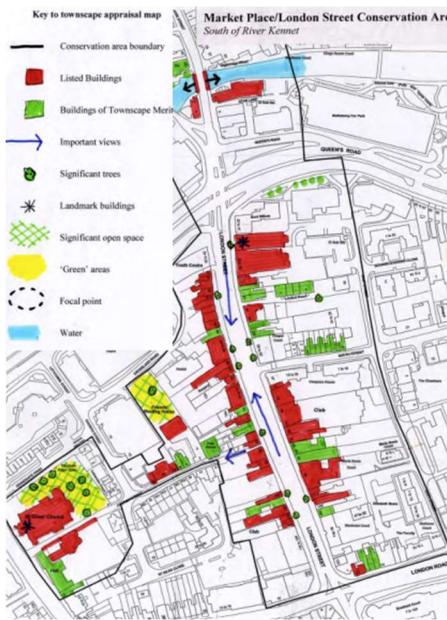


Figure 8 - Market Place/ London Street Conservation Areas Appraisal Extract (2007)

Scale: Height and Massing

7.31. Scale includes the height, width, and length of the proposal. The site's context for an increase in scale is identified through the various supplementary information provided by the Applicant. The appraisal referenced the approved Central Club site at four-storeys, and the Premier Inn at a maximum height of seven-storeys which are important to the sites context. Reference is also given to the Oracle proposals opposite which. The Oracle

proposals are currently presented as six to thirteen-storey buildings facing the IDR (increasing further beyond that) though this is not relevant to the local context.

7.32. The scale of the surrounding buildings is clearly identified in the extract image below (Figure 9), which shows that on this side of the IDR the scale of buildings is significantly lower than the inner Central Reading areas. As outlined in the site description above, the prevailing building heights are predominantly limited to four-storeys. The Applicant has provided information to assess the townscape impacts of the proposed development. Notably, the Applicant has considered the site within an area which they have independently defined by virtue of 'commercial use' which includes modern developments within the vicinity (area 1a as shown on Figure 10). However, the grouping of these uses, across the IDR by virtue of land-use rather than proximity and scale is considered to be flawed. Linking the building to a separate area, that has a different townscape character and heights is not specifically relevant to this site. The townscape transition image shows this most clearly (Figure 11). Attempts have been made by the Applicant to suggest they would 'pair' the buildings with those opposite the IDR, as seen briefly in passing by those driving through Reading across the IDR though this is not relevant. Residents will view the building at the human scale from the road level mostly on the south of the IDR, as there are limited views from the Oracle side (other than the London Street/Duke Street crossroads with the IDR).



Figure 9 - Extract map of building heights within immediate vicinity (left) Figure 10 - Extract map from Applicant's assessment of townscape impacts (right)

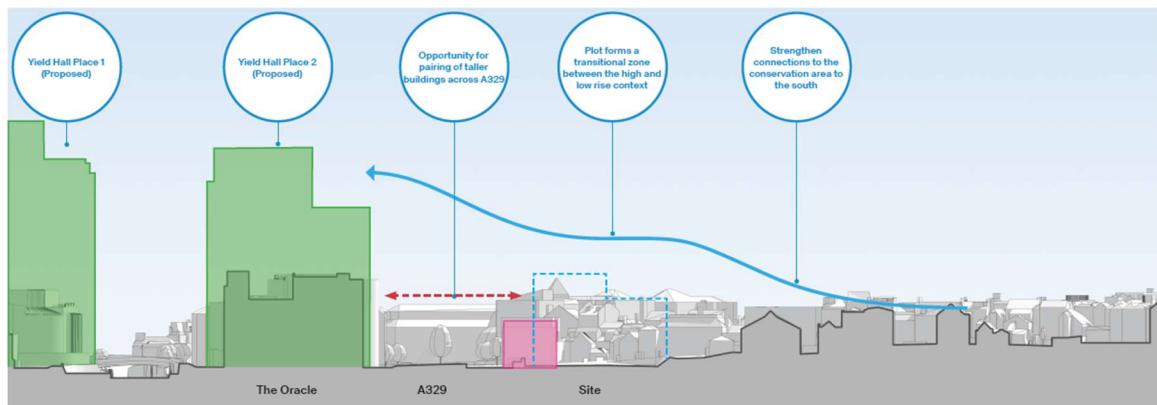


Figure 11 - Townscape transition image from original design and access statement (note: proposal outline reflects original submission scheme)

7.33. Officers consider that the scale of the proposed development in terms of height and massing is therefore abrupt in its transition to the prevailing character and appearance of the area. This is also highlighted as a concern by the Reading Design Review Panel (DRP). Figure 14 shows a series of images with the relationship between the building

heights of the area. It shows that the proposal would be taller than the majority of the Oracle car park (excluding lift overruns/landmark feature). The proposal also demonstrates the abrupt transition between buildings across the site on all sides. The internal site transitions are also sharp with minimal depth or transitional features to soften them. Most notably, around Letcombe Street, the proposal extends from the four-storey end of the Premier Inn to eight-storeys. To the rear (Crossland Road), it is again clear that the height of the building, being taller than adjacent sites (Saxon Court and Townsend House). The advice of the Reading DRP, the scheme would sit more comfortably and achieve more of a transitional quality, and improve the experience at street level, if it were reduced in height. Notwithstanding these attempts, the overall scale and massing, of itself, would result in harm to the character and appearance of the area.

7.34. The Applicant has presented a Heritage, Townscape Visual Impact Assessment (HTVIA) to support both the original and revised proposal. To illustrate the proposals impact (or lack thereof in the opinion of the Applicant) a number of views from within and around the Conservation Area have been prepared with the proposal input through CGI. The below Figure 12 - Figure 13 show the existing and the proposal views.

7.35. It is noted that the key parts of the Conservation Area the site would be visible include: Junction of London Street and the IDR; St Giles' Church, Church Street and Letcombe Street; as well as the rears of all buildings within the CA, including the Quakers' Meeting House Garden. The Applicant's HTVIA assessment concludes that there would not be 'harm' to the significance or setting of nearby listed buildings.



Figure 12 - Existing views of site from surrounding area



Figure 13 - CGI views of proposal from surrounding area

7.36. There are a number of key matters where Officer's disagree with the HTVIA submitted, these include:

- The Applicant's dismissal of the harm on the views of St Giles' spire from within the Conservation Area;
- The Applicant's reliance on the lack of visibility from the front of buildings within Conservation Area to justify the visual dominance of the proposal where viewed from rears or properties within the conservation area, and the impacts on the setting of the conservation area resulting in an improvement from the existing situation
- The degree of responsiveness in building heights and stepping down of the building, as well as how that step would be appropriate
- How the architectural language and form reflects the conservation
- Public benefits associated with the proposal

7.37. With regard to the views of St Giles' Church Spire, the Applicant has focussed upon one specific view where the consented scheme at Central Club would block the Church Spire. However, there are other locations within the Conservation Area where the spire would be visible when the Central Club site is developed. It is also noted that The Oracle proposals include a reduced built form near the IDR that could give increased views toward the St Giles' Church spire. The existing value of the views toward the spire from the Conservation Area would be lost, causing less than substantial harm to the wider settings of the Church of St Giles and the conservation area at a low level.

7.38. The proposal would improve the appearance of Crossland Road, through landscaping and works for the proposal. It is noted that the applicant believes the loss of the warehouse which, by virtue of the form, layout and boundary treatments would be harmful to the setting of the listed buildings and Conservation Area as existing. This is acknowledged, however the limited scale of the building, hardstanding and fencing is not considered to be large enough in scale to be negative in the context of the Conservation Area.. It would present a large building in close proximity to neighbouring sites, the proposal is considered to result in less than substantial harm at a low degree to its setting of the Listed Buildings, and BoTM on London Street.

7.39. For the Quakers' Meeting House and properties along Church Street. The existing views that of an open view above the existing warehouse, with a clear view of the Oracle carpark (some 90m from the rear of the grounds). This would be replaced with the view of the proposal at its closest point 18.5m from the end of the grounds. This six-storey building, would then abruptly extend to the full height another 6.5m from the edge (24m from the rear of the grounds). The Applicant's statement highlights that the massing has been focused on the northern portion whilst is also somewhat inaccurate, as the eight-storey component extends over half the depth of the site. The other LB's and BoTM along Church

Street have less open views toward the site, though would have similar but lessened impact. The proposal is also considered to result in less than substantial harm at a low degree to the setting of LB's and the and BoTM on Church Street.

7.40. Whilst the harm arising would be less than substantial from a heritage perspective. Paragraph 212 of the NPPF (2024) advocates great weight to the asset's conservation. I would give considerable importance and weight to the harm I have identified in my balancing judgment below. In addition, Paragraph 213 of the Framework emphasises that any harm to, or loss of, the significance of a designated heritage asset, should require clear and convincing justification. Paragraph 215 states where a development will lead to less than substantial harm to the significance of an asset, the harm should be weighed against the public benefits.

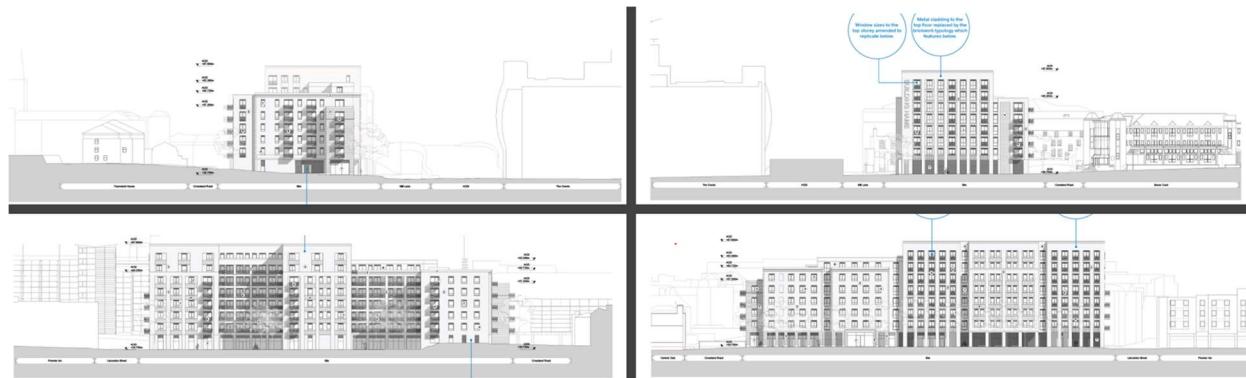


Figure 14 - Streetscene/Section plans showing relationship to surrounding buildings

7.41. As above, scale is also concerned with the width and length of buildings. The proposal is essentially a large, single block covering a large proportion of the application site. The total length along Mill Lane is approximately 96m, and the depth is 33m. For reference to the site, the building is set 5m from the back of the Mill Lane footpath, 2.5m from Letcombe Street, and between 2.75m and 7.5m from Crossland Road. This overall length in isolation would be very concerning. However, with improvements to the design of the scheme, efforts have been made to minimise the overall monolithic nature of the design. This improvement has been informed by the DRP's comments and officer feedback. In 3D view as shown in Figure 15, the building has made attempts to reflect historic and modern designs within the architectural detailing. The width of the building (or depth) also takes up the majority of each road frontage.



Figure 15 - Extract CGI image showing the northern elevation of the proposal

Architectural Details and Materials

7.42. As detailed above, the area is of a varied architectural appearance, which includes differing styles, detailing, and materials, although brick is a common theme. The proposal seeks to take reference from the London Street Conservation Area buildings. The applicant has noted that the Conservation Area contains a 'playful' and varied materiality,

including articulated windows with surrounds, Juliet balconies, and varied roof forms (including mansard roofs).

7.43. The proposal includes two visually-distinct 'blocks' as viewed from Mill Lane. The architectural styling is outlined as a homage to a traditional Mansion block, with a reduced material palate and refined detailing. The portion closest to London Street has a simplified design, with detailing in the form of 'quoins' to mark the corners of the building, brickwork corbelling at the parapet, a lighter contrasting brickwork around the windows to give a sense of difference and window surround, (referred to hereafter as the 'Conservation Block' left side of Figure 16 below). This portion also includes a diamond brickwork pattern to the front. The end of this portion includes a five-storey 'nib' which is proposed as corbelled with balconies toward the Central Club site. The remainder of the side elevation includes balconies and narrow windows with the other detailing from the front continued. The building includes recessed portions which break up the scale of the proposal. These recessed portions include a contrasting material, and this is proposed as aluminium cladding. On the roof of the 'Conservation Block' sits a 'rooftop extension' set back 1.75m from the main elevation. This extra height in this location is softened by this setback.



Figure 16 - Extract image of design elements with example images of inspiration. Including eastern end elevation

7.44. To the other portion of the building (right hand side of above image, hereafter referred to as the 'Mansion Block'). This portion incorporates a more modern design, with larger windows surrounded by diamond pattern brickwork, and a lighter brick course. A mix of windows are proposed, with Juliet balconies and decorative metal railings on either side of the protruding element. Wrapping around Letcombe Street, the proposal follows the predominant design of the Mill Lane frontage, with every third window as a Juliet balcony with railing. Where the building steps down to six-storeys closest to Saxon Court, a band of diamond brickwork detailing separates a similar elevation, which includes full balconies

over the landscaped courtyards (within the site boundary). The rear of the building continues the form of the front. Each rear protrusion matches the detailing of the front portion to which it is attached. Notably, the proposal includes open air access decks to an umber of flats, as well as one set of balconies face the Conservation Area to the rear on each portion. The provision of balconies, and access decks are an uncharacteristic feature of the area should be noted.



Figure 17 - CGI elevation of corner of proposal nearest Letcombe Street, and rear of proposal along Crossland Road

7.45. At ground level, the proposal includes a mix of features, which again aim to enliven the street and break up the appearance of a single block. The main entrance to the building is proposed below the 'Conservation Block' portion of the building. This is significantly glazed with a thick surround of light coloured brick matching the window surrounds above. Along the entire frontage of Mill Lane, the proposal also includes a colonnade. The colonnade is 1.3m in depth from the inside of the pillars to the front facing wall. The function of the colonnade is not immediately clear and is not a feature of the area. It would appear primarily to provide level access from the bin store to Letcombe Street, and for other serviceable areas. It would also function for cyclists existing the building heading towards Letcombe Street, though there are multiple routes including ramps which lead towards Mill Lane. Due to the building being set relatively close to all site edges, the appearance of the ground floor will be highly visible. The rear of the building is proposed to sit on lower ground than the highway land, and would be separated from the highway by way of a retaining wall within the site and landscaping.

7.46. The applicant has sought to provide other visual interest along the frontage following officer concerns around lack of active uses at ground floor level. Figure 19 shows the uses at ground floor for each frontage. This clearly shows the predominance of functional areas. The corner of the building nearest London Street would have the most active frontage, with the gym/wellness facility, shared home working spaces, lobby, and the 'cycle hub'. The remainder of the ground floor areas are for refuse and plant. The applicant has sought to provide glazing to plant rooms to add additional activation, though it is not considered that glazing these areas would achieve activation in the same way. The refuse stores are proposed to be clad in patterned louvres, which are sought to be designed with local artist.



Figure 18 - Proposed entrance feature CGI (left); Proposed patterned louvres to refuse store

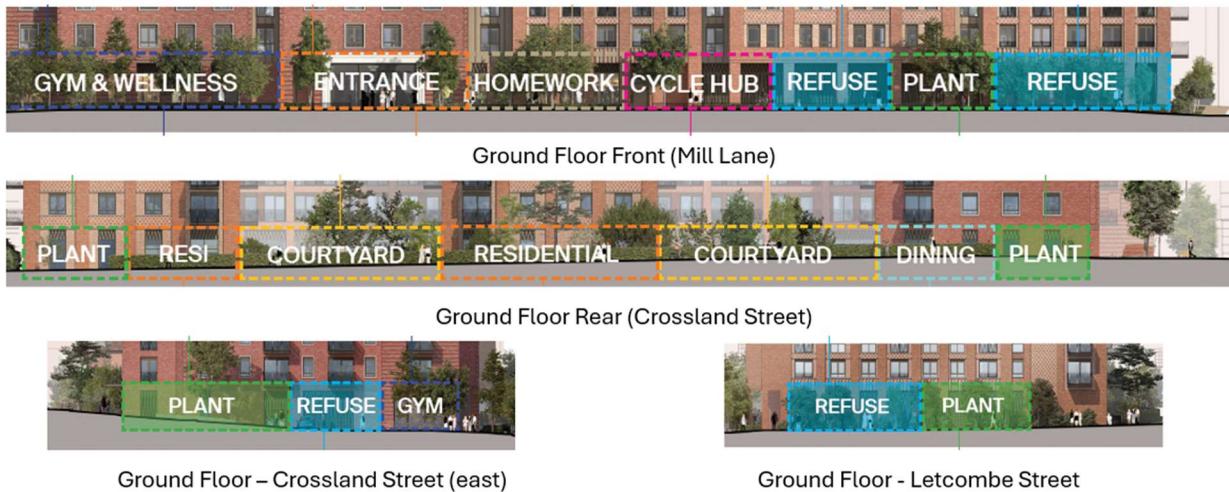


Figure 19 - Ground Level elevations with uses shown

- 7.47. The materials proposed include a mix of brick colours. The indicative materials details include a range of handmade bricks for the external of the building, which have consistently been put forward as being of high quality. The Applicant has confirmed via e-mail on 29/9/2025 that they are unable to confirm the specific brick details at this time. This is an important point put forward throughout the application, and a condition will secure details, and samples of brickwork, and on-site sectional mock-ups to ensure a high quality finish would be achieved. This would be necessary to ensure the proposed materiality of the development would relate closely to the area to ensure quality and authenticity due to the impacts a lesser quality construction methodology may have on the eventual appearance of the building.
- 7.48. The proposal appears to be a fairly standard design and construction method whereby a series of rectangular elements are stacked and built upon with 'ins and outs' to provide visual interest. This undoubtedly is easily constructable to minimise construction costs, this is not objectionable in isolation. The built form, in scale and mass would also be visually dominant, it contains a largely unbroken frontage and roofline with articulation relied upon to visually break up the mass of the building, rather than employing a significant stepping of built form either horizontally or vertically. The imagery of the building shows that the proposed form, and scale with the architectural elements would represent a good quality of design that would look appropriate to its scale.

Architecture summary

- 7.49. There are concerns regarding the height, scale and massing of the proposal with the wider area. Furthermore, the provision of balconies and access decks across the rear of the proposal (Crossland Road) are uncharacteristic elements within the proposal, creating an awkward relationship between properties. The base of the proposal contains predominantly non-active uses, with bin stores, bike stores and plant rooms behind a colonnade. The front and sides of the proposal lack sufficient activation to present overly well to the public realm and form a poor aspect of the design. This is somewhat hidden by the colonnade feature, though this element is equally not a feature present within the area.
- 7.50. The proposal does demonstrate attention to detail and high quality design at upper levels through intricate brickwork detailing, which will be recognisable from street level. Some details, such as the brickwork detail at the parapets, would be less visible at human scale. It would create shadows that would be distinguishable to from street levelling to allow appreciation of the architecture. The red brick and metal cladding combined with the windows glazing detail integrate with the upper floors well and ground the proposal. The main entrance to the proposal is clearly legible and identifiable with a high level of glazing, and prominence that should be given to a main entrance.

Density

7.51. In addition to Policy CC7, Policy H2 (Density and Mix) require all development to be appropriate in terms of density relative to the character of the area in which it is in. With Policy H2 seeking to ensure density is appropriate for the accessibility of the area, and make efficient use of land, as well as providing high quality design and minimising impacts on neighbouring amenities.

7.52. In density terms, the provision of 170 residential units on a 0.44 hectare site produces a density of development of 386.36 dwellings per hectare (dph). The proposal therefore represents a very high density proposal; far beyond the minimum 'above 100' dwellings per hectare density indicatively specified at figure 4.5 of Policy H2 (Density and Mix) of the Local Plan. Policy H2 however clearly recognises that the appropriate density of residential development will be informed by a range of factors. The need to maximise the efficiency of land and delivery of dwellings is to be balanced against the design policies, and heritage matters to be discussed elsewhere within this assessment. The density of the proposal is significantly in excess of the surrounding density of the area. The proposal is closer to the density of the proposed residential element of The Oracle proposals across the IDR, which is yet to be determined. For reference, the following proposed or granted applications are noted for their densities: The Oracle Proposals ~400dph; Station Hill North – 474dph; 55 Vastern Road ~275dph; 45 Caversham Road ~266dph.

7.53. In isolation the density compared to the accessibility of the area, and making efficient use of brownfield land would be in line with Policies H2, CC7 and NPPF which can be afforded substantial weight in line with paragraph 125(c) of the NPPF. However, the density results in significant built form and height as discussed above as being objectionable.

Landscaping

7.54. The application site contains 10 trees along the Mill Lane frontage which are in a reasonable condition. The hedging to the front and rear are also of reasonable quality. All existing landscaping is not a significant inhibitor to the development of the site, subject to suitable replacements (both in number and quality).

7.55. The submitted landscape strategy includes urban greening, amenity provision, and biodiversity enhancement. The landscape design is structured around four distinct character sections, Mill Lane, Communal Garden, Letcombe Street, and Crossland Road. The communal gardens incorporate community growing spaces, informal play, and private terraces. Tree planting includes 47 new specimens, selected for shade tolerance, biodiversity value, and provides a good diversity of species. The proposal is to include at least 50% native species.

7.56. The plan shown in Figure 13 below indicates significant planting along all frontages. Due to the slopes of the land, the site proposal includes instances of cut and fill with the ground floor to be in between the road level of Mill Lane and Crossland Road. In addition to the landscaping along road frontage, the proposal includes internal courtyards between the three rear projections of the building. These areas contain a variety of landscaping and seating to the benefit of residents. The site is proposed to have controlled access to internal areas, aided by the change in level which creates a hard barrier between highway users and the internal spaces. The roof of the development is also proposed to contain a 'brown roof'. This is a space of substrate that would enable self-vegetation via windblown or dispersal via birds.



Figure 20 - Landscape Plan Extract



Figure 21 - Section Plan of site from Mill Lane to Crossland Road

- 7.57. The proposed landscaping would provide some softening to the brick sides that will be imposing to those at street level. Along Letcombe Street, a 2.5m area for planting would include 7 trees. This would be a fairly limited amount of space to provide trees with a large crown spread. The Mill Lane frontage would provide a greater amount of trees, with it set within a mix of hard and soft surfaces. This should provide sufficient room for trees to grow to a reasonable size. Along Crossland Road, the provision of a good sized area, with a hedge atop the retaining wall, and landscaping below would also present well to the street. The end of Crossland Road includes 3 trees, within relatively small landscaped areas. One would be provided sufficient room to grow to a reasonable height, whereas two are directly below a first floor balcony, and within a small space, this would limit its practical height and spread.
- 7.58. In accordance with paragraph 5.24 above, RBC's Planning Natural Environment (Tree) Officer retains reservations around the schemes practical implementation, with the potential the balconies could obstruct trees, and that alternative species that could avoid balconies would reduce the overall quality of landscaping associated with the scheme.
- 7.59. The internal courtyard areas include a mix of raised planting, and furnishings in an aesthetically pleasing arrangement.
- 7.60. With areas containing hard surfacing in black tarmac, and a no street furniture. The existing area has some good examples of landscaping, and any scheme would be expected to maximise the landscaping on the site. The landscaping scheme and strategy is considered to positively set the building (notwithstanding other points made within this assessment) and contribute positively to and improve the character and appearance of the area.

- 7.61. In conjunction with the RBC Natural Environment Team's observations at paragraphs 5.24. above, the scheme includes some welcomed greening on-site, within the provision of a 'brown roof' providing some biodiversity benefit. The proposal would improve the quality of accommodation for future occupiers, as well bringing biodiversity, thermal efficiency and reduce run-off benefits. The streetscape landscaping, particularly to Mill Lane would be managed by the Applicant and secured through the legal agreement.
- 7.62. The proposal is considered within the context of the existing setting of the site. The proposed development is considered to improve vastly the existing situation, so long as feasible landscaping can be achieved. There are potential conflicts with the trees proposed, and the proposed balconies in several locations around the scheme. The multiple sets of detailed plans also have some inconsistencies relating to the proposed landscaping, including to the eastern end.
- 7.63. Conditions may be suitable to secure the details as proposed, however it has not yet been satisfactorily demonstrated that all landscaping is achievable due in part to conflicts between the proposed species of trees and proposed balconies. An update report will be provided detailing any resultant amendments to the landscaping scheme for the site once details are available.

Conclusion

- 7.64. The overall scale and bulk of the proposal remains a significant concern. Officer's consider that the eight-storey maximum height and stepping down around the site is considered to be out of keeping with the prevailing character of the area, where all buildings around the proposal are of a lower scale. The transitions in height, particularly adjacent to Letcombe Street and Crossland Road, are relatively pronounced and would result in a built form that appears visually dominant in parts. The limited use of setbacks in key locations contributes to this perception.
- 7.65. The proposed development demonstrates a commendable level of architectural detailing and material quality, with clear references to the London Street Conservation Area. The use of textured brickwork, varied roof forms, and refined detailing contributes positively to the overall appearance of the scheme. The articulation of the façade, recessed elements, and rooftop treatments help to break up the massing and provide visual interest. The design also incorporates active frontages and landscaping that enhance the public realm and respond to the varied urban grain of the surrounding area. As detailed above, the LPA is concerned that the eventual build quality could be diluted through the construction process. Sufficient scrutiny will be applied in future through securing details of materials by condition.
- 7.66. While the architectural quality and materiality of the proposal are considered to be high, and the scheme makes efficient use of a brownfield site with good access to transport, these benefits are moderated by the harm caused by the excessive scale and massing. The proposal, as detailed above would also result in less than substantial harm to a number of heritage assets. On balance, the proposal would result in moderate harm to the character and appearance of the area and low level of harm to the heritage assets, which must be weighed carefully against the wider planning benefits and policy objectives.

iii) Quality of Accommodation for future occupiers

Proposed Residents

- 7.67. The application site lies on the edge of the IDR, a busy road which is a key route within and through Reading. This area is stark, with hard surfacing, and would result in noise as well as rebounded noise from the Oracle carpark. The proposal for residential development in this location is challenging with managing these impacts creating complexities in design. The northern portion is where the bulk of the flats are proposed looking on to the IDR. This is an unfortunate outlook, albeit that open views of the sky would be visible. The flats to the rear, would have a good outlook over the conservation areas meandering buildings along London Street.

7.68. The proposed layouts have been attempted to design with regard to light. Limited single-aspect north-facing units are proposed (4 per floor 2-6; 2 per floor 7-8), with dual-aspect sought to be maximised where possible. The layout of rooms has sought to minimise overlooking between future occupiers at the application site. The proposal includes a 20m window-to-window separation distance for units facing one-another between the protruding elements, which is the distance contained within the guidance provided for back-to-back distances between residential uses in Policy CC8 and is deemed to be acceptable.

7.69. The arrangements of units is not optimal. Though bedrooms are generally provided to the IDR. The importance of appropriate noise protection from glazing will be required, and can be secured by condition. Though this would limit the amount of time windows could be opened. The long narrow flats access via the decks would be 4m x 15m inevitably resulting in a lack of light (as discussed below). The privacy of these would be also slightly diminished through the walkways. Outlook would be reasonable, though would be subject to some overbearing by the access'. These narrower flats would present a less desirable layout compared to others within the proposal.

7.70. The affordable housing units have been annotated on the most recent plans (note that this section will consider both LHA and DMR). Two ground floor flats are proposed as affordable, these flats would have some degree of privacy issues as a result of the communal space, though a scheme to ensure sufficient defensible space is proposed. Seven of the affordable flats would be north facing, with views on to the IDR, these are notably some of the poorer quality flats. Five of the affordable units are the rear corner toward Crossland Road/London Street. These flats would have dual aspects and good outlook. Eight further affordable flats are on the Letcombe Street end, facing either west or onto the internal courtyards. These flats are considered to be generally pleasant flats. Two flats are provided adjacent to the nib facing Central Club. These flats are also provided with good outlook and face east.



Figure 22 - General floor arrangement 1-5 (highlighted are affordable units)

7.71. All of the 170 units comply with the nationally-described space standards (Policy H5a), with the units being regular in size and shape, with reasonable outlooks. The residential units are located on ground to floor eight of the building and will be served by three separate cores (two to eight-storey). The ground floor provides support services typical of build to rent developments, such as a lobby, gym/wellbeing, home working, and shared dining/living areas.-Future occupiers will also be protected from the effects of overheating, noise disturbance and potential contaminated land through a variety of conditions recommended by RBC Environmental Protection (see paragraph 5.18 – 5.26 above). Specifically in terms of air quality, the applicant has demonstrated sufficient mitigation is included within the proposed design to result in no harm being caused to future occupiers.

With regards to wind and microclimate matters, Arc Aero's assessment on behalf of officers, as per paragraphs 5.29 - 5.29 above, demonstrate that conditions will be suitable for future occupiers and the public users of the surrounding area.

7.72. The proposal does include four no. ground floor residential units. These units would be provided with windows facing both the internal courtyard areas (shared communal outdoor space; and access pathways to the proposal. Each ground floor unit is shown with a private outdoor space with a gate to the communal outdoor space. These are proposed to be provided as defensible space by way of railings and planting. The windows which face onto communal walkways and accessways, obscure glazed to a certain level for bedrooms, with heavy planting to ensure defensible space. This is a shortfall in privacy to these units, this shortfall can be accommodated in this specific context in the overall planning balance.



Figure 23 - Ground floor flats, and defensible space for outdoor amenity

Daylight and sunlight – Proposed Residents

7.73. With regard to daylight and sunlight for future occupiers, BRE's findings of the information submitted by the applicant is summarised at paragraph 5.30 - 5.34 above, also incorporating Figure 5. It is evident that there are shortfalls in the provision of both daylight and sunlight for a number of the proposed dwellings, particularly for the living rooms with access via the openair walkways. There is a degree of inevitability as the proposed layout incorporates a series of protruding elements, which invariably reduces access to daylight.

7.74. The access to daylight and sunlight is of concern. As detailed by BRE, the layout of the development has caused a number of the issues present. Figure 24 shows the first floor plan with the daylight/sunlight afforded. It shows that the long narrow flats off the access decks perform generally worse than a number of flats due to the overshadowing from the access'. The north side of the flats, and the external sides generally perform well. Though those facing onto the courtyard, due to orientation would have less sunlight/daylight.



Figure 24 - Extract from daylight/sunlight appraisal showing quality of daylight to flats

7.75. In this regard, there are evidently competing demands between the need to comply with, and provide access to two stairwells for fire purposes, and the resultant access arrangements, and the need to provide suitable access to natural light. Although disappointing, there are competing demands between building regulation requirement and access to daylight, as well as the need to avoid openings toward the IDR. The quality of accommodation, whilst spacious and otherwise provided with good access results in a reasonably dark set of flats where living areas are generally suffering. Bedrooms are provided with sufficient daylight/sunlight.

Accessibility and Wheelchair Users

7.76. As per paragraph 5.22 above, the RBC Access Officer raised concerns with the proposal and sought clarification on a number of matters. The Applicant has provided a detailed response to all queries. Notably, with regard to waste matters, the Applicant has advised that concierge services will be made available to all residents with the ability to assist and provide person-centred options where necessary. With regard to parking and other transport matters, the proposal does not include any on-site carparking. Access to on-street parking would be restricted for most. An accessible parking space may be requested through a separate process, with sufficient on-street area to provide this.

7.77. Policy H5f (Standards for new housing) requires at least 5% of new build dwellings to be wheelchair user dwellings. In this instance, the applicant has shown 4 x 2-bedroom units, and 5 x 3-bedroom units to be wheelchair accessible. This equates to a 5.29% provision, in excess of the policy requirement. In order to ensure that the applicant fully implements the intended measures, a planning condition will secure final details of 9 'wheelchair accessible', prior to the first occupation of any of the 170 units at the site. The Applicant has also suitably confirmed that the remainder of the residential accommodation will be accessible and adaptable in line with Part M4 (2) of the Building Regulations, in line with Policy H5e.

Other Policy H5 requirements

7.78. Previous paragraphs have demonstrated compliance with Policies H5a, e and f. It is also confirmed that Focus' sustainability review (on behalf of the LPA) confirms that the

proposal meets the water efficiency standards under Policy H5b. In terms of H5c (major new-builds to achieve zero carbon), Focus' energy review and officer's subsequent assessment, as discussed separately below, confirms that whilst zero carbon is not achieved, the proposals will exceed the minimum 35% improvement in regulated emissions over the Target Emissions Rate in the 2013 Building Regulations. Policy H5d is not applicable in this instance. Hence, in overall terms, the proposals have demonstrated compliance with all relevant Policy H5 standards for new housing.

Open Space

7.79. In terms of open space for residents, all occupiers will have access to the proposed communal open space at ground floor. As per sunlight analysis by BRE (see paragraph 5.33 above) the ground level open space would be sunny and includes areas of seating, 'playable landscape features', raised planters, and a shared barbecue space. Moreover, 59 (34%) of the residential units includes its own individual private terrace space in the form of projecting balconies, with all four ground floor flats provided with a private amenity space with defensible enclosure for privacy. The size of the shared communal space is considered the minimum that would be acceptable for the number of flats proposed and is acceptable as a shared amenity space. The proposal therefore complies in full with Policy H10 (Private and Communal Outdoor Space). In terms of wider open space at the site, mindful of Policy EN9 (Provision of Open Space) and the proposals including more than 50 dwellings where new provision is sought. No new space is realistically able to be provided in this instance owing to the size of the site, the nature of the proposals and the existing surrounding context. In this instance, it is considered necessary to secure a contribution towards off-site improvements of local public open spaces. The applicant has engaged with Katesgrove Community Group to put forward a scope of works for improvements to the County Lock Area including.

7.80. It is noted that RBC's Neighbourhood Services Project Officer is providing a detailed scope of work with the above as a guide. Some works mentioned above are outside of Council ownership and may not be achievable. These works will be secured through a contribution of £60,000 through the s106 agreement.

Fire Strategy

7.81. As a 'gateway one' building (owing to the proposed height) the applicant has submitted a Fire Strategy with the application. The Health and Safety Executive (HSE) was formally consulted on the application and the revised submission. The HSE has responded that they are 'content' with the fire safety design of the proposed building. It is noted that further regulatory approval will be required with regard to fire safety. The Royal Berkshire Fire and Rescue Service also provided comments, and did not raise specific objections or concerns (see 5.9).

Mix

7.82. Policy H2 also seeks to provide a mix of dwellings on sites. Policy CR6 seeks requires a maximum of 40% of units for developments within Central Reading be 1-bed/studios, and a minimum of 5% to be provided as 3-bed (or more).

7.83. In terms of the mix of residential units proposed, as specified in full within paragraph 3.2 above, the proposal does not fully comply with Policy CR6i). The scheme provides a mix of different sized units, with a total of 79 units (46%) being 1-bedroom units. The proposal does include more than the minimum 5% 3-bedroom (5.8%) units. In terms of unit mix, whilst it is acknowledged that the one-bedroom units are in excess of the requirements of policy representing harm in terms of overprovision of one-bed units.

Conclusion

7.84. Overall, the provision of a good level of accessible units is considered a benefit of the scheme. The outlook provided to all flats is also positive, though the flats with direct outlook over the IDR only would be not as desirable as those overlooking the conservation area. The provision of a good quality of communal open space would also be positive.

7.85. There is a mixed level of daylight/sunlight provided to the flats across the scheme. In town centre location this would be more expected, and usually the result of taller buildings overshadowing proposals. The proposal however, would not provide a good level of daylight/sunlight to a large number of flats. This is predominantly due to the layout of the development with the access decks inhibiting light. The over-provision of one-bed units is also a negative aspect of the proposal.

iv) Amenity for nearby occupiers

7.86. As noted above in various sections, the application site is surrounded on all side by highway. Though a dense urban area, the site is separated from all neighbouring sites by some distance. The application would remain to be carefully considered in terms of its impacts on existing/future nearby occupiers, mindful of policies such as CC8 (Safeguarding Amenity) and CR6 (Living in the Central Reading) in particular.

Privacy and overlooking

7.87. To the north of the site is the IDR, with 30m to the opposite side. There would be no concern from any north facing windows on existing or proposed units, nor the proposal itself on this side of the proposal. To the west, the Premier Inn is located 14m from windows on the proposal. Saxon Court is 17m from the nearest window/balcony, Townsend House is 23m, and the permitted development at the Central Club site is 15m. Windows facing the highway, and being opposite other windows also facing the highway is considered to be a standard relationship between buildings. Depending on the highway width, this could result in windows closer than the 20m guidance. In this instance, the minimum 14m is considered sufficient that, though direct overlooking could occur and the potential for harm is evident, this is an expected relationship for units (albeit that the proposal is an addition to the existing area). Therefore, the proposal is not considered to result in harmful overlooking, or be subject to harmful overlooking from existing residents.

7.88. Within the development, the proposal would include some overlooking between communal areas and the ground floor flats. The landscaping proposed, and window treatments to an appropriate height would be secured by condition and will mitigate the potential harm to residents as a result of this privacy concern.

Daylight and sunlight

7.89. The BRE undertook an assessment on behalf of officers in terms of the supporting information submitted by the applicant, as summarised at paragraphs 5.30 - 5.34 above. The guidelines assess loss of daylight (diffuse light from the sky) and loss of sunlight (direct light from the sun) separately and are designed to be used for the assessment of the impact on habitable rooms on the existing dwellings (living rooms, kitchens and bedrooms). BRE advise that there would be a minor adverse impact upon 1-16 Deansgate Road (flats), Townsend House (specialist residential accommodation), and the approved Central Club site. The review also highlights a moderate impact upon Saxon Court in terms of daylight (not sunlight due to orientation).

7.90. With regard to Saxon Court, the moderate impacts are considered against the layout of the flats within the building. These flats are all very small studio apartments, they are in use as general C3 residential flats, not dedicated student accommodation. However, it appears anecdotally that they are mostly let to students. The proposal adversely affects 38 of the 51 measured windows on the northern elevation. These windows serve a total of 10 flats. The ground floor level has four narrow flats served by two windows each (although a large number of velux windows), the first and second floor contain three flats each, with two of those containing a significant number of windows. All flats have combined living and sleeping areas, with no alternative access to daylight. The impact therefore is considered to be a significant impact upon these flats, and would weigh against the proposal.

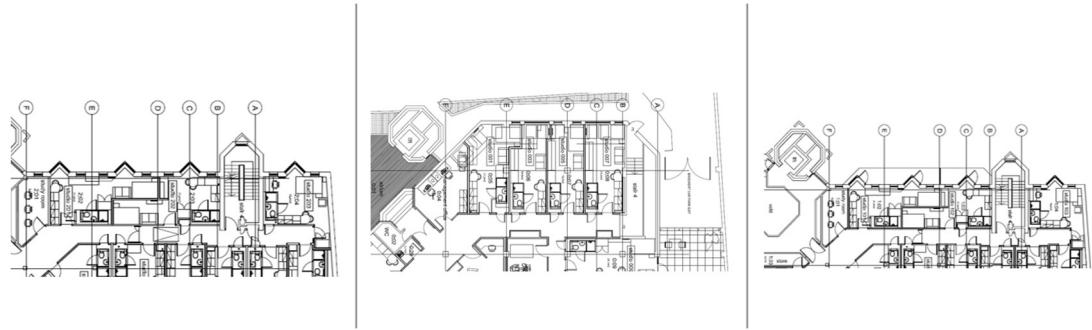


Figure 25 - Layout of Saxon Court flats impacted by the proposal

7.91. In considering outlook, visual dominance and the overbearing effects of a development, given the proposed scale and massing of the proposed development, it is readily acknowledged that all neighbouring and nearby occupiers will experience a new relationship with the site when compared with the existing arrangements. Though given the location and distances all existing residents would retain a good level of outlook.

Conclusion

7.92. The proposed development, as a result of the scale and bulk would result in some harm to neighbouring properties. There would be a level of impact as a result of the development of the site, though a proposal closer to the draft local plan review (76-110 dwellings) would likely result in less bulk and scale with lessened impacts. The impacts would be concentrated upon Saxon Court in the highest degree of loss of light (moderate impacts) with 10 flats effected. Though, as above these flats would have limited opportunity to seek alternatively well lit areas. This is coupled with the poor quality of accommodation already given to those residents. Overall, this would be only a slightly negative impact on surrounding neighbours and would not weigh significantly against the proposal.

v) Affordable Housing

7.93. Policy H4 (Build to Rent Schemes) requires Build to Rent schemes to provide 30% on-site affordable housing, either in accordance with Policy H3 (Affordable Housing) or in the form of Affordable Private Rent Housing, as per the Affordable Housing SPD. For a scheme of 170 residential units, the policy compliant amount equates to 51 affordable units on site. The applicant seeks to provide 17 on-site Affordable Private Rent units at Local Housing Allowance (LHA) levels, and 10 on-site Affordable Private Rent units at a discounted market rate (DMR) (80% of market rents), which translates into a 10% on-site provision at LHA, and 6% at DMR. Moreover, the applicant has also agreed to the various stipulations required by Policy H4 and the Affordable Housing SPD.

7.94. Paragraph 4.4.19 of the Reading Borough Local Plan provides is the supporting text to the policy and summarises the large amount of evidence that the Council has in respect of the critical need for Affordable Housing that exists within the Borough:

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

7.95. RBLP para 4.4.23 states “*The target set in the policy has been determined as the result of an assessment of the viability of development of sites of various sizes in the Borough in accordance with the requirements of the NPPF. This will be the expected level of affordable housing provision.*”

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

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

7.97. Current Policy H3 includes provision for viability considerations at para 4.4.24 which states that “*...the Council will be sensitive to exceptional costs of bringing a site to market such as for reasons of expensive reclamation, or infrastructure costs, or high existing use values. Where applicants can demonstrate, to the satisfaction of the Council, exceptional difficulties in bringing a site to market, the Council will be prepared to consider detailed information on the viability of a particular scheme and, where justified through an open book approach, to reduce the affordable housing requirement...*”

7.98. The NPPF and the Council’s policies allow for viability considerations to reduce the provision but only in specific circumstances. Paragraph 59 of the NPPF 2024 states that “*The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force.*”

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

7.100. In support of the application, a financial viability assessment has been submitted by the applicant, seeking to justify a reduced contribution toward affordable housing. This viability appraisal has been reviewed by the Council’s Valuer, and a third party reviewer.

7.101. The viability considerations that have been presented indicate that the proposed development has profitability issues; in fact, the proposal would generate a significant deficit in the absence of any affordable housing contribution, to an extent where it is not the Council’s affordable housing policy requirement which is making the development unviable. The development may not necessarily come forward in the market with such a viability position in any event. It should be noted that deliverability of a scheme may be a consideration in development proposals where the benefits of a scheme are time limited. By virtue of any timeframe applied to a permission (if granted – 3 years), the delivery of housing, a key benefit of the scheme, is therefore time limited. It is noted that the applicant has stressed their commitment to delivering the development, and their intention to

implement any permission promptly. It should be noted however that the LPA has no control over whether a development is commenced, nor can a condition be applied to ensure completion. It is noted by officers that the Council's annual monitoring report, for the period 1 April 2024 – 31 March 2025 identifies 4,371 dwellings with planning permission that have not commenced. This demonstrates high levels of permissions, with the non-delivery of housing directly affecting to housing supply in Reading. It is also noted that at the time of writing, Reading is currently considered to be meeting its RBLP housing targets.

7.102. Officers and the Applicant engaged during the application process through a linked planning performance agreement (PPA) to enable ongoing discussions and negotiations on the scheme. Through this process, the scheme was revised to a reduced scale and quantum of development. This final offer was made to Officer's for 17 units (10%) at LHA level; and 10 units (6%) at DMR level (80%) market rent. The revised affordable housing offer has been reviewed by RBC's valuers who confirm that the offer equates to 12.58% onsite delivery resulting in a 17.42% Shortfall of policy targets. The below rent levels have also informed the Applicant's viability appraisal. RBC's valuers have also sought to indicate approximate affordability of the 80% market rent units, for example, a 1b2p DMR flat would result in an annual rent of £16,320. With a couple requiring a combined income of £46,628 to be considered as reasonably able to afford this rent (using the common benchmark of 35% of income spent on rent). Similarly, a 2b3p DMR flat would require a minimum income of £56,228, while a 3b5p flat would need £72,685.

Updated affordable housing provision - 16% Affordable Housing with 10 DMR units at 80% of MR and remaining at LHA Levels

Unit Type	Total	Affordable				Market				DMR @ 80% of MR		DMR @ LHA Levels		
		Market	Affordable	Affordable Unit Mix (%)	DMR @ 80% of MR	LHA Levels	Monthly rent	Annual rent	Monthly rent	Annual rent	Monthly rent	Annual rent	Monthly rent	Annual rent
1B1P	19	19	-	0%	-	-	£ 1,500	£ 342,000	£ 1,200	£ -	£ -	£ -	£ -	£ -
1B2P	60	48	12	44%	5	7	£ 1,700	£ 979,200	£ 1,360	£ 81,600	£ 848	£ 71,206		
1B2P WA	-	-	-		-	-	£ 1,700	-	£ 1,360	-	£ 848	£ -		
2B3P	35	25	10		4	6	£ 2,050	£ 615,000	£ 1,640	£ 78,720	£ 1,092	£ 78,624		
2B4P WA	4	4	-		-	-	£ 2,250	£ 108,000	£ 1,800	-	£ 1,092	£ -		
2B4P	42	42	37%	19%	-	-	£ 2,250	£ 1,134,000	£ 1,800	-	£ 1,092	£ -		
3B4P	5	5			-	-	£ 2,650	£ 159,000	£ 2,120	-	£ 1,296	£ -		
3B5P	5	-	5		1	4	£ 2,650	-	£ 2,120	£ 25,440	£ 1,296	£ 62,229		
Total	170	143	27		10	17		£ 3,337,200		£ 185,760		£ 212,059		
AH %			16%				OPEX	£ 834,300	Total Affordable Annual Rent				£ 397,819	
					Total AH Units	27	per unit	£ 5,834						
									LHA OPEX	£ 99,183				
									DMR OPEX	£ 58,343				

Figure 26 - Rent levels as per Applicant viability assessment

7.103. The Local Plan is clear that the proposed affordable housing element should make a contribution to meet the needs of Reading. Paragraph 4.4.26 of the RBLP advises that the need within Reading there was a need for 70% of affordable housing to form social rented/affordable rent. The Local Plan Partial Update Submission Draft (May 2025) (LPPUSD), and its supporting documents are considered to be a more up to date explanation of the current housing need within Reading. It similarly seeks at least 62% of affordable housing to be provided in the/ Affordable Rent tenure. The supporting documentation presented with the LPPUSD (May 2025), being the Local Housing Needs Assessment: Reading (July 2024), is clear that the vast majority of local need is in the form of social rented housing. However, DMR would still comply with the NPPF and Planning Practice Guidance (PPG) definition of 'affordable housing'.

7.104. The applicant has stated that the Affordable Private Rent housing would be 'tenure blind', with all units to be fitted to the same standard as all other units. The units will be 'pepper-potted' through the development, thereby assisting in the creation of a mixed and balanced community. More specifically, the affordable units are spread across second to fifth floor levels, Table 1. In addition, as per Figure 7, there is a range of unit sizes provided in the affordable tenure, from one-bed to three bed units.

7.105. Due to the viability position, and the potential that viability may improve over the period of development. It is considered necessary to secure a late-stage review mechanism within the s106 to capture uplift as a payment in lieu. The late stage review is agreed as a 50/50 profit share based on the agreed figures mentioned above, it would be capped at

an amount equivalent to the policy compliant 30% affordable housing equivalent amount (30% LHA).

Conclusion on affordable housing

- 7.106. The proposal has been considered against the requirements of Policy H4 (Build to Rent Schemes) and Policy H3 (Affordable Housing) of the Reading Borough Local Plan, as well as the relevant guidance in the Affordable Housing SPD and the NPPF. While the scheme does not meet the full 30% affordable housing requirement set out in Policy H3/H4, the applicant has provided a viability assessment which has been independently reviewed by the Council's Valuer and has been accepted by your officers. This demonstrates that a higher level of affordable housing would represent challenges with delivery of the scheme, despite an unviable overall position (including without any affordable housing).
- 7.107. Following negotiation, the applicant has revised the scheme to include a total of 27 affordable units (17 at Local Housing Allowance levels and 10 at Discounted Market Rent), equating to 12.58% in terms of LHA level rents. Although this falls short of the policy requirements and therefore would not be considered policy compliant, the proposal does offer a meaningful contribution to affordable housing in Reading, particularly in the form of LHA rental level units. In addition, securing a DPM within the s106 package would enable up to policy compliant provision (through financial contribution) should the viability of the scheme improve whilst the proposals are being implemented (though the terms are not yet agreed between the parties).
- 7.108. Given the critical need for affordable housing in Reading, as evidenced in both the Strategic Housing Market Assessment (2016) and the Reading Housing Needs Assessment (2024), the shortfall in provision must be weighed carefully. The scheme's contribution to housing delivery, its alignment with the principles of mixed and balanced communities is a material consideration.
- 7.109. In the planning balance, positive weight should be given to the affordable housing provision, acknowledging the viability constraints and the positive steps taken to maximise delivery within those limits.

vi) Infrastructure Matters

Healthcare Infrastructure

- 7.110. Policy CC9 seeks sufficient infrastructure (including health care) for developments. The NHS ICB BOB has provided a response noting an objection to the proposal due to failure to mitigate the impacts of the proposed development on local infrastructure (healthcare facilities). It is noted that CIL funding may go toward this type of infrastructure, however, CIL funding is allocated on a larger scale and is unlikely to directly offset the impacts of the development on local healthcare provision. The provision of a contribution to be secured by s106 is considered to meet the relevant tests mentioned below (**Error! Reference source not found.**). The Applicant has agreed to include the contribution of £146,880 within the s106 agreement. The proposal is therefore considered to comply with Policy CC9 (Securing Infrastructure) of the RBLP in this regard.

Legal Agreement

- 7.111. A number of the matters already discussed in this assessment will be secured in full via the S106 Legal Agreement, such as securing the 143 market residential units as Build to Rent properties, securing 17 Units as Affordable Private Rent Housing (LHA) units, 10 units as Discount Market Rent (DMR) units and all the associated matters in those regards (including if the site is extended/altered to create further residential units), and securing a deferred payment mechanism for up to the remaining policy compliant affordable housing levels as a payment in lieu; a residential management plan; a contribution toward offsite public open space enhancements; and the Zero Carbon Offset financial contribution. In addition, the scheme is also required to secure a construction stage Employment and Skills Plan (ESP); provision of an on-street car club space; multiple TRO/s278

requirements; and an NHS contribution. Furthermore, the legal agreement will also be subject to the usual monitoring costs, terms and conditions and indexation rates.

7.112. It is considered that each and every obligation, as also summarised at the outset of this report, would comply with the National Planning Policy Framework and Community Infrastructure Levy (CIL) in that they would be: i) necessary to make the development acceptable in planning terms, ii) directly related to the development and iii) fairly and reasonably related in scale and kind to the development, as set out in the National Planning Practice Guidance. The Heads of Terms have been agreed with the applicant and a Legal Agreement is in the process of being prepared to secure these matters

vii) Sustainability and Energy

7.113. The application falls to be considered under the current RBLP policies relating to energy and sustainability. Policy CC2 (Sustainable design and construction) requires all development to demonstrate efficient use of resources (energy, water, materials) taking account of the effects of climate change. Policy CC3 (adaptation to climate change) goes further, seeking additional measures to be incorporated into developments (summary):

- Wherever possible ... maximise the opportunities for natural heating and ventilation...
- ... maximises resistance and resilience to climate change by including measures such as solar shading, thermal mass, heating and ventilation of the building and appropriately coloured materials in areas exposed to direct sunlight, green and brown roofs, green walls, etc;
- Use of tree and other planting to provide shading of amenity areas and streets,
- Provision of sustainable urban drainage to minimise impacts of water runoff

7.114. Policy CC4 also seeks to ensure development of the scale proposed demonstrate how consideration has been given to securing energy from decentralised energy sources, or include decentralised energy (subject to feasibility/viability), including linking into nearby sources. Policy CC9 gives high priority (where relevant) to securing decentralised energy projects. Policy H5 (Standards for new housing) seeks that all new development be built to higher water efficiency standards under Building Regulations (as at 2019), and that all major new-build development be designed to achieve zero-carbon homes. The Sustainable Design and Construction Supplementary Planning Document (SPD) details further how zero-carbon development will function. Including a minimum 35% improvement of the dwelling emission rate with the remainder to form an offset contribution. Though, the priority is the provision of a true zero-carbon development.

7.115. Considering specific sustainability matters first, the submission includes a Sustainability Statement and Sustainability – Energy Statement prepared by Hoare Lea (revised to reflect most recent proposals (August 2025). This has all been assessed by Focus on behalf of officers, as summarised at paragraphs 5.38 above. It is noted that Focus' review originally raised a query, however this was responded to, and agreed in correspondence. It is noted that the offset contribution currently calculated is £89,280, though a recalculation at a later stage will be included within the s106 agreement.

7.116. Policy CC4 (Decentralised Energy) seeks that proposals of more than 20 dwellings 'consider' the including of decentralised energy unless it can demonstrate that the scheme is not suitable, feasible or viable for this. In addition, where there is existing decentralised energy, consideration of connecting to the network should be included or demonstration why this is not feasible.

7.117. The Applicant has included solar panels within the scheme which is considered a form of decentralised energy under the SPD. The proposal therefore includes an element of decentralised energy.

7.118. The Applicant also sought to engage with RBC's Sustainability Manager to seek further information on the proposed district heat network. These discussions occurred, and it was determined that the heat network, though likely to run in front of the application site, would not be delivered in time to allow the development to connect with certainty. A further response will be provided in an update report for the conclusion of this point.

Conclusion

7.119. The proposed development is designed with a fabric first approach to maximise the efficiency of the building. This is demonstrated through the 70+% increase upon the required sustainability measures, well above the minimum 35% outlined within the SPD. The optimal option would be a zero-carbon development, however the SPD supports contributions to offset what cannot be achieved on site. This aspect is considered positive in the overall balance.

viii) Transport and Highways

7.120. The application site, by virtue of its location is afforded access to a range of public transport options for future residents. The proposed development is car free, which is wholly supported by RBLP policy, and Reading Transport Strategy (2040). The car free nature would also support Active Travel England objectives that aims to divert trips to walking and cycling, which would be most daily trips for residents of the proposed development. The need for car, would be offset by the provision of a car club space, and s106 terms in relation to this. There may be other private arrangements that could be made by tenants with private parking operators.

7.121. The Application removes an existing access to the existing customer parking area. This would necessitate the amendment of the double yellow line marking in this area, and reinstatement of the kerb. The proposal would also alter the highway land in part, the ownership boundary and development have sought some minor amendments to the far end of Crossland Road. This would include additional highways land to ensure footways around the proposal would be in highways management. These amendments would be secured through the s106 and undertaken through appropriate stopping up or traffic regulation order. The proposal would also include balconies which over sail the highway in parts. The Applicant has been further advised that they would need to apply for an over sail license, though it is expected that there would not be significant issue with this.



Figure 27 - Extract showing highways extent

7.122. The provision of a centrally located, and Mill Lane facing cycle store, with direct access to the road network is positive. This would provide sufficient cycle spaces for future

residents. Transport have requested additional details, as to retain an objection, an update report will be provided which details a final transport response.

ix) Other Matters

Ecology

- 7.123. From an ecology perspective, as per the summarised GS Ecology comments at paragraphs 5.20 above, there are no objections to the scheme, subject to conditions securing details of the various biodiversity enhancements, wildlife friendly lighting scheme, and biodiversity enhancements scheme to include 15 bird boxes, 15 bat boxes, and wildlife friendly landscaping. These conditions would ensure compliance with Policy EN12.
- 7.124. With regard to Biodiversity Net Gain (BNG) the proposal would be subject to the mandatory net gain of 10%. This would automatically apply to the permission if granted. The information submitted demonstrates a significant net gain on-site, aided by the landscaping proposals, and brown roof proposed. Though this level of gain would be expected given the very low baseline.

Sustainable Drainage Systems (SuDS)

- 7.125. The LLFA comments, summarised at paragraph 5.5**Error! Reference source not found.** above, the principle of the drainage strategy is established resulting in a reduced runoff rates. The full details of the strategy are yet to be sufficiently demonstrated. This objection would serve as a halt to development, and it is expected that this be sufficiently addressed by the Applicant, and satisfied within an Update Report.

Archaeology

- 7.126. As per comments summarised at paragraph 16 above, Berkshire Archaeology consider it necessary for a condition to secure a desk-based assessment, and a scheme of archaeological work (including implementation thereof). This will further assess the potential for survival of remains at the site and in-turn mitigate any harm resulting from the development.

Crime and Safety

- 7.127. In terms of crime and anti-social behaviour matters, the DOCO at Thames Valley Police raised a number of concerns in relation to the originally submitted scheme. The applicant sought to address the matters raised when revising the scheme, and the DOCO responded with similar, though lessened concerns (see 5.7). The remaining comments did not raise insurmountable issues with the proposals. It is considered reasonable and necessary to secure details of a robust security strategy in full via condition (at which point DOCO input will be sought), for the benefit of existing/future occupiers of the area, as well as future occupiers of the proposed development.

Wind and microclimate

- 7.128. With regard to wind/microclimate matters, Arc Aero's assessment on behalf of officers (as summarised at paragraphs 5.29 - 5.29 above), concludes that the proposed development will not cause harmful wind impacts in the vicinity of the site for nearby occupiers or users of the area and no specific wind conditions or mitigations are considered to be necessary, with the development producing a suitably pleasant urban environment and comply with Policy CR13

8. Equality implications

- 8.1. Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, have due regard to the need to—
 - eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8.2. The key equalities protected characteristics include age, disability, sex, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation. It is considered that there is no indication or evidence that the protected groups have or will have different needs, experiences, issues and priorities in relation to this particular application

9. Conclusion & planning balance

9.1. As with all applications considered by the Local Planning Authority, the application is required to be determined in accordance with the Development Plan unless material considerations indicate otherwise, as per Section 38(6) of the Planning and Compulsory Purchase Act 2004.

9.2. The application site lies between a number of features that represent constraints to the development. To the north is the IDR and its generally harsh environment in terms of outlook, noise and air quality. The need to conserve and enhance the setting of the conservation area to the south and east also presents challenges to designing an appropriate scheme.

9.3. The proposed development would redevelop an underutilised site within a highly accessible location, this is a clear benefit of the scheme and officers afford this significant weight. The inclusion of a meaningful amount of affordable housing on site (plus a DPM) is also considered to be a significant benefit of the scheme with the 10% LHA provision and 6% DMR (80% of open market rent). The additional matters to be covered within the s106 agreement, including contributions to healthcare and open space improvements) are also benefits of the scheme that are necessary to make the development acceptable, and are directly related to the development. Furthermore, the provision of a car-free development is a welcome component of the proposal, the provision of suitable cycle parking, and a car club space with membership guarantees will be highly beneficial to future residents.

9.4. A communal residential garden that has private access for residents will also provide a good level of amenity in this very urban location. It will be shielded from the IDR by the built form, which would aid in reducing noise and air quality impacts. Not all sites within the town centre and surrounds would have space on site for such a facility and is considered a welcome addition.

9.5. The accommodation contains an overprovision of one-bed flats compared to policy which results in harm in terms of choice for potential residents. Additionally, the applicant's reliance for a building shape in an elongated capital 'E' has both advantages and disadvantages. Flats facing sideways have suitable outlooks as do corner flats, and outlooks and light levels become progressively more suitable with increased height. However, there are narrow flats on each floor (8 per floor, 1-5; and 12 on floors 6-7), being only 4m wide and 15m in depth would have less attractive living environments and these make up a significant proportion of the total. The occurrence of north-facing (single aspect) flats (22 no.) would be a minority. The daylight/sunlight which would be provided to a number of flats would not meet BRE guidelines. This is disappointing within the context of a site which is not overshadowed by surrounding buildings. Adverse impacts upon neighbouring residential-type properties are often to be expected when introducing large development proposals in urban contexts. In this instance, the proposal causes overshadowing effects, largely due to its height and bulk, and this would be most felt in ten, single-aspect, north-facing studio flats within the nearby Saxon Court development, with them experiencing a moderate loss of daylight.

- 9.6. The Applicant has been unable to confirm details of materials at this time. Accordingly, appropriate careful conditions are recommended to ensure officers would have control over the specifics of the materials and their quality and application.
- 9.7. The Recommendation box advises that three matters are outstanding at this time. The progress and satisfactory conclusion to these matters will be factors in the planning balance and commentary will be provided in update report.
- 9.8. When considering the application, officers consider the balance to be delicate. The harm identified, particularly in relation to scale, heritage impact, and affordable housing shortfall, is acknowledged and given due weight. The quality of the accommodation and effects on surrounding properties are overall considered to be neutral in the planning balance. The benefits of the scheme, including housing delivery, proposed architectural quality, and development of an underused site are substantial. In this finely balanced case, it is recommended that planning permission be granted, subject to the completion of a s106 agreement and the conditions outlined in the report.

Case Officer: Anthony Scholes

Appendix A – Plans and Documents Submitted

24/08/2024

- Completed planning application form;
- Completed CIL Additional Information form;

Application drawings, prepared by Carey Jones Chapman Tolcher (CJCT): Site Location Plan (ref. 08278-CJA-ZZ-ZZ-DR-A-0150);

Existing Site Plan (ref. 08278-CJA-ZZ-ZZ-DR-A-0120);

Existing Site Topography (ref. 08278-CJA-ZZ-ZZ-DR-A-0130);

Existing Ground Floor Plan (ref. 08278-CJA-ZZ-00-DR-A-0121);

Existing Mezzanine Floor Plan (ref. 08278-CJA-ZZ-01-DR-A-0122);

Existing Elevations (ref. 08278-CJA-ZZ-ZZ-DR-A-0170);

Proposed Site Plan (ref. 08278-CJA-ZZ-ZZ-DR-A-0100);

Proposed Site Topography (ref. 08278-CJA-ZZ-ZZ-DR-A-0110);

Proposed Ground Floor Plan (ref. 08278-CJA-ZZ-00-DR-A-0200);

Proposed 1st Floor Plan (ref. 08278-CJA-ZZ-01-DR-A-0201);

Proposed 2nd Floor Plan (ref. 08278-CJA-ZZ-02-DR-A-0202);

Proposed 3rd Floor Plan (ref. 08278-CJA-ZZ-03-DR-A-0203);

Proposed 4th Floor Plan (ref. 08278-CJA-ZZ-04-DR-A-0204);

Proposed 5th Floor Plan (ref. 08278-CJA-ZZ-05-DR-A-0205);

Proposed 6th Floor Plan (ref. 08278-CJA-ZZ-06-DR-A-0206);

Proposed 7th Floor Plan (ref. 08278-CJA-ZZ-07-DR-A-0207);

Proposed 8th Floor Plan (ref. 08278-CJA-ZZ-08-DR-A-0208);

Proposed 9th Floor Plan (ref. 08278-CJA-ZZ-09-DR-A-0209);

Proposed 10th Floor Plan (ref. 08278-CJA-ZZ-10-DR-A-0210);

Proposed Roof Plan (ref. 08278-CJA-ZZ-RF-DR-A-0211);

Proposed North Elevation (ref. 08278-CJA-ZZ-XX-DR-A-0700);

Proposed South Elevation (ref. 08278-CJA-ZZ-XX-DR-A-0701);

Proposed East Elevation (ref. 08278-CJA-ZZ-XX-DR-A-0702);

Proposed West Elevation (ref. 08278-CJA-ZZ-XX-DR-A-0703);

Proposed Section AA (ref. 08278-CJA-ZZ-XX-DR-A-0600);

Proposed Section BB (ref. 08278-CJA-ZZ-XX-DR-A-0601);

Proposed Section CC (ref. 08278-CJA-ZZ-XX-DR-A-0602);

Proposed Section DD (ref. 08278-CJA-ZZ-XX-DR-A-0603);

Typical Core B Parapet Condition (ref. 08278-CJA-ZZ-ZZ-DR-A-0500);

Typical Core A Parapet Condition (ref. 08278-CJA-ZZ-ZZ-DR-A-0501);

Typical Core B Rear Parapet Condition (ref. 08278-CJA-ZZ-ZZ-DR-A-0502);

Typical Core C Parapet Condition (ref. 08278-CJA-ZZ-ZZ-DR-A-0503);

Typical Access Deck Condition (ref. 08278-CJA-ZZ-ZZ-DR-A-0504);

- Schedule of Residential Net & Gross Floor Areas, prepared by CJCT;
- Arboricultural Impact Assessment (including Tree Constraints Plan, Tree Survey and Tree Protection Plan), prepared by AECOM;
- Archaeological Desk-Based Assessment, prepared by RPS;
- Air Quality Assessment, prepared by Hoare Lea;
- Air Quality Mitigation Plan, prepared by Hoare Lea;
- Biodiversity Net Gain Assessment, prepared by AECOM;
- Construction Management Plan, prepared by Graham Construction;
- Daylight and Sunlight Assessment: Internal Daylight, Sunlight and Overshadowing Report, prepared by GIA;
- Daylight and Sunlight Assessment: Impact on Neighbouring Properties Report, prepared by GIA;
- Design and Access Statement, prepared by CJCT;
- Economic Benefits Assessment, prepared by Savills;
- Energy Statement, prepared by Hoare Lea;
- External Lighting Assessment (including External Lighting Design), prepared by Hoare Lea;
- Fire Statement: Gateway One, prepared by Hoare Lea;
- Fire Statement: Qualitative Design Review, prepared by Hoare Lea;

- Flood Risk Assessment and Drainage Strategy, prepared by Fairhurst;
- Framework Residential Travel Plan, prepared by Glanville;
- Heritage, Townscape and Visual Impact Assessment, prepared by Montagu Evans;
- Landscape drawings, prepared by Camlins: General Arrangement – Existing Condition Plan (ref. SY743-000-0000);
- General Arrangement – Public Realm and Landscape (ref. SY743-000-0001);
- General Arrangement – Overall Landscape (ref. SY743-000-0002);
- General Arrangement – Landscape Levels (ref. SY743-000-0011);
- General Arrangement – Areas of Hard Surfaces (ref. SY743-000-0021);
- General Arrangement – Boundary Treatments, Edges, Steps and Walls (ref. SY743-000-0031);
- General Arrangement – Growing Medium Formation (ref. SY743-000-0041);
- General Arrangement – Tree Planting Plan (ref. SY743-000-0051);
- General Arrangement – Planting Strategy (ref. SY743-000-0061);
- General Arrangement – Furniture and Fixtures (ref. SY743-000-0071);
- Landscape Strategy, prepared by Camlins;
- Landscape and Ecology Management Plan, prepared by AECOM;
- Noise Impact Assessment, prepared by Hoare Lea;
- Operational Waste Management Strategy, prepared by SLR;
- Phase I and II Environmental Site Assessment, prepared by Ramboll;
- Planning Statement, prepared by Savills;
- Preliminary Ecological Assessment, prepared by AECOM;
- Social Value Strategy, prepared by Savills;
- Statement of Community Involvement, prepared by Cratus;
- Sustainability Statement, prepared by Hoare Lea;
- Transport Assessment, prepared by Glanville;
- Utilities Assessment, prepared by Hoare Lea;
- Viability Assessment, prepared by DS2; and
- Wind and Microclimate Assessment, prepared by AECOM.

25/07/2025

Updated CIL Additional Information form (replacing previous version submitted 30/08/24);

- Updated Application drawings, with accompanying Drawing Issue Sheet, prepared by Carey Jones Chapman Tolcher (CJCT) (replacing all proposed application drawings previously submitted 30/08/24); Proposed Site Plan (ref. 08278-CJA-ZZ-ZZ-DR-A-0100 Rev. C.02); Proposed Site Topography (ref. 08278-CJA-ZZ-ZZ-DR-A-0110 Rev. C.02); Proposed Ground Floor Plan (ref. 08278-CJA-ZZ-00-DR-A-0200 Rev. C.02); Proposed 1st Floor Plan (ref. 08278-CJA-ZZ-01-DR-A-0201 Rev. C.02); Proposed 2nd Floor Plan (ref. 08278-CJA-ZZ-02-DR-A-0202 Rev. C.02); Proposed 3rd Floor Plan (ref. 08278-CJA-ZZ-03-DR-A-0203 Rev. C.02); Proposed 4th Floor Plan (ref. 08278-CJA-ZZ-04-DR-A-0204 Rev. C.02); Proposed 5th Floor Plan (ref. 08278-CJA-ZZ-05-DR-A-0205 Rev. C.02); Proposed 6th Floor Plan (ref. 08278-CJA-ZZ-06-DR-A-0206 Rev. C.02); Proposed 7th Floor Plan (ref. 08278-CJA-ZZ-07-DR-A-0207 Rev. C.02); Proposed Roof Plan (ref. 08278-CJA-ZZ-RF-DR-A-0211 Rev. C.02); Proposed North Elevation (ref. 08278-CJA-ZZ-XX-DR-A-0700 Rev. C.02); Proposed South Elevation (ref. 08278-CJA-ZZ-XX-DR-A-0701 Rev. C.02); Proposed East Elevation (ref. 08278-CJA-ZZ-XX-DR-A-0702 Rev. C.02); Proposed West Elevation (ref. 08278-CJA-ZZ-XX-DR-A-0703 Rev. C.02); Proposed Section AA (ref. 08278-CJA-ZZ-XX-DR-A-0600 Rev. C.02); Proposed Section BB (ref. 08278-CJA-ZZ-XX-DR-A-0601 Rev. C.02); Proposed Section CC (ref. 08278-CJA-ZZ-XX-DR-A-0602 Rev. C.02); Proposed Section DD (ref. 08278-CJA-ZZ-XX-DR-A-0603 Rev. C.02); Typical Core B Parapet Condition (ref. 08278-CJA-ZZ-ZZ-DR-A-0500 Rev. C.02); Typical Core A Parapet Condition (ref. 08278-CJA-ZZ-ZZ-DR-A-0501 Rev. C.02); Typical Core B Rear Parapet Condition (ref. 08278-CJA-ZZ-ZZ-DR-A-0502 Rev. C.02); Typical Core C Parapet Condition (ref. 08278-CJA-ZZ-ZZ-DR-A-0503 Rev. C.02); Typical Access Deck Condition (ref. 08278-CJA-ZZ-ZZ-DR-A-0504 Rev. C.02);

- Updated Schedule of Residential Net & Gross Floor Areas, prepared by CJCT (replacing previous version submitted 30/08/24);
- Updated Biodiversity Net Gain Assessment, prepared by AECOM (replacing previous version submitted 30/08/24);
- Updated Daylight and Sunlight Assessment: Internal Daylight, Sunlight and Overshadowing Report, prepared by GIA (replacing previous version submitted 30/08/24);
- Updated Daylight and Sunlight Assessment : Impact on Neighbouring Properties Report, prepared by GIA (replacing previous version submitted 30/08/24);
- Design and Access Statement Addendum, prepared by CJCT (accompanying submitted Design and Access Statement);
- Updated Energy Statement, prepared by Hoare Lea (replacing previous version submitted 30/08/24);
- Updated Fire Statement: Gateway One, prepared by Hoare Lea (replacing previous version submitted 30/08/24);
- Updated Flood Risk Assessment and Drainage Strategy, prepared by Fairhurst (replacing previous version submitted 30/08/24);
- Updated Heritage, Townscape and Visual Impact Assessment, prepared by Montagu Evans (replacing previous version submitted 30/08/24);

Updated Landscaping drawings, prepared by Camlins (replacing all proposed landscaping drawings previously submitted 30/08/24); General Arrangement – Public Realm and Landscape (ref. SY743-275-0001 Rev. P01);

General Arrangement – Overall Landscape (ref. SY743-275-0002 Rev. P01);
 General Arrangement – Landscape Levels (ref. SY743-275-0011 Rev. P01);
 General Arrangement – Areas of Hard Surfaces (ref. SY743-275-0021 Rev. P01);
 General Arrangement – Boundary Treatments, Edges, Steps and Walls (ref. SY743-275-0031 Rev. P01);
 General Arrangement – Ecological Enhancements (ref: SY743-275-0091 Rev. P01);
 General Arrangement – Growing Medium Formation (ref. SY743-275-0041 Rev. P01);
 General Arrangement – Tree Planting Plan (ref. SY743-275-0051 Rev. P01);
 General Arrangement – Planting Strategy (ref. SY743-275-0061 Rev. P01);
 General Arrangement – Furniture and Fixtures (ref. SY743-275-0071 Rev. P01);

Updated Landscape Strategy, prepared by Camlins (replacing previous version submitted 30/08/24);
 Updated Landscape and Ecology Management Plan, prepared by AECOM (replacing previous version submitted 30/08/24);
 Updated Operational Waste Management Strategy, prepared by SLR (replacing previous version submitted 30/08/24);
 Planning Statement Addendum, prepared by Savills;
 Updated Sustainability Statement, prepared by Hoare Lea (replacing previous version submitted 30/08/24);
 Transport Assessment Addendum, prepared by Glanville (accompanying submitted Transport Assessment);
 Viability Assessment Addendum, prepared by DS2 (accompanying submitted Viability Assessment); and
 Updated Wind and Microclimate Assessment, prepared by RWDI (replacing previous version submitted 30/08/24).

12/09/2025

Daylight and Sunlight Statement of Conformity (September 2025), prepared by GIA
 Design and Access Statement Addendum 02 (September 2025), prepared by CJCT
 Energy Statement of Conformity (September 2025), prepared by Hoare Lea
 Heritage, Townscape and Visual Impact Statement of Conformity (September 2025), prepared by Montagu Evans
 Landscaping drawings, prepared by Camlins (superseding previous versions):

- General Arrangement – Public Realm and Landscape (ref. SY743-275-0001 Rev. P03)
- General Arrangement – Overall Landscape (ref. SY743-275-0002 Rev. P02)
- General Arrangement – Landscape Levels (ref. SY743-275-0011 Rev. P03)
- General Arrangement – Areas of Hard Surfaces (ref. SY743-275-0021 Rev. P02)

- General Arrangement – Ecological Enhancements (ref: SY743-275-0091 Rev. P02)
- General Arrangement – Growing Medium Formation (ref. SY743-275-0041 Rev. P02)
- General Arrangement – Tree Planting Plan (ref. SY743-275-0051 Rev. P02)
- General Arrangement – Planting Strategy (ref. SY743-275-0061 Rev. P02)
- General Arrangement – Furniture and Fixtures (ref. SY743-275-0071 Rev. P02)

Landscape Design Addendum (September 2025), prepared by Camlins

Transport Assessment Addendum (September 2025), prepared by Glanville, including updated Highways drawings (superseding previous versions):

- Crossland Road General Arrangement (ref. 8230634/6103 Rev. L)
- Crossland Road Land Dedication and Stopping-Up Plan (ref. 8230634/6104 Rev. E)
- Crossland Road Proposed Arrangement (ref. 8230634/6105 Rev. D)
- Letcombe Street Swept Path Analysis 8.75m Refuse Vehicle (ref. 8230634/6203 Rev. H)
- Crossland Road Turning Head 8.0m Box Van & Home Delivery Vehicle Swept Paths (ref. 8230634/6206 Rev. E)
- Crossland Road Turning Head Refuse Lorry Swept Paths - Sheet 1 (ref. 8230634/6207 Rev. E)
- Crossland Road Turning Head Refuse Lorry Swept Paths - Sheet 2 (ref. 8230634/6208 Rev. E)
- Crossland Road Turning Head Fire Tender Swept Paths - Sheet 1 (ref. 8230634/6209 Rev. E)
- Crossland Road Turning Head Fire Tender Swept Paths - Sheet 2 (ref. 8230634/6210 Rev. E)
- Crossland Road Turning Head 10m Rigid Lorry Swept Paths (ref. 8230634/6211 Rev. D)

Viability Assessment Addendum (September 2025), prepared by DS2

Appendix 2- Plans and Documents



Figure 28 - Ground Floor Plan - Affordable Housing Location



Figure 29 - First Floor Plan - Affordable Housing Location



Figure 30 - Second Floor Plan - Affordable Housing Location



Figure 31 - Third Floor Plan - Affordable Housing Location



Figure 32 - Fourth Floor Plan - Affordable Housing Location



Figure 33 - Fifth Floor Plan - Affordable Housing Location







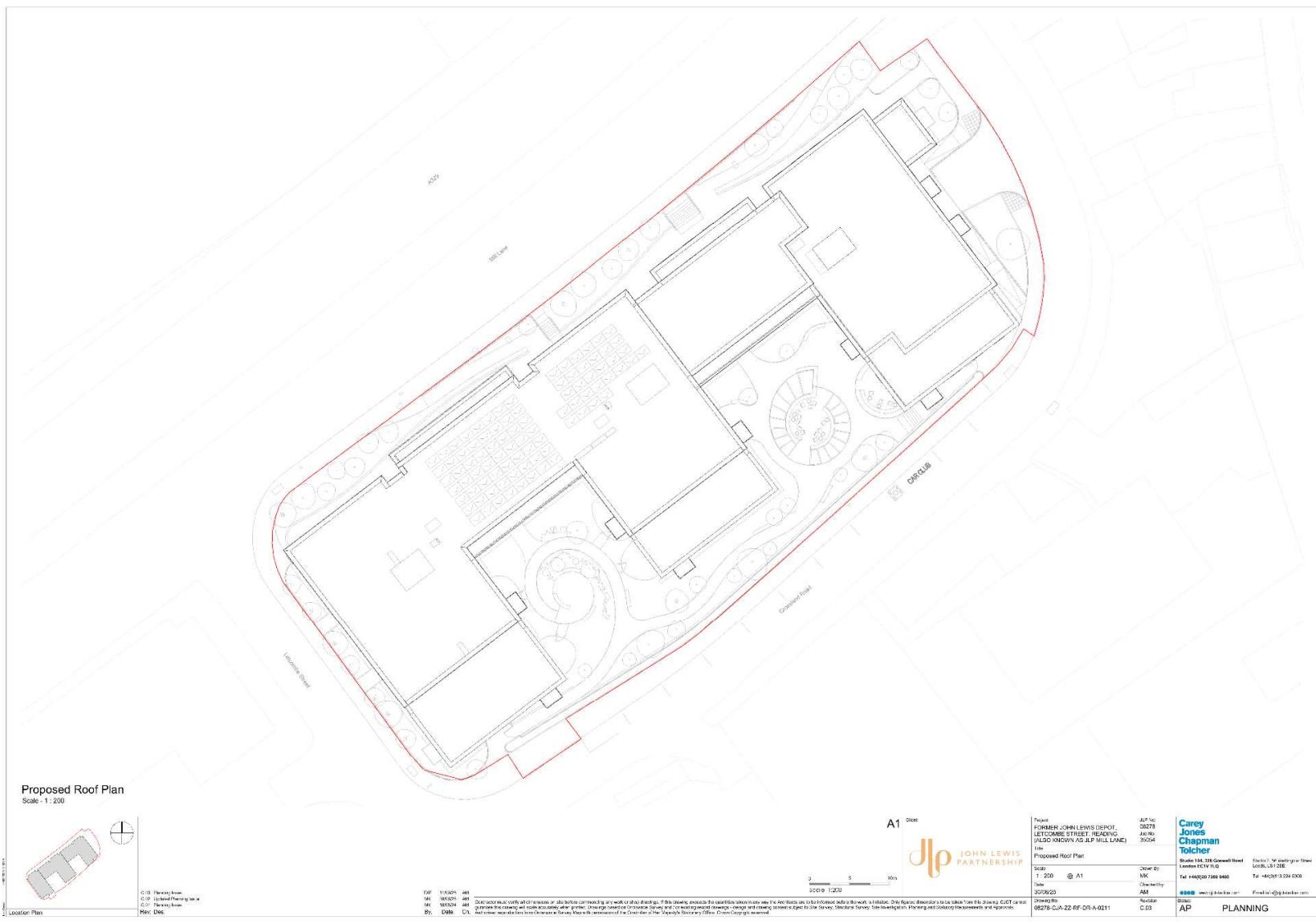


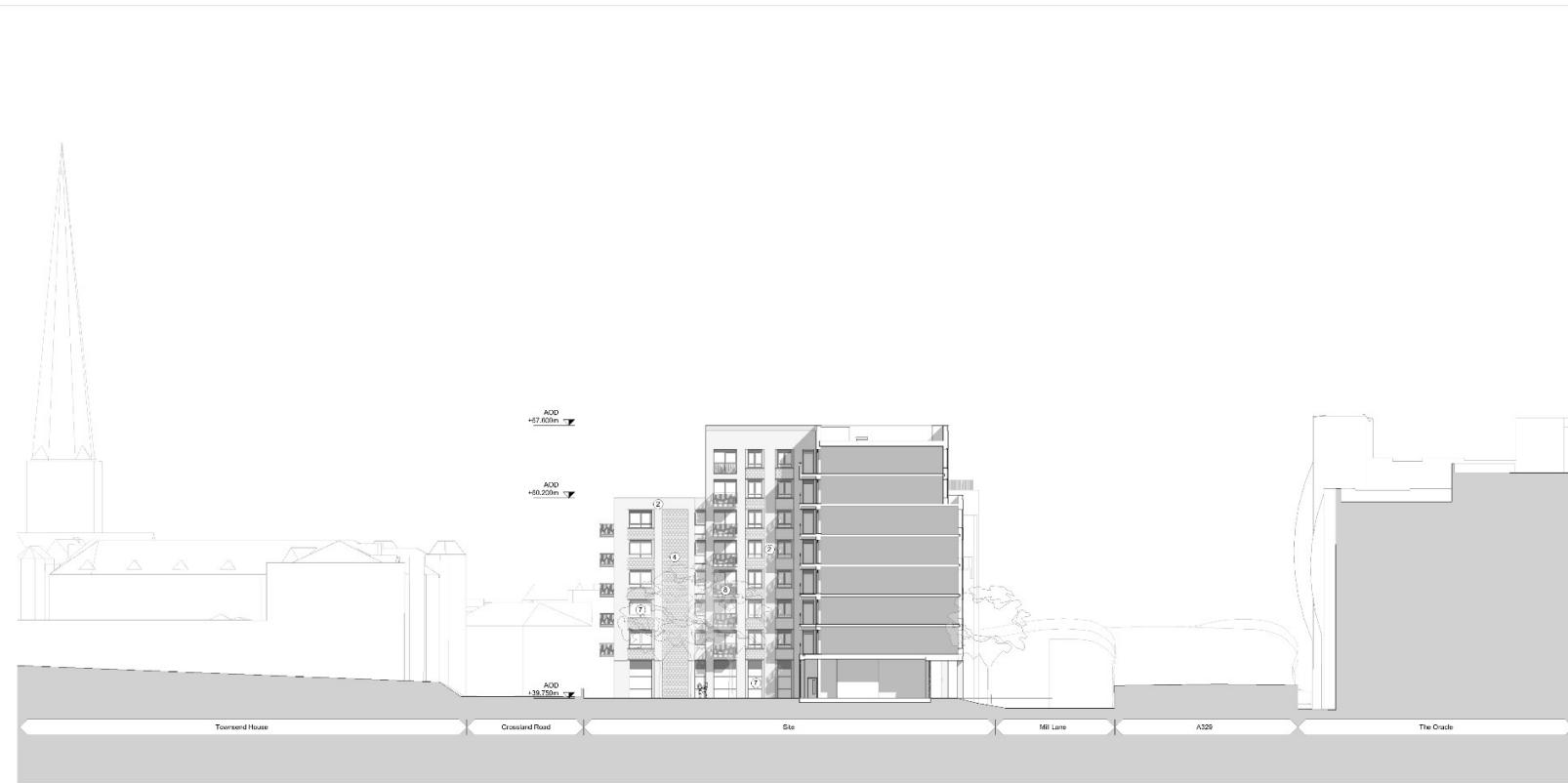






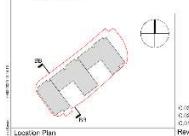






Proposed Section BB

Proposed



Rev

- 1. Brick Type 1: Light Red Brick
- 2. Brick Type 2: Mid Red Brick
- 3. Brick Type 3: Red Brick
- 4. Bricks Type 4: Grey Brick
- 5. Bricks Type 5: White Brick
- 6. PPC Aluminum Cladding: Rosea
- 7. PPC Aluminum WindowDoorCabinet: Welt Bronze
- 8. Metal Bricks

A1 ³

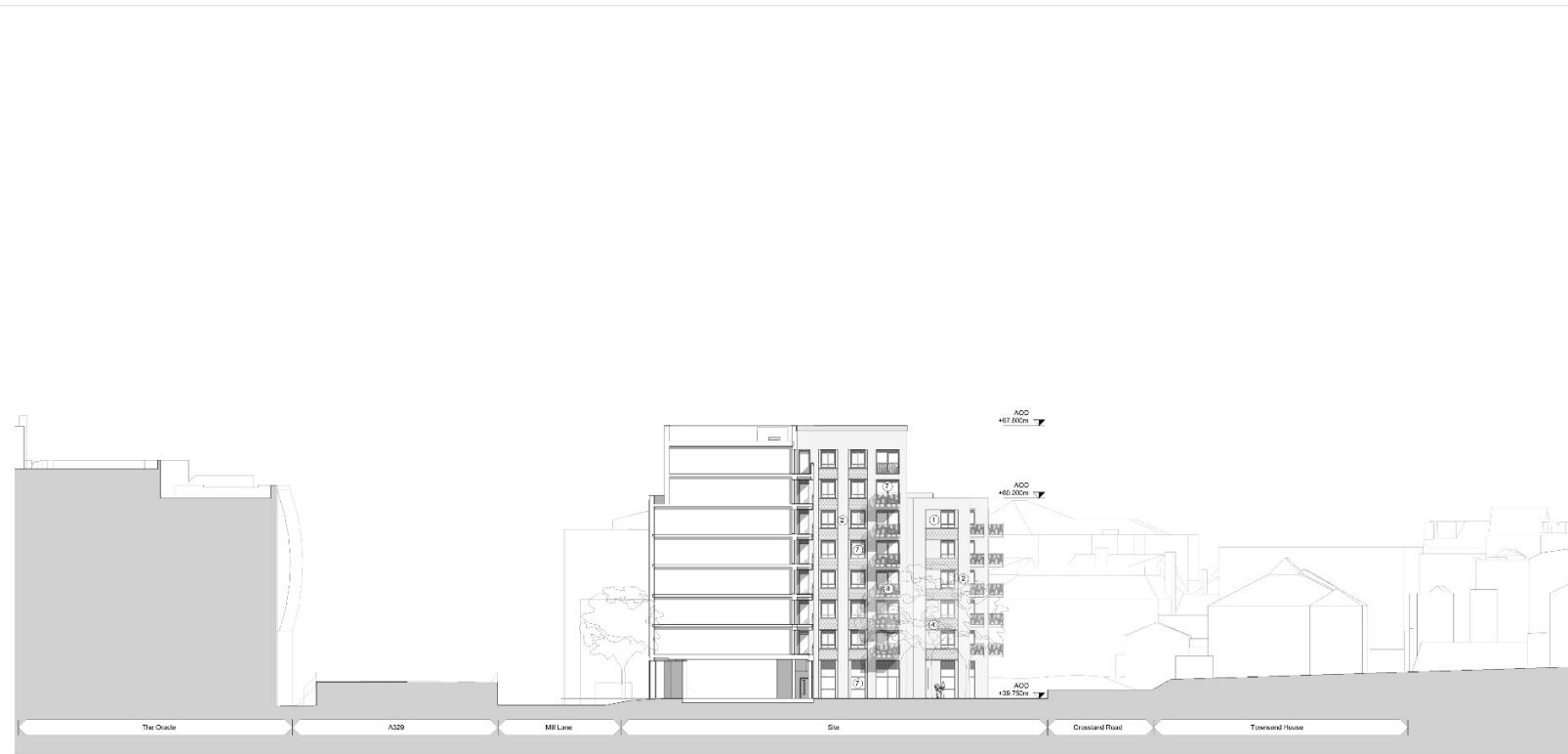
JOHN LEWIS
PARTNERSHIP

Project:
FORMER JOHN LEWIS DEPOT,
LETCOMBE STREET, READING
(ALSO KNOWN AS JLP MILL LANE)

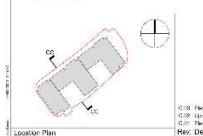
JLP No:
06278
JLR No:
36068

Well Road Studio 2, St. John's Street
Leeds, LS1 2EE
Tel: 0442 313 234 0000

PLANNING



Proposed Section CC
Scale 1: 200



Material Key

- 1. Brick Type 1 Light Red Brick
- 2. Brick Type 2 Red Brick
- 3. Brick Type 3 Red Brick
- 4. Brick Type 4 Red Brick
- 5. Brick Type 5 White Brick
- 6. Pavers - Grey Pavers
- 7. Pavers - Yellow Pavers
- 8. Metal Frame

Location Plan

CS (Fluorescent tube
C2 (Fluorescent tube
C3 (Fluorescent tube
Rev. Date



Ref: 20271
Former John Lewis Depot,
Letcombe Street, Reading
(Also known as JLP Mill Lane)

Job No:
35024

Proposed Section CC
SCD 1: 200 @ A1
Date: 30/06/20
Drawn by: 1
Checked by: 1
Drawing No: 00000-0000-0000-0000
Revised by: 00000-0000-0000-0000
Approved by: 00000-0000-0000-0000
Date: 00/00/00
Filing Ref: 00000-0000-0000-0000

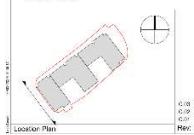
Carey
James
Tolcher

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james@jltolcher.com
tolcher@jltolcher.com

AP
PLANNING



Proposed West Elevation
Scale - 1:200



Material Key

1. Brick Type 1 Light Red Brick
2. Brick Type 2 Red Brick
3. Brick Type 3 Red Brick
4. Brick Type 4 Red Brick
5. Brick Type 5 White Brick
6. PEBBLES - Natural Buff
7. PVCu Windows White/Black/Brass
8. Metal Frame

Location Plan
Rev. Date



A1

Scale 1:200

0m

5m

10m

1000 500 0m

500m

1000m

1500m

2000m

2500m

3000m

3500m

4000m

4500m

5000m

5500m

6000m

6500m

7000m

7500m

8000m

8500m

9000m

9500m

10000m

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21500m

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31500m

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41500m

42000m

42500m

43000m

43500m

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68500m

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70500m

71000m

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72000m

72500m

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73500m

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76500m

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79000m

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80000m

80500m

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81500m

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82500m

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83500m

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84500m

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85500m

86000m

86500m

87000m

87500m

88000m

88500m

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90500m

91000m

91500m

92000m

92500m

93000m

93500m

94000m

94500m

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95500m

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96500m

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97500m

98000m

98500m

99000m

99500m

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103000m

103500m

104000m

104500m

105000m

105500m

106000m

106500m

107000m

107500m

108000m

108500m

109000m

109500m

110000m

110500m

111000m

111500m

112000m

112500m

113000m

113500m

114000m

114500m

115000m

115500m

116000m

116500m

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117500m

118000m

118500m

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119500m

120000m

120500m

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125000m

125500m

126000m

126500m

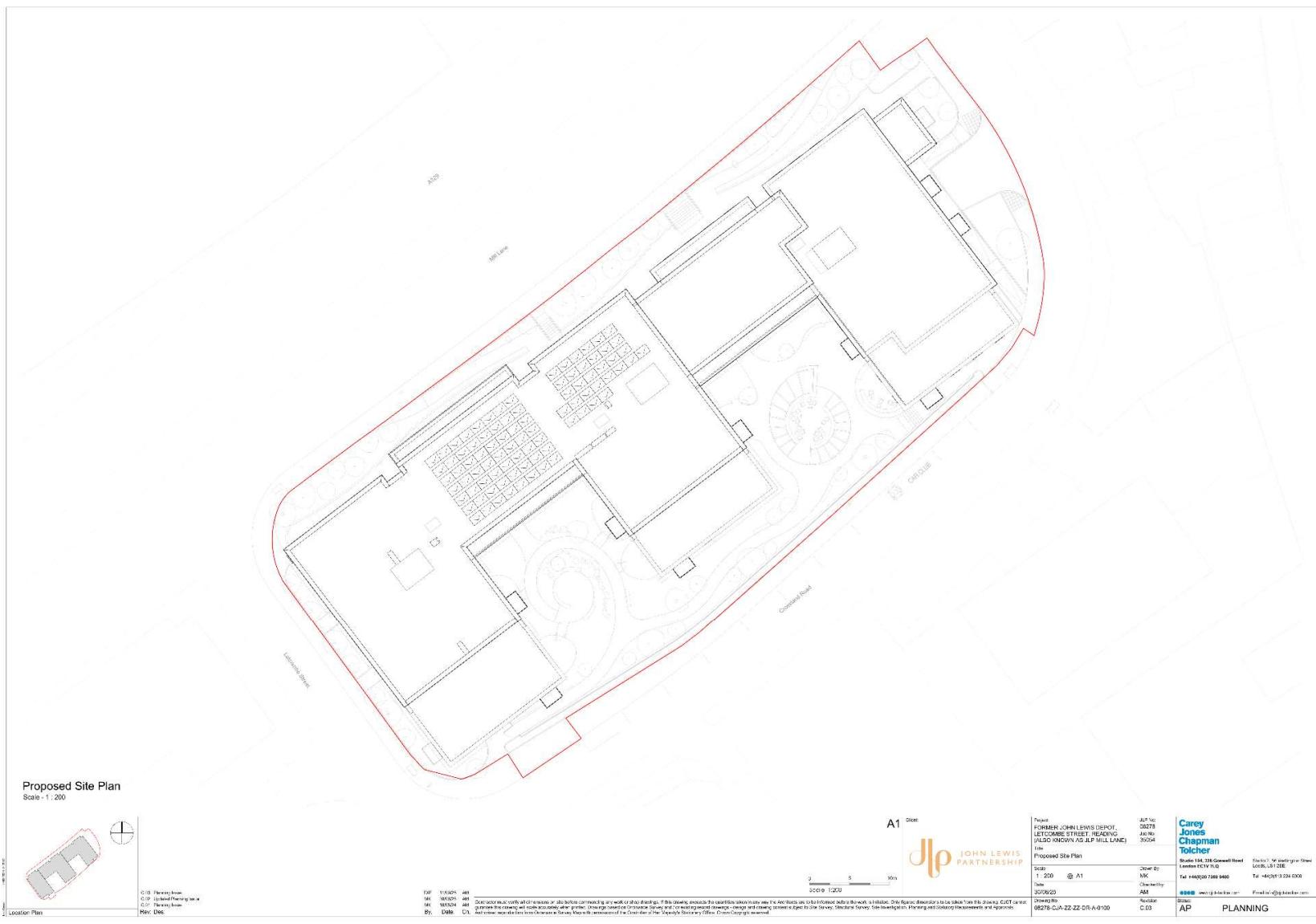
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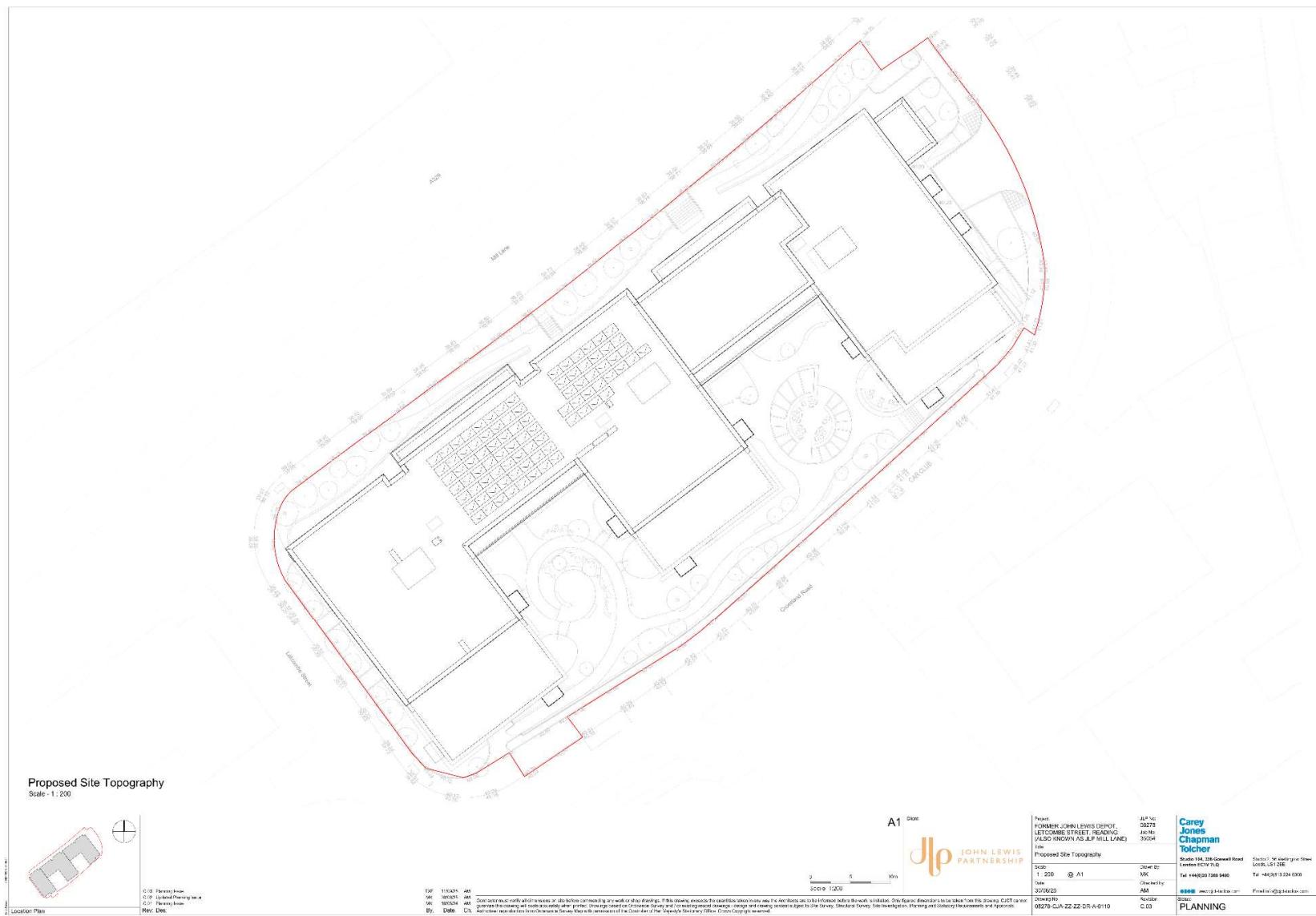
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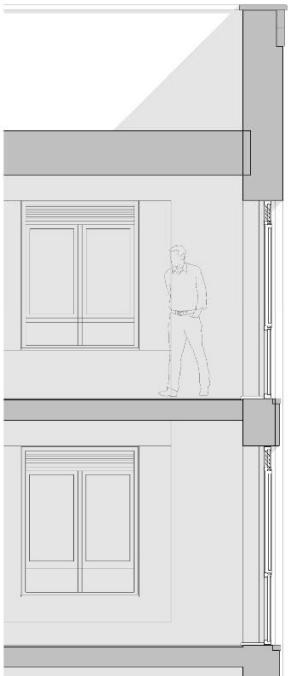
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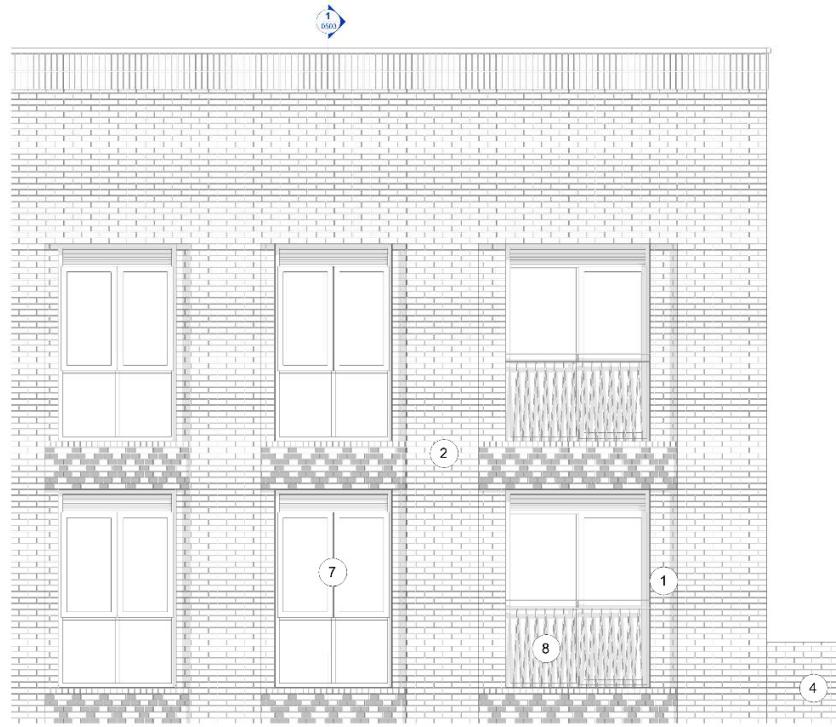
129000m







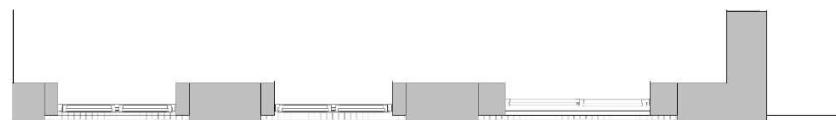
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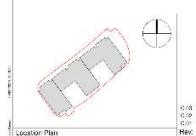
2 Bay Study - Typical Parapet 4
Scale - 1:25



4 West Elevation
Scale - 1:1000



3 Plan - Level 6
Scale - 1:25



Location Plan
C18 Upstand Thinning see
C20 Upstand Thinning see
C27 Flanking see
Rev. Des.

Material Key

1. Brick Type 1 Light Grey Brick
2. Brick Type 2 Light Grey Brick
3. Brick Type 3 Red Brick
4. Brick Type 4 Grey Brick
5. Brick Type 5 White Brick
6. Pavers - Grey Pavers
7. Iron Hammered Zinc/Brass/Steel Wall Braces
8. Metal Frame

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A1 Site

Former JOHN LEWIS DEPOT,
LETSCOMB STREET, READING
(ALSO KNOWN AS JLP MILL LANE)

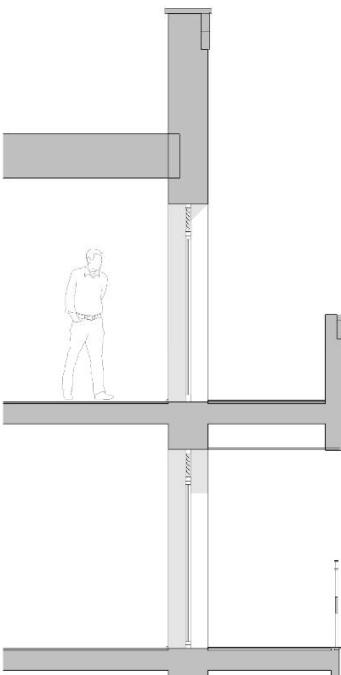
Plot No. 30273
Ref No. 35024

Typical Core C Parapet Condition

Drawn by: Carey
Drawn on: 10/03/2020
Drawn at: 1:250
Drawn on: 10/03/2020
Drawn at: 1:250
Drawn by: Chapman
Drawn on: 10/03/2020
Drawn at: 1:250
Drawn by: Tolcher
Drawn on: 10/03/2020
Drawn at: 1:250

John Lewis Partnership
Studio 104, 30 General Road
London E17 7LD
Tel: +44(0)20 7880 0400
Fax: +44(0)1324 6006
Email: info@jlptolcher.com

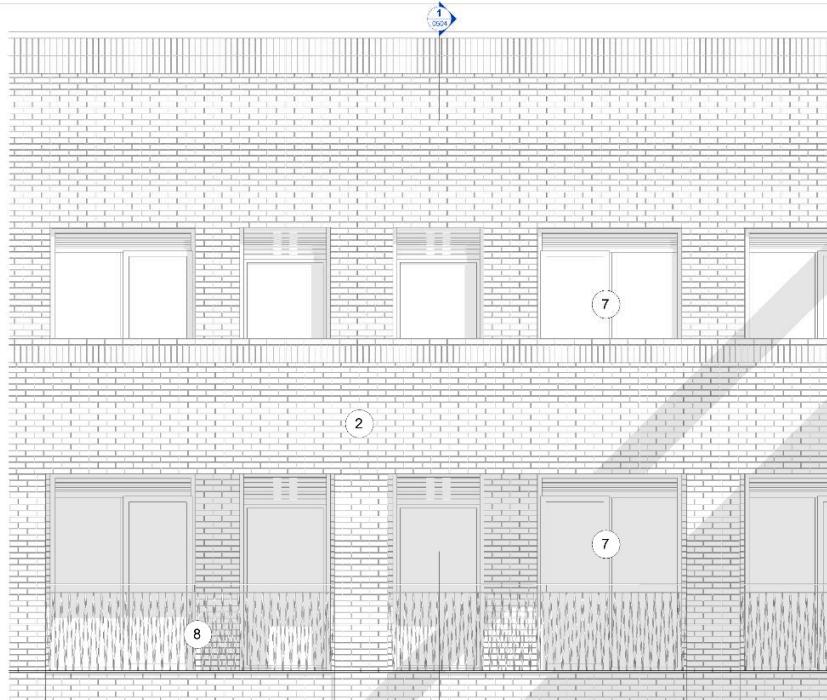
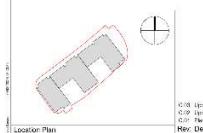
Planning
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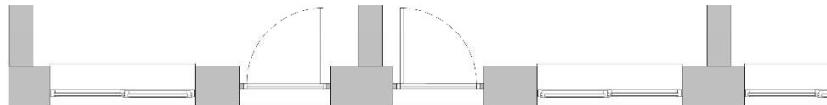
1 Section (Typical Access Balcony)



4 South Elevation



2 Bay Study - Typical Access Deck



3 Level 7 Plan
Scale - 1: 25

Material Key

1. Brick Type 1: Light Red Brick
2. Brick Type 2: Mid Red Brick
3. Brick Type 3: Red Brick
4. Brick Type 4: Grey Brick
5. Rock Type 5: White Rock
6. PPC Aluminous Cladding: Rosea
7. PVC Aluminous Window/Door/Carver Welt: Iron
8. Metal Bricks

A1 Client
 JOHN LEWIS
 PARTNERS

Project:
FORMER JOHN LEWIS DEPOT,
LETcombe STREET, READING
(ALSO KNOWN AS JL P. MILL LANE)

JEP No:
06278
JEP No:
36076

Care
Jones
Cham

100

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