



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

PLANNING STATEMENT

AUGUST 2024

savills

# Planning Statement

Former John Lewis Depot, Letcombe Street, Reading (also known as JLP Mill Lane)

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## Executive Summary

- I. This Planning Statement has been prepared by Savills on behalf of John Lewis Partnership (JLP) BTR Ltd ('the Applicant') in support of a full planning application to Reading Borough Council (RBC) at the former John Lewis Depot, Letcombe Street, Reading ('the Site').
- II. The description of the proposed development is as follows:

*"Demolition of the existing building and redevelopment of the site comprising erection of a new building for up to 215 build to rent residential dwellings (Use Class C3) together with flexible commercial / community space (Use Class E/F1/F2), residents' facilities, landscaping, public realm, amenity space, cycle parking and disabled car parking."*
- III. JLP is the UK's largest employee-owned business, operating two of Britain's best-loved retail businesses – John Lewis and Waitrose. Founded over 100 years ago, the company has been built on a vision to ensure a better way of doing business by benefitting its Partners, customers, suppliers and the communities in which JLP operates. JLP is a principal source of employment for the local community in Reading.
- IV. As JLP's retail business has expanded over many years, it has grown a sizable property portfolio of shops, warehouses and previously developed land. By transforming some of its underutilised, brownfield sites, it has the opportunity to both upgrade some of its stores and provide much-needed homes, including as much affordable housing as is commercially viable, in the communities it serves.
- V. These BTR homes will be purpose-built for renters, developed and managed by the JLP, which means it's in JLP's interest to deliver high-quality buildings that are thoughtfully designed with long term maintainability and appearance at the forefront. Residents would rent directly from a trusted business, providing them with greater certainty around areas such as quality, service, community and security of tenure.
- VI. Many of JLP's stores and land holdings are close to transport links and amenities - and the Partnership believes it has a social responsibility to make as best use of these sites as possible to play a role in addressing the housing crisis facing London and the UK.
- VII. The Site at Letcombe Street, Reading comprises brownfield land in a sustainable location within close proximity of key local services and facilities within Reading town centre. The use of the existing building as a customer collection centre, became surplus in 2021 after the function transferred to the John Lewis store on Broad Street, Reading. An opportunity thereby exists to provide professionally managed, high quality, purpose-built homes to support increasing demand for those wishing to rent.
- VIII. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan, unless material considerations indicate otherwise. The Development Plan comprises the Reading Borough Local Plan (adopted November 2019). Relevant material considerations include the National Planning Policy Framework (NPPF) (December 2023) and the emerging Reading Borough Local Plan Partial Update (LPPU) (November 2023).

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- IX. The redevelopment and intensification of brownfield land to increase housing supply is explicitly encouraged in both national and local planning policy, including the NPPF (2023) and Reading Local Plan (2019). The recent LPPU Consultation on Scope and Content (Regulation 18) (November 2023) identified the Site as a potential allocation for 'around 200 build-to-rent dwellings' (ref. Cen 3).
- X. The proposed development seeks to deliver high-quality build-to-rent dwellings in line with national and local planning policy and the provisions within the draft LPPU (Regulation 18) (November 2023).
- XI. There are clear benefits of the proposal including:
- Redevelopment of an underdeveloped sustainable town centre site providing much-needed housing in Reading;
  - 215 thoughtfully designed, high quality, community integrated new rental homes for Reading;
  - Homes owned and managed by the John Lewis Partnership, with the care and quality synonymous with JLP, ensuring a high standard of living for residents;
  - All homes will be fitted out with high quality John Lewis furniture;
  - A mix of homes, including a high proportion of family homes;
  - Provision of a range of residents' facilities including flexible work from home spaces, gym / fitness studio and communal lounge and dining areas;
  - Tenure-blind affordable homes for local people, including key workers, pepper-potted throughout the development, built and fitted out to the same standards as the market rent homes and enjoying access to the same facilities, amenities and services;
  - Longer tenancies promoting a sustainable long-term community, enabling residents to put down roots;
  - 24/7 on-site management team, looking after residents and curating communities;
  - Provision of a flexible commercial / community space to support local businesses and groups;
  - Creation of a low carbon development with a target 4-star Home Quality Mark rating;
  - Improved links around the Site to enhance accessibility and safety for pedestrians and cyclists;
  - Supporting sustainable travel opportunities including through provision of cycle parking facilities and Car Club provision;

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- New public and private landscaped spaces with increased tree planting, accessible play areas and public realm improvements;
- Delivery of significant Biodiversity Net Gain in excess of 10% requirement, ensuring the introduction of ecological diversity and wildlife habitats;
- Support and assistance for the local community, groups and organisations in the form of a long term Social Value programme;
- Creation of up to 120 gross direct construction jobs per annum, with training and apprenticeship opportunities;
- Creation of around 75 net additional operation phase jobs for local residents;
- Up to £2m of new household spend generated per year, supporting local goods and services in the borough;
- Public sector revenues through additional Council Tax revenue, Business Rates, New Homes Bonus and Community Infrastructure Levy.

IX. As demonstrated by the planning application, there are no technical or environmental impacts that would significantly or demonstrably outweigh the substantial benefits of the proposal. As such, the development proposal clearly represents 'sustainable development' and in accordance with paragraph 11 of the NPPF 2023 and Section 38 (6) of the Planning and Compulsory Purchase Act 2004, it is therefore respectfully requested that the planning application is approved without delay.

## 1. Introduction

- 1.1. This Planning Statement has been prepared by Savills on behalf of John Lewis Partnership BTR Ltd (JLP) ('the Applicant') in support of a full planning application to Reading Borough Council ('RBC') at the former John Lewis Depot, Letcombe Street, Reading ('the Site').

- 1.2. The description of the proposed development is as follows:

*"Demolition of the existing building and redevelopment of the site comprising erection of a new building for up to 215 build to rent residential dwellings (Use Class C3) together with flexible commercial / community space (Use Class E/F1/F2), residents' facilities, landscaping, public realm, amenity space, cycle parking and disabled car parking."*

### Context

- 1.3. The Site currently accommodates a warehouse building with customer collection facilities, ancillary car park and servicing area. However, the use of the existing building became surplus to requirements as a customer collection centre in 2021, with its functions having been transferred to the John Lewis department store at Broad Street, Reading.
- 1.4. As JLP's retail business has expanded over many years, it has grown a sizable property portfolio of shops, warehouses and previously developed land. By transforming some of its 'brownfield' sites, it has the opportunity to provide much-needed homes, including as much affordable housing as is commercially viable, as well as wider benefits to the communities it serves. These BTR homes will be purpose-built for renters, developed and managed by the JLP, which means it's in JLP's interest to deliver high-quality buildings that are thoughtfully designed with the same commitment to high standards as it applies to its John Lewis and Waitrose shops. This will allow JLP to add value to the Site and local area and to create a secure long term income to reinvest in its business
- 1.5. The Site comprises brownfield land located within the designated Reading Central Area within close proximity to key local services and facilities within the town centre. The redevelopment and intensification of brownfield land in sustainable locations, such as the Site, is explicitly encouraged in both national and local planning policy, including the National Planning Policy Framework (NPPF) (2023) and Reading Local Plan (2019). The recently-published draft NPPF (July 2024) also further emphasises that the development of brownfield land should be regarded as acceptable in principle.
- 1.6. The Site is currently allocated in the adopted Reading Local Plan (2019) (Policy CR14g) for public car parking to facilitate an additional 1,600-2,000sqm retail provision at The Oracle Shopping Centre opposite. However, RBC have now undertaken a Local Plan Review (March 2023) and have acknowledged that the current Local Plan allocation (Policy CR14g) is not up-to-date and is no longer deliverable. The recent Local Plan Partial Update (LPPU): Consultation on Scope and Content (Regulation 18) (November 2023) identifies the Site as a potential allocation for 'around 200 build-to-rent dwellings' (ref. Cen 3).

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- 1.7. The proposed development seeks to deliver high-quality build-to-rent dwellings in line with the provisions of the draft LPPU (Regulation 18) (November 2023), as well as the adopted Local Plan (2019), local supplementary planning guidance and national planning guidance. The proposals have been developed with careful consideration to a range of matters, including but not limited to, heritage and townscape, daylight / sunlight, landscape, arboriculture, ecology, transport, noise and air quality.
- 1.8. The submitted proposals have evolved and been informed by positive pre-application discussions held with RBC (via a Planning Performance Agreement (dated August 2023)), review by Design South East (January 2024) and detailed engagement with the local community.

## Planning Application Submission

- 1.9. This Statement provides details of the proposed development based upon the accompanying application drawings and the findings of technical reports. It should be read in conjunction with the accompanying application material to provide a comprehensive understanding of the proposal and its associated benefits.
- 1.10. In addition to this Planning Statement, the following documentation is submitted with the planning application:
  - Application drawings, prepared by Carey Jones Chapman Tolcher (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/Sunlight Assessment, 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, prepared by Hoare Lea;
  - Fire Statement, 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;
  - Landscape Strategy, prepared by Camlins;
  - Landscape and Ecology Management Plan, prepared by AECOM;
  - Noise Assessment, prepared by Hoare Lea;
  - Operational Waste Management Strategy, prepared by SLR;
  - Phase I and II Environmental Site Assessment, prepared by Ramboll;
  - Preliminary Ecological Assessment, prepared by AECOM;

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- 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.

## Report Structure

1.11. The remainder of this Statement is set out as follows:

- Section 2 describes the Site and its surroundings;
- Section 3 summarises the proposed development;
- Section 4 summarises the pre-application advice received and the public engagement activities undertaken;
- Section 5 sets out the planning policy context;
- Section 6 assesses the proposed development within the context of the Development Plan and relevant material considerations, including consideration of the benefits of the proposed development;
- Section 7 sets out the anticipated planning obligations; and
- Section 8 concludes the case for granting planning permission.

## 2. Site Context

### Site Location and Surrounding Context

- 2.1. The Site is located on the edge of Reading town centre within the administrative boundary of Reading Borough Council (RBC).
- 2.2. The Site is bound by Mill Lane and the A329 (Inner Distributor Road (IDR)) which run parallel to the north of the Site. Mill Lane extends from the Bridge Street / A327 Southampton Street roundabout to the west and connects with the A327 London Street to the east, which runs southwards away from the town centre. The IDR wraps around central Reading and includes an elevated section opposite the Site heading over the Bridge Street / A327 Southampton Street roundabout.
- 2.3. To the west, the Site is bound by Letcombe Street which extends from Mill Lane to a mixed residential and commercial area around the south of the Site, south of Mill Lane and the IDR. This area includes: Reading Central Club and small commercial uses to the east fronting the A327 London Street; Townsend House residential accommodation, the Quaker Meeting House and Saxon Court student accommodation to the south along Crossland Road; St Giles Church to the south-west; and the Premier Inn hotel adjacent to the west of the Site.
- 2.4. Crossland Road is a short cul-de-sac which connects with Letcombe Street and borders the Site to the south and east. The Site is accessed directly from Crossland Road at the south-west and north-east corners of the Site.
- 2.5. The town centre is located to the north of the Site across Mill Lane and the IDR, accessed via pedestrian crossings approximately 50m to the east or 60m to the west. The Oracle shopping centre and multi-storey car park are directly opposite to the north, providing a wide range of retail, entertainment and leisure facilities and restaurants along the River Kennet. Beyond The Oracle, to the north, is additional retail provision and town centre uses located along Broad Street and the surrounding streets, located within 500m of the Site. Reading railway station is located approximately 1km to the north which provides direct connections to London Paddington in 22 minutes.
- 2.6. Other local services and facilities located to the south of Mill Lane and the IDR, include St Giles Church, Katesgrove Primary School, Kendrick School (secondary) and South Street Arts Centre, all located within approximately 500m of the Site. The Royal Berkshire Hospital is located approximately 750m to the south-east and the University of Reading Whiteknights Campus is located approximately 2km to the south-east.

### Site Description

- 2.7. The Site itself totals approximately 0.44 hectares (ha) and currently comprises the vacant premises of the former John Lewis Depot with ancillary car park and servicing area.

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- 2.8. The former John Lewis Depot building is a 2-storey warehouse (ground floor and mezzanine levels) of approximately 2,566sqm (GIA) located centrally within the Site. A small customer car park is located at the western end of the Site and a loading and servicing area is located at the eastern end of the Site. The Site is relatively flat and is partially contained by trees and hedgerows around its northern and southern boundaries and by fencing around its southern, eastern and western boundaries.
- 2.9. The use of the existing building became surplus to requirements as a customer collection centre in 2021, with its functions having been transferred to the John Lewis department store at Broad Street, Reading. Based on the Council's Local Plan Proposals Map (November 2019), the Site is located within the boundary of the defined Reading Central Area and outside, but adjacent to, the Central Core, which covers land north of the IDR. The Site is also located within Flood Zone 1.
- 2.10. The Site is also located outside, but adjacent to, the Market Place / London Street Conservation Area, which includes land south and east of Crossland Road along the A327 London Street, as well as land along Church Street and St Giles Church to the south-west. There are a number of Grade II listed buildings within the Market Place / London Street Conservation Area, including nos. 44-46, 48-52, 54-58 and 62-66 London Street to the east, Reading Quaker Meeting House to the south and St Giles Church to the south-west.
- 2.11. In addition, the Site is located within an Area of Archaeological Potential and an Air Quality Management Zone which covers the entirety of central Reading.

## Planning History

### Site

- 2.12. Planning permission for the former John Lewis Depot was granted on 14<sup>th</sup> November 1996 for, "*Erection of warehouse with customer collection facilities, ancillary car park and servicing area*" (application reference 960750).
- 2.13. There have been no subsequent major planning applications at the Site of relevance to the current proposals.
- 2.14. On 9<sup>th</sup> January 2024, a request for an Environmental Impact Assessment (EIA) Screening Opinion was submitted to the Council in accordance with Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The request was accompanied by an EIA Screening Request Report (December 2023), prepared by AECOM, seeking an EIA Screening Opinion in relation to the proposed development of up to 216 dwellings at the Site. The assessment contained within the submitted EIA Screening Request Report (December 2023) concluded that the proposed development is not likely to result in significant adverse effects on the environment and as such, is considered not to constitute EIA development.
- 2.15. A formal EIA Screening Opinion (ref. 240040/SCR) was issued by RBC on 23 May 2024, which concluded that the proposals are not 'EIA development', as set out below:

*'Based upon the description of the development provided, the information provided in your submission received on 09/01/2024 (screening request 240040/SCR) the development is not considered to be likely to have significant effects on the environment.*

*Accordingly, in exercise of the powers conferred by Regulation 6 (6) (b) of the EIA Regulations 2017, the Council hereby considers that the proposed development described in your request and the documents submitted with it is not an 'EIA development', within the meaning of the EIA Regulations 2017, and hence a negative screening opinion is hereby adopted.'*

## Surrounding Area

- 2.16. Land within the immediate vicinity of the Site has been subject to the following recent applications which are of relevance to the current application hereby submitted.
- 2.17. Reading Central Club, adjacent to the Site to the east and fronting the A327 London Street, is allocated for residential use and potential community provision in the adopted Local Plan (2019) (Policy CR14h). A full planning application was submitted at the site in September 2022 for, *"Demolition of existing building (mural wall to be retained and restored), construction of new building to accommodate a community hall (Use Class F2) and 17 no. residential flats (Use Class C3), with associated works and landscaping"* (ref. 221364). A resolution to grant was secured at committee in July 2023 and full planning permission is expected to be formally issued pending completion of a Section 106 agreement.
- 2.18. Land at Yield Hall Place, The Oracle (including the existing Vue cinema and former Debenhams store), located to the north of the Site, is currently the subject of two live planning applications (refs. 221916 and 221917) for mixed-use redevelopment to provide up to 449 Build to Rent residential units with leisure, retail and commercial uses. The two planning applications were submitted in December 2022 and are currently with RBC for determination. Revised plans were submitted as part of the two live applications in March 2024.
- 2.19. In addition, in the wider area, a number of other Build to Rent developments have or are coming forward across Reading town centre, including:
- Thames Quarter, Napier Road – full planning permission was granted in November 2017 (ref. 162166) for the erection of a part-12 / part-23 storey building comprising 315 apartments. The development was completed in 2021 and comprises the first Build to Rent scheme in Reading.
  - Plot E & F, Station Hill – full planning permission was granted in 2021 (refs. 201537 and 201533) for demolition and redevelopment including 599 units. The development is currently under construction.
  - Broad Street Mall, Broad Street – a revised planning application was submitted in February 2024 (ref. 240173) for 644 units and commercial floorspace. The application includes revisions to previous planning permissions for redevelopment of the site which were approved in 2019 and 2021. The application is currently pending determination.

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## Development Plan Promotion

- 2.20. The Site has recently been promoted for Build to Rent development on behalf of JLP through the initial preparation of the LPPU, as referred to further in section 6 below.
- 2.21. In June 2023, the Site was submitted to the Council's 'Call for Sites' to state that the Site is suitable, available and able to deliver proposed residential development, comprising approximately 200 Build to Rent residential units together with flexible commercial and/or community uses as required, landscaping, amenity space and parking.
- 2.22. In January 2024, a response was submitted to the LPPU 'Consultation on Scope and Content' (Regulation 18) to support the identification of the Site (ref. Cen3) as a potential allocation for 'around 200 build-to-rent dwellings'.

## 3. Proposed Development

### Introduction

- 3.1. This section of the Planning Statement provides a description of the proposed development for which full planning permission is sought. This section should be read alongside the submitted plans and Design and Access Statement which accompany the planning application submission.

### JLP Vision

- 3.2. JLP believes it is socially responsible to make the best and efficient use of its buildings and land. By investing to transform some of its sites, JLP can provide professionally managed rental housing to help meet the increasing demand for housing, as well as create new and improved public spaces.
- 3.3. JLP proposes to develop and manage the homes themselves, for the long term and deliver high-quality buildings that are thoughtfully designed and managed to the same high standards expected of its John Lewis and Waitrose brands.. Residents would rent directly from a trusted brand, providing them with greater certainty of tenure.
- 3.4. The benefit for JLP Partners, as its employees are known, is being able to do more to help strengthen the areas it serves, while generating stable income from renting homes to support ongoing investment back into John Lewis and Waitrose. JLP is proposing to invest for the long term, solidifying its future commitment to Reading and providing great experience in home rental for local people.
- 3.5. The proposed development at the Site in Reading is JLP's third Build to Rent project, with live planning applications to redevelop two other JLP sites in London currently being determined.
- 3.6. The proposed development is guided by a series of overarching key principles:
- Thoughtfully designed, sustainable development;
  - Creation of well design, future proved 'Healthy homes';
  - Regeneration of under-utilised brownfield site;
  - Community centred, outward facing development ensuring residents and the local community are fully integrated.
- 3.7. Accordingly, the proposed development has been designed:
- To reinforce the frontage along Mill Lane and the IDR;
  - To incorporate active ground floor uses and residential accommodation above.
  - To create generous landscaped public realm along Mill Lane, providing a safer and more pleasant environment.
  - To deliver new landscaped courtyards to the south, for the benefit of residents and the wider community.

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- 3.8. The building's massing and appearance has been carefully crafted to reflect the character of the surrounding area, being located between the more urban town centre and the Market Place / London Street Conservation Area.
- 3.9. JLP is looking to bring forward an attractive, locally distinctive and thoughtfully designed development which welcomes people into the centre of town and supports the regeneration of this part of Reading.

## Overview

- 3.10. The description of the proposed development is as follows:
- “Demolition of the existing building and redevelopment of the site comprising erection of a new building for up to 215 build to rent residential dwellings (Use Class C3) together with flexible commercial / community space (Use Class E/F1/F2), residents’ facilities, landscaping, public realm, amenity space, cycle parking and disabled car parking.”*
- 3.11. A Proposed Site Plan (ref. 08278-CJA-ZZ-ZZ-DR-A-0100) together with proposed floor plans, elevations and sections accompany this planning application and illustrate the proposed development at the Site.
- 3.12. The submitted proposals have been informed by detailed design and technical work and have evolved through detailed pre-application engagement with RBC and the local community.
- 3.13. The proposed development is summarised as follows:
- 215 new homes (Use Class C3), including 14 accessible homes (M4(3)) and a mix of studio, 1, 2 and 3-bed homes, with accompanying residents’ facilities (including a lounge, flexible work from home and dining space and gym);
  - Provision of 10% affordable housing (provided as Affordable Private Rent) based on viability assessment and subject to discussions with the Council;
  - 74sqm flexible commercial / community space (Use Class E/F1/F2);
  - 3 accessible car parking spaces;
  - 4 on-street ‘essential use’ car parking spaces for use by the residents of the affordable housing;
  - 1 off-site Car Club space;
  - 114 internal residents’ cycle parking spaces and 3 external cycle stands;
  - 718sqm external amenity space, comprising a 359sqm residents’ wellness garden and 359sqm neighbourhood garden; and
  - Landscaping, biodiversity enhancements and public realm improvements.

## Design and Layout

- 3.14. The design and layout of the proposed development is illustrated on the Proposed Site Plan (ref. 08278-CJA-ZZ-ZZ-DR-A-0100) and accompanying proposed plans and is explained further within the Design and Access Statement.

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- 3.15. As illustrated on the Proposed Site Plan (ref. 08278-CJA-ZZ-ZZ-DR-A-0100) it is proposed that the building footprint will extend across the Site and be designed around supporting infrastructure, including landscaping, public realm, parking and boundary treatment. The development comprises a continuous built form fronting Mill Lane with three 'fingers' designed around two south-facing courtyard garden areas.
- 3.16. The ground floor layout includes an active frontage along Mill Lane and around the Site boundaries, through the inclusion of active uses and the use of glazing. A clear defined entrance with step-free access is proposed towards the north-eastern corner of the Site fronting Mill Lane, adjacent to a flexible community / commercial space. A large communal lobby area is proposed which will connect with supporting residents facilities (including a lounge, flexible work from home and dining space, gym and cycle store, with access to the residents' wellness garden and neighbourhood garden) and operational facilities (including waste lobby areas and plant rooms).
- 3.17. Replacement and additional landscaping planting is proposed along the Mill Lane frontage and around the Site boundaries with enhanced public realm areas. Three accessible parking spaces are proposed at the end of Crossland Road close to the main entrance.

## Scale and Massing

- 3.18. The proposed scale and massing of the development is illustrated on the Proposed Elevations (refs. 08278-CJA-ZZ-XX-DR-A-0701 to 08278-CJA-ZZ-XX-DR-A-0703) and accompanying proposed plans and is explained further within the Design and Access Statement. The scale and massing has been established based on detailed analysis of the existing context and key local viewpoints and detailed pre-application engagement with RBC and Design South East.
- 3.19. The height of the building ranges from predominantly 7 to 11 storeys (ground floor plus 6 to 10 storeys) across the three fingers of the development, stepping down to 5-6 storeys (ground floor plus 4 to 5 storeys) in the south-east of the Site towards the courtyard garden areas and Conservation Area.
- 3.20. The floor area of each storey is summarised in Table 1 below.

Table 1: Proposed Building GIA (sqm)

| Level        | Building GIA (sqm) |
|--------------|--------------------|
| 0            | 2,236              |
| 1            | 2,241              |
| 2            | 2,241              |
| 3            | 2,241              |
| 4            | 2,241              |
| 5            | 2,085              |
| 6            | 1,965              |
| 7            | 1,302              |
| 8            | 1,302              |
| 9            | 1,265              |
| 10           | 540                |
| <b>Total</b> | <b>19,659</b>      |

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## Housing Mix

- 3.21. The application proposes a total of 215 dwellings across a range of studio / 1-bedroom to 3-bedroom dwellings distributed across the building. 49% of the homes are family sized. The overall housing mix is set out in Table 2 below.

Table 2: Proposed Housing Mix

| Unit Type                   | No. / % of Units (rounded %) |
|-----------------------------|------------------------------|
| 1-bed 1-person              | 20 (9%)                      |
| 1-bed 2-person              | 81 (38%)                     |
| 1-bed 2-person (accessible) | 10 (5%)                      |
| 2-bed 3-person              | 10 (5%)                      |
| 2-bed 4-person              | 78 (36%)                     |
| 2-bed 4-person (accessible) | 4 (2%)                       |
| 3-bed 4-person              | 6 (3%)                       |
| 3-bed 5-person              | 6 (3%)                       |
| <b>Total</b>                | <b>215</b>                   |

## Affordable Housing

- 3.22. JLP's commitment is to deliver as many Affordable Private Rent homes as viably possible to help address the shortage of high-quality accommodation for local people, including key workers and others on lower incomes. However, recent significant increases to build costs, requirements to meet latest fire and other regulations, higher interest rates and softening of property yields have severely impacted the ability to deliver affordable homes.
- 3.23. In setting out the affordable housing proposal, consideration has been given to making sure the homes provided are genuinely affordable and assist the Council to meet the challenges faced with meeting housing need.
- 3.24. The proposals set out reflect JLP's long-term ownership of the new BTR community and commitment to delivering as many affordable homes as viably possible.
- 3.25. Following pre-application discussions, JLP has made a commercial decision to deliver 10% affordable housing, provided as Affordable Private Rent (APR) at rental levels set at Local Housing Allowance levels (based on an accompanying Viability Assessment and subject to discussions with the Council). The units will be built and fitted out to the same high standards and benefit from access to the communal residents' facilities and services as the market housing. The APR tenure and JLP's commitment to pepper potting homes provides a high level of flexibility to manage the number and rent levels of homes, should circumstances change.

- 3.26. The proposed development will also be subject to a review mechanism which will be secured via the Section 106 agreement. This will enable the Council to secure additional affordable housing and/or APR at a greater discount to market rent, should the proposed development economics increase when compared to the application stage viability scheme.
- 3.27. JLP will enter into discussions with the Council regarding how the homes will be allocated and who will be eligible to rent them. Full details will be included in the Section 106 Agreement.

## Highways, Access and Parking

- 3.28. The scheme proposes a car-free environment, with the exception of 3 accessible parking bays, 4 parking spaces proposed for essential use by occupiers of the affordable housing, and 1 car club space. The accessible parking spaces will be located at the eastern end of Crossland Road close to the main entrance. The 4 parking spaces for occupiers of affordable housing proposed to replace existing underutilised pay and display parking spaces along Crossland Road adjacent to the south of the Site. The Car Club space is proposed to replace one existing pay and display parking on Mill Lane.
- 3.29. A total of 114 cycle parking spaces will be provided in a communal cycle store fronting Mill Lane adjacent to the main entrance. Cycle parking will be provided at a ratio of 0.5 spaces per 1-2-bed unit and 1 space per 3-bed unit. In addition, three Sheffield stands are proposed to be located adjacent to the main building entrance to serve the flexible commercial/community space.
- 3.30. The main pedestrian entrance is located at the north of the Site fronting Mill Lane where step-free access is provided into a communal lobby area. Access is also available off Crossland Road into the proposed neighbourhood garden.
- 3.31. Servicing, deliveries and refuse collection will be made via the existing access point at the eastern end of the Site from Crossland Road. Refuse collection will also be made at the western end of the Site along Letcombe Street. The existing access to the customer car park off Crossland Road will be closed and the footway and kerb reinstated.
- 3.32. It is proposed that the 2 existing 16m high mast lighting columns, located on Mill Lane along the northern site boundary, will be replaced with 6 new 8m high lighting columns along Mill Lane and Letcombe Street.

## Landscaping

- 3.33. The proposed Landscape Strategy and landscape drawings accompany the planning application submission.
- 3.34. As set out within the Landscape Strategy, the proposed landscape design is based on the following interlinked principles:
- Enhancing the quality of public realm, providing neighbourhood benefit and contribution to the regeneration of the town centre and local area;

- Contributing to making the town centre and local area an inclusive, safe, family friendly place;
- Creating habitats to significantly enhance biodiversity in the town centre and local area, reinforcing the JLP biophilic design approach;
- Maximising positive interaction of inside/outside space and a range of activity to promote healthy lifestyles;
- Designing the landscape as green infrastructure, including rainwater attenuation.

3.35. The landscape strategy includes the retention and enhancement of boundary planting around the Site boundaries together with the creation of a neighbourhood garden and wellbeing garden in courtyard areas fronting Crossland Road.

3.36. JLP is keen to actively create new publicly accessible open green spaces. The neighbourhood garden (approximately 359sqmf) is proposed to serve the local community and will provide a space for a number of different uses, including a family nook, quiet corner, natural play, social space, growing space, mound and copse and co-working terrace. This will support the local community where green space is lacking and facilitate the integration of the new and existing communities.

3.37. The wellness garden (approximately 359sqm) will focus on the wellbeing of residents of the new development and will provide a series of spaces including a lounge terrace, orchard, celebration kitchen terrace, shade garden, wellness terrace and quiet corner.

## **Biodiversity**

3.38. The additional landscaping and planting proposed will provide additional resources to boost species biodiversity. A number of biodiversity enhancements are proposed that will support an increase in biodiversity (272%) significantly in excess of the required minimum 10% biodiversity net gain. Measures include:

- Biodiverse ground level planting (planting of hedging and trees along the Mill Lane frontage and a growing area in the wellness and community gardens);
- Brown roofs;
- Bird boxes (swift/house martin boxes and starling boxes);
- Bat boxes (integrated bat boxes);
- Insect refugia (bee boxes, bee cubes and insect hotels with garden areas).

## **Drainage**

3.39. The proposed surface water and foul drainage strategy is set out within the Flood Risk Assessment and Drainage Strategy which accompanies the planning application submission.

3.40. The proposed surface water drainage strategy includes siphonic drainage from the roofs and two cellular storage tanks beneath the courtyard areas. A pumping station is proposed towards the south of the site with a hydrobrake towards the north of the site to discharge surface water to the existing Thames Water network on Letcombe Street.

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3.41. Sustainable urban drainage features are proposed to be integrated including through the provision of landscaped courtyard gardens and permeable paving.

3.42. It is proposed that foul water will also be discharged into the existing Thames Water network.

### **Energy and Sustainability**

3.43. The proposed development meets high sustainability targets, including low carbon design and operation, improved sustainable travel provision and increased landscaping to improve local biodiversity.

3.44. The Energy Strategy, accompanying the planning application submission, has been developed using a 'fabric-first' approach by incorporating a combination of sustainable detailed design measures. This includes utilising low and zero carbon technologies to heat and power the development and incorporating low flow water fittings.

3.45. Passive design and energy efficiency measures has been incorporated into the design, including highly-insulated building fabric, airtight construction and highly-efficient mechanical and electrical systems.

3.46. The heating and cooling energy will be generated via an 'all electric / combustion-free' engineered solution utilising Exhaust Air Heat Pumps (EAHPs) serving each individual dwellings heating and hot water. In addition, the provision of solar photovoltaic (PV) panels will be provided on available roof space.

3.47. A Home Quality Mark (HQM) rating of 4 stars is currently being targeted which demonstrates JLP's focus on creating homes and spaces with high levels of performance for sustainability and quality for residents.

## 4. Pre-Application Engagement

### Introduction

- 4.1. The NPPF (December 2023) encourages early pre-application engagement in order to “improve the efficiency and effectiveness of the planning application system for all parties” and to deliver “improved outcomes for the community” (paragraph 39). This advice is reflected in the Council’s adopted Statement of Community Involvement (SCI).
- 4.2. Accordingly, JLP has undertaken detailed pre-application engagement to inform the proposed development as summarised below. A Statement of Community Involvement (‘SCI’) also accompanies the application.

### Pre-Application Engagement with Reading Borough Council

- 4.3. JLP has actively engaged with RBC Officers through a number of pre-application discussions. Following early engagement and initial scoping meetings held between 2020 and 2022, JLP entered into a Planning Performance Agreement (PPA) with RBC in August 2023 and has subsequently had a number of detailed pre-application discussions with officers and members, as listed below:

#### Early Pre-Application Discussions with RBC

- December 2020 – initial scoping meeting held with RBC planning officers and members;
- January 2022 – further scoping meeting with held with RBC planning officer;
- June / August 2022 – pre-application submission with written response received from RBC planning officer;

#### Detailed Pre-Application Discussions with RBC

- **March 2023** – pre-application meeting (virtual) held with RBC Assistant Director Planning, Transport and Regulatory Services to renew engagement;
- **August 2023** – PPA signed with RBC planning officer;
- **August 2023** – pre-application meeting held with RBC planning officer to reintroduce JLP Build to Rent proposals and revised development proposals;
- **September 2023** – pre-application meeting (virtual) held with RBC planning officer to discuss heritage, EIA considerations and latest design proposals;
- **October 2023** – pre-application meeting held with RBC planning and conservation officers to discuss heritage assessment work and design evolution;
- **November 2023** – pre-application meeting held with RBC planning and conservation officers to discuss revised scale and massing options and scoping of technical work;
- **December 2023** – pre-application meeting held with RBC planning and highways/drainage officers to discuss technical highways and drainage matters;
- **January 2024** – pre-application meeting held with Council members to explain JLP development proposals;

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- **January 2024** – pre-application meeting held with planning officer to discuss latest design updates;
- **February 2024** – pre-application meeting (virtual) held with planning officer and natural environment officer to discuss landscaping and ecology;
- **March 2024** – pre-application meeting (virtual) held with planning officer to discuss design updates following DRP and public consultation;
- **March 2024** – pre-application meeting (virtual) held with planning, housing and viability officers to discuss affordable housing;
- **July 2024** – pre-application meeting (virtual) held with planning, housing and viability officers to discuss updates on affordable housing proposals;
- **August 2024** – pre-application meeting held with Council members to provide update on JLP development proposals.

## RBC Pre-Application Feedback and JLP Response

- 4.4. Pre-application feedback has been received from RBC throughout the course of the early and pre-application discussions referred to above. JLP has considered the advice received on an ongoing basis and the proposals have evolved accordingly throughout this process to inform the current planning application submission, as summarised further below.
- 4.5. A formal pre-application response was subsequently received from RBC in May 2024. Table 3 below summarises the Council's pre-application feedback and sets out JLP's response.

*Table 3: Summary of RBC Pre-Application Feedback and JLP Response*

|                  | RBC Pre-Application Feedback                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | JLP Response                                                                                                                                                                                                                   |
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| <b>Principle</b> | <p>The principle of development has been discussed with Officers from an early stage, having regard to the current Local Plan (2019) site allocation.</p> <p>Officers have confirmed during recent pre-application discussions that they are comfortable in principle for the site to come forward for residential development, taking into account the provisions of the emerging LPPU and other material considerations (as referred to further below). The Council's written pre-application response (page 8) states, <i>'Given the nature of the site as a vacant brownfield site within the town centre, combined with the forthcoming Local Plan changes, a proposal for redevelopment of the site would be considered as potentially acceptable'</i>.</p> | <p>Section 6 of this Statement further demonstrates that the principle of development is acceptable.</p> <p>Justification for the loss of the existing employment use is also provided within section 6 of this Statement.</p> |

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|                             | Justification has been requested for the loss of the existing employment use.                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Design and Townscape</b> | <p>The Council's pre-application response (page 10) suggests that greater height differential across the site would help to break-up the proposed massing and should be explored further.</p> <p>The Council consider that the height differences would not read well in townscape terms.</p> | <p>The proposed height and massing of the building has been explored throughout and in response to the detailed pre-application discussions. The placement of greater massing to the less sensitive, northern parts of the Site responds to the surrounding taller scale of buildings which align the IDR. The massing has been reduced in height, towards the low-scale character of buildings comprising the Conservation Area. The design evolution and timeline is highlighted within Section 4 of the submitted Design and Access Statement.</p> <p>Townscape views have been conducted in accordance with the views agreed with RBC. The visual assessment is presented at Section 11 of the submitted Heritage, Townscape and Visual Impact Assessment. The townscape assessment concludes that, owing to the site location and the existing building, the proposed development would have moderate beneficial of minor beneficial likely effects on townscape character areas,.</p> |
|                             | <p>The Council's pre-application response (page 10) recommends that the proposal steps down from the larger scale buildings on the north side of the IDR and has a more intimate relationship with the smaller scale buildings on the southern side of the IDR.</p>                           | <p>The proposed massing and form of the building has been developed in conjunction with RBC through a number of detailed pre-application design meetings. The massing has been revised several times through the design evolution to seek to provide a better transition to the Market Place &amp; London Street Conservation Area.</p> <p>The west of the site was the agreed location for greater height on the site to ensure the building was not seen from London Street (Market Place &amp; London Street Conservation Area). The arrangement of storey heights has incorporated lower scale blocks of six and four storeys to the east of the Site, in closest proximity with the surrounding residential development. This has mitigated the scale of the building in key views from within the Conservation Area, as well as the breaking up of massing blocks through a three-fingered approach.</p>                                                                              |

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|  |                                                                                                                                                                                                                                                                                         | <p>A setback to the uppermost storey and use of a lighter brick tonality at upper levels, allows the taller components to appear as more subtle additions on the skyline.</p> <p>The design evolution and timeline is highlighted within Section 4 of the submitted Design and Access Statement.</p>                                                                                                                                                                                                                                                                                                                         |
|  | <p>The Council's pre-application response (page 11) recommends giving consideration to making the entrance more prominent and ensuring there is a clear top to the building.</p>                                                                                                        | <p>The entrance design has been refined following recent pre-application discussions. The entrance has now been given its own 'bay' flanked by grey brick sections to provide a marker for the entrance on Mill Lane. Glazed brickwork and a corbeled white brickwork surround also mark the entrance at ground floor.</p> <p>The building is designed with a top, middle, and base. The 'crowns' have different treatments which include feature brickwork and corrugated metalwork. The detailing to the rear is simpler than Mill Lane to respond to the adjacent Market Place &amp; London Street Conservation Area.</p> |
|  | <p>The Council's pre-application response (page 11) acknowledges that some blank façade is expected, but recommends considering innovative approaches to ensure that these areas (particularly waste storage and plant areas at the western end) are not blank and hostile facades.</p> | <p>Increased activation has been provided to the ground floor frontages where possible through the introduction of a community/commercial space at ground floor and by glazing parts of the plant spaces to exhibit how the building works.</p> <p>The refuse stores have been located and designed to allow for on-street collection, based on the requirements of RBC waste team and the existing site levels.</p> <p>External lighting has also been considered along Letcombe Street to ensure that adequate lighting is provided.</p>                                                                                   |

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|  | <p>The Council's pre-application response (page 11) notes that the interaction between the building, the two courtyards and Crossland Road to the rear of the site is positive, particularly the provision of one of the courtyards as public open space, although further information is requested on how this would be secured, accessed and managed. The response adds that the public nature of the second open space area needs to be adequately demonstrated.</p> | <p>The design of these spaces has been developed with a very clear strategy regarding access, security and management.</p> <p>The design of the Neighbourhood Garden has been led by two priorities: firstly to make the garden visually and physically accessible to the public and, secondly, to provide facilities that the public will want to use.</p> <p>The level of Crossland Road is lowest nearest the south corner of the Neighbourhood Garden, so this is the best opportunity to provide easy step free public access. The gardens are enclosed by a 1200mm high railing, so that they are visible from the public footway and road. The gate is positioned and orientated to give views down into the garden whilst walking along the public footway. Furthermore, there is no boundary hedge adjacent to the Neighbourhood Garden, so that the garden and publicly accessible facilities are clearly visible from the public footway. The gate can be locked at night if necessary. There is a gate between the Neighbourhood Garden and the Wellness Garden, ensuring that the latter is secure from public access, so is used by residents and their guests only.</p> <p>The south side of the garden, most visible from the public footway, is in the form of a slope with timber and stone playable landscape, which is also prominent from the gate. Seats are placed in sunny and shaded locations. There is also a small area with play features for young children, with seating for family. The central mounded lawn with trees is multi-purpose, suitable for play or relaxing.</p> <p>All of the garden spaces will be managed by JLP, with input from the residents. Further to that, the Neighbourhood Garden will be managed with input from local partnerships, as set out in the submitted Social Value Strategy.</p> |
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| <b>Heritage</b> | <p>The Council's pre-application response (page 12) states that, given the location of the site in close proximity to a number of Listed Buildings and the Conservation Area, any proposal on the site would likely have an impact on these assets. The Council's response notes that it is important to ensure that the impact is either to enhance the heritage assets, or where that is not possible, harm is minimised and that the public benefits of the scheme would outweigh any harm arising.</p> <p>The Council's response states that the overall design approach (in terms of materials, details, ground floor layout and provision of green space) is supported, but the proposed scale, height and massing of the proposals would cause less than substantial harm, at a low to moderate degree, to the character of the Conservation Area.</p> | <p>Comments made in relation to the identified harm to the character and appearance of the Conservation Area and the setting of nearby listed buildings have been addressed in section 9 of the submitted Heritage, Townscape and Visual Impact Assessment (HTVIA).</p> <p>As demonstrated in the HTVIA, there will be no intervisibility between the principal façades of the listed buildings on London Street and the proposed development. The proposed development would be visible only from the rear of these buildings, along the boundary of the Conservation Area. The existing condition of this outlook is poor, characterised by modern infrastructure, large scale commercial development and light industrial buildings. The HTVIA therefore identifies no harm to the listed buildings on London Street.</p> <p>Heritage assets in close proximity to the proposed development are considered to benefit from the introduction of landscaping and active ground floor frontage, which will increase pedestrian movement and appreciation of heritage assets.</p> <p>Section 6 of the Planning Statement explains that there are a number of significant and wide-ranging public benefits. The HTVIA concludes that the public benefits significantly outweigh the harm caused to the designated heritage assets.</p> |
|                 | <p>The Council's pre-application response (page 13) raises concern regarding the outlook from the listed Quaker Meeting House, which is considered to result in less than substantial harm at a moderate level to the setting of the Listed Building.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>The proposed development would introduce a new building in the setting of the Quaker Meeting House. From within the courtyard and on Church Street, the Proposed Development would be viewed in conjunction with the listed building in views of the south elevation. The impact of the proposed development in the setting of the Meeting House has been mitigated through the variation in its massing and the use of contextual materiality. A full assessment is provided in section 9 of the HTVIA.</p> <p>The HTVIA concludes that the public benefits significantly outweigh the harm caused to the designated heritage asset.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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|  |                                                                                                                                                                                                                                                                      | Despite the introduction of the Proposed Development, the elements of its setting which contribute to its interest are maintained and its intrinsic value preserved. Overall, we have identified a low level of less than substantial harm to the Meeting House.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|  | The Council's pre-application response (page 13) requests that a Views Assessment, with Zone of Theoretical Visibility information is submitted alongside the application, together with a full Heritage Statement.                                                  | A full HTVIA is submitted with this planning application, and includes a visual assessment informed by a Zone of Theoretical Visibility (ZTV). The locations of verified views for the application have been agreed with RBC. The visual assessment is presented at Section 11 of the HTVIA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|  | The Council's pre-application response (page 13) states that, whilst the scheme has positive aspects in terms of the detailed design approach, the scale and massing of the scheme would result in a scheme which would fail to appropriately address the townscape. | <p>The proposed development would appropriately address the townscape through the design of the proposals.</p> <p>The design of the exterior facade comprises vertical proportions and columns, which seek to provide a strong vertical frontage opposite the large-scale buildings immediately opposite to the north. The vertical articulation not only contextualises the scale of the building but adds architectural interest and quality to the local character. The retainment of this building line to the IDR is a key characteristic of the TCA and one that is further enforced by the introduction of active frontages at ground floor level, on the northern elevation.</p> <p>The introduction of an open ground floor, with a well-defined principal entrance will provide better visual permeability and will enhance the building's relationship with the street. The proposed design and uses at ground floor will create vibrant and active frontage which will serve a placemaking function and improve the appearance of the Site boundary to the immediate north.</p> |

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|                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>In the wider context, and in more longer views, the incorporation of a distinguished base, middle and crown seek to mitigate the impact of scale, adding a human proportionality to the building. The top of the building will be particularly distinguishable through the use of vertical corbels and parapet detailing. The visibility of this element of the building from the wider townscape, will have a wayfinding function and thus increased permeability towards the Site.</p>                                                                                                                                                                                                                                                            |
| <b>Housing Mix</b>  | <p>The Council's written pre-application response (page 14) refers to Policy CR6 and states that a maximum of 40% of units should be 1 bedroom/studios, with a minimum of 5% of units being 3 bedroom dwellings. The pre-application response notes that the proposals provide 51% 1-bedroom/studio, 43% 2-bedroom units and 6% 3-bedroom units, and no information has been provided to justify this mix.</p> <p>During pre-application discussions, Officers have however welcomed the proportion of 3-bedroom / family-sized units proposed.</p> | <p>The proposed unit mix has evolved throughout pre-application discussions based on updates made to the proposed scale and massing of development.</p> <p>As acknowledged during pre-application discussions with Officers, Policy CR6 is clear that the maximum threshold is a 'guide' and that viability is also a consideration.</p> <p>The proportion of 3-bed units exceeds the minimum requirements set out in Policy CR6 and the proposed development also includes a significant proportion of larger 2-bed units, supporting the overall identified need for family housing set out in Policy H2.</p> <p>Justification for the proposed mix is further set out in section 6 of this Statement and the accompanying Viability Assessment.</p> |
| <b>Unit Quality</b> | <p>The quality of accommodation has been supported by Officers during pre-application discussions, especially in light of recent changes to provide more dual aspect units. The Council's written pre-application response (page 14) states that, <i>'Generally, the proposals would provide units that would be of an appropriate quality.'</i></p> <p>The pre-application response acknowledges that single-aspect units facing the IDR have been 'minimised' but notes some concerns regarding the remaining single-aspect units.</p>            | <p>The proposals have been revised during the course of pre-application discussions to introduce access decks to the two middle sections of the building. This has significantly increased the number of dual aspect homes within the development from 96 (46%) to 148 (68%) units and has minimised the number of single-aspect units (as acknowledged by Officers), as well as increasing the number of family homes provided. Whilst some single-aspect units remain due to the site dimensions and orientation, there are no policy requirements for all units to be dual-aspect and the overall proposals are of high quality design.</p>                                                                                                         |

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|  | A Daylight and Sunlight report is requested to be submitted.                                                                                                       | A Daylight and Sunlight Assessment accompanies this planning application. The Assessment concludes that the overall daylight and sunlight effects of the proposed development will not be detrimental to neighbouring occupants.                                                                                                                                                                                                                                                                                                                                                                                   |
|  | The Council's written pre-application response questions the approach taken to the proposed public and private external amenity areas at ground floor level.       | The design of these spaces has been developed with a clear strategy regarding access, security and management, as explained further above and detailed within the Landscape Strategy.                                                                                                                                                                                                                                                                                                                                                                                                                              |
|  | Balconies should be considered carefully and be acceptable in relation to air and noise pollution.                                                                 | Balcony positions have been reviewed based on the Daylight and Sunlight Assessment. The number of balconies has increased during pre-application discussions in response to feedback from members.                                                                                                                                                                                                                                                                                                                                                                                                                 |
|  | The potential for light pollution from the two lighting columns on the IDR frontage should be addressed in the application submission.                             | <p>A highways lighting assessment has been undertaken and accompanies the submitted Transport Assessment. It is proposed that the two existing lighting columns will be replaced with six new 8m high lighting columns along Mill Lane and Letcombe Street.</p> <p>Initial discussions have been held with Officers regarding the proposed approach to removing the two existing lighting masts and replacing them with smaller masts along the Mill Lane site frontage. The proposed approach has been acknowledged in principle subject to detailed design and further discussions with RBC's Highways team.</p> |
|  | A noise assessment is requested to be submitted and to identify mitigation measures to ensure that recommended standards are met.                                  | A Noise Assessment accompanies this planning application and concludes that, through the use of mitigation, noise can be controlled to suitable levels in line with Local Plan Policy EN17 and British Standard BS 4142.                                                                                                                                                                                                                                                                                                                                                                                           |
|  | The proposed development is located within an air quality management area. An assessment and/or mitigation measures should be provided as part of the application. | An Air Quality Assessment accompanies this planning application and concludes that the proposed development is acceptable when assessing exposure to representative sensitive receptors.                                                                                                                                                                                                                                                                                                                                                                                                                           |

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| <b>Affordable Housing</b> | The Council's written pre-application response recommends that the affordable housing proposals are reviewed and explains that a full viability assessment would be required to justify the current proposed affordable housing options. Rent levels are requested to be capped at Local Housing Allowance levels. The acceptance of late stage reviews is welcomed.                                                                                                                                                                                                                                                                                                                | JLP's commitment is to deliver as many affordable homes as viably possible. However, recent significant increases to build costs, requirements to meet latest fire and other regulations, higher interest rates and softening of property yields have severely impacted the ability to deliver affordable homes. The proposals set out reflect JLP's long-term ownership of the new BTR community and commitment to delivering as many affordable homes as viably possible. A full Viability Assessment accompanies this planning application. |
| <b>Neighbours</b>         | The Council's written pre-application response (page 17) states it is unlikely that there would be any significant harm to neighbour's living conditions. A daylight and sunlight assessment is requested to be submitted to ensure that there are no unacceptable impacts.                                                                                                                                                                                                                                                                                                                                                                                                         | A Daylight and Sunlight Assessment accompanies this planning application. The Assessment concludes that the overall daylight and sunlight effects of the proposed development will not be detrimental to neighbouring occupants.                                                                                                                                                                                                                                                                                                               |
| <b>Transport</b>          | <p>The proposals for a predominantly car-free scheme have been supported. The Council's written pre-application response states, <i>'The site's highly sustainable location ensures that a car free development is considered appropriate.'</i></p> <p>Initial discussions have been held, following review of local parking data, regarding the proposed use of existing off-site parking spaces on Crossland Road and Mill Lane for occupiers of affordable housing units and for a car club space. Officers have advised that the provision of dedicated on-street bays can be achievable subject to providing evidence and agreeing appropriate management of these spaces.</p> | 4 parking spaces are proposed for essential use by occupiers of the affordable housing, located at the eastern end of Crossland Road close to the main entrance. The 4 parking spaces for occupiers of affordable housing are proposed to replace existing underutilised pay and display parking spaces along Crossland Road adjacent to the south of the Site. This is explained and justified further within the submitted Transport Assessment, based on a review of local parking data.                                                    |

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|                                  | <p>The Council's pre-application response (page 17) states, the proposed cycle parking is '<i>in an appropriate location, providing well-located, accessible and secure facilities, which is welcomed</i>'. Detailed design advice has also been provided by Officers in relation to cycle parking provision.</p>                                                                                                                | <p>The Council's response is welcomed. The proposed cycle parking provision is explained further in the accompanying Transport Assessment.</p>                                                                                                                                                                                                                                                                                                                                                     |
|                                  | <p>A car club facility is considered to be important and could be positioned on Crossland Road should evidence be provided that the on street pay and display bays are underutilised.</p>                                                                                                                                                                                                                                        | <p>A Car Club space is proposed to replace one existing pay and display parking on Mill Lane. This is explained and justified further within the submitted Transport Assessment, based on a review of local parking data.</p>                                                                                                                                                                                                                                                                      |
|                                  | <p>The proposed refuse strategy was presented to Officers during pre-application discussions. Officers have been supportive of the principle of the proposed refuse collection points.</p> <p>The Council's written pre-application response (page 17) confirms that the proposed delivery, servicing and waste collections would be acceptable in this instance as the number of traffic movements in this location is low.</p> | <p>The Council's response is welcomed. The proposed refuse strategy is set out further in the submitted Operational Waste Management Strategy.</p>                                                                                                                                                                                                                                                                                                                                                 |
| <b>Trees, Ecology and Nature</b> | <p>The proposed approach to landscaping has been generally supported during verbal pre-application discussions held with Officers. In relation to landscaping and ecology, the natural environment officer provided advice in relating to existing and proposed tree planting, placement and species.</p>                                                                                                                        | <p>An Arboricultural Impact Assessment (AIA) has been prepared and accompanies this planning application. The AI explains that the proposed loss of trees will be mitigated with a high-quality scheme of new tree planting and associated landscaping works. It is proposed that 49 new trees will be planted, as shown on the accompanying submitted landscape plans, comprising an increase to the number and diversity of tree species to provide wider biodiversity and amenity benefits.</p> |
|                                  | <p>Officers have highlighted the requirement for at least 10% on-site BNG to be provided and would be supportive of any increase in BNG over and above requirements.</p>                                                                                                                                                                                                                                                         | <p>A number of biodiversity enhancements are proposed that will support an increase in biodiversity of 272%, significantly in excess of the required minimum 10% biodiversity net gain.</p>                                                                                                                                                                                                                                                                                                        |

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|                            |                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Flooding &amp; SUDS</b> | A drainage strategy should be submitted as part of the application and landscaping and SuDs should be considered together. Officers have confirmed that the proposals will need to include a reduced discharge rate from the existing brownfield rate and advised that green spaces / tree pits are utilised to provide drainage benefits.                                     | The proposed surface water and foul drainage strategy is set out within the Flood Risk Assessment and Drainage Strategy which accompanies the planning application submission. Sustainable urban drainage features are proposed to be integrated including through the provision of landscaped courtyard gardens and permeable paving.                                                                                                                                             |
| <b>Sustainability</b>      | The proposals should seek to be net zero, and where this cannot be achieved, an appropriate carbon offset financial contribution should be secured through a legal agreement. Measures such as heat pumps, PV panels and other sustainable measures should be considered to meet these requirements, and a fully Sustainability Strategy submitted as part of the application. | An Energy Statement and Sustainability Strategy have been prepared and accompany this planning application. Sustainable design measures such as Air Source Heat Pumps and PV panels are proposed. Overall, the energy assessment concludes that the proposed development will result in a reduction in regulated CO2 emissions of 64% after incorporation of heat pumps and PV. A remaining offset payment requirement is identified to be agreed through a Section 106 agreement. |

## Design Review Panel (DRP)

- 4.6. A design review meeting with Design South East (DSE) took place on 25<sup>th</sup> January 2024 to present and seek feedback on the emerging development proposals.
- 4.7. A formal written response was received on 8<sup>th</sup> February 2024. The feedback received is summarised as follows:
- The aspiration to provide high quality homes with an exemplary standard of shared amenities was commended;
  - Further exploration of the appropriate form, scale and massing of the development was recommended in order to ensure the development contributes to local townscape and provides high-quality living environments;
  - Further consideration of the experience and amenity of residents in relation to sunlight, daylight and outlook was recommended;
  - Further review of the ground floor layout was recommended to consider the location of the entrances and active frontages.

## Community Engagement

- 4.8. JLP has set out to actively involve and seek feedback from the local community, key groups and organisations in formulating the proposals. JLP has undertaken extensive and detailed engagement prior to the application submission, in order to understand local views and priorities and create opportunity to inform the proposed development. This approach is at the heart of JLP's ambitions and seeks to build on the existing relationships within the town.
- 4.9. The engagement activities undertaken have included:
- Two in person public exhibitions and one webinar event took place in January, February and March 2024. The events gave residents the opportunity to meet the project team and view detailed plans, as well as provide feedback. Over 4,000 local residents and business were informed about each of the events through the delivery of local flyers and local media adverts.
  - A webpage was set up to enable residents to learn more about the proposals, submit feedback and allow them to register for the consultation events. Details of the website have been widely publicised in local media.
  - A significant number of local stakeholder meetings with a wide variety of local groups were held between January and March 2024 and dialogue with these groups is ongoing and will continue.
  - The key groups which JLP continue to engage with are:
    - Reading Civic Society;
    - University of Reading;
    - Royal Berkshire Hospital NHS Foundation Trust;
    - Reading Cycling Campaign;
    - Reading International Solidarity Centre / Food 4 Families;
    - St Giles in Reading Church;
    - The Abbey School;
    - Katesgrove School;
    - Katesgrove Community Association;
    - Reading Conservation Area Advisory Committee.
- 4.10. Full details of the stakeholder and community engagement activities and the feedback received are detailed in the Statement of Community Involvement (SCI) which accompanies this planning application.

## Summary

- 4.11. As set out above, JLP has committed to undertaking full detailed pre-application engagement to inform the proposed development. JLP has considered the pre-application advice received from the Council, the community, key local stakeholders and the DRP and the proposals have evolved accordingly throughout this process to inform the current planning application submission.

4.12. In response to the pre-application feedback received, a number of changes have been made through the evolution and preparation of the development proposals and are reflected in the current application proposals. The evolution of the design during the pre-application phase is set out at section 4 of the accompanying Design and Access Statement and is summarised further below:

- During the course of pre-application discussions with officers and Design South East (DRP), the proposed scale and massing of development has been reduced and rearranged across the site. This has led to a transition in height along Mill Lane and the inclusion of a distinct step-down in massing to the south-east to reduce visibility and aid transition with the London Street / Market Place Conservation Area. A set-back has been included to the top floor and detailed design articulation has been added to the northern elevation in order to reduce the height along Mill Lane and add visual interest.
- Alongside amendments to the proposed scale and massing of the development, the materiality and detailing of the building façade has been refined to further break-up the massing and improve the visual appearance of the building, taking cues from local characteristics in the surrounding area and the London Street / Market Place Conservation Area;
- In response to feedback from officers and Design South East (DRP), the number of single-aspect north-facing units has reduced significantly and the number of dual aspect units has increased based on minor amendments to the building footprint and the inclusion of access decks;
- Amendments to the building footprint has also enabled increases to external amenity space provision in the south-facing neighbourhood and wellness gardens;
- In response to officer's feedback, one of the stair cores which was previously located along the southern elevation has been moved to the western elevation in order to help improve the appearance and relationship of the building with the neighbouring area and to further increase activation of a key elevation;
- The frontage of the building along Mill Lane has been further activated at ground floor level through the introduction of a community / commercial space and proposed glazing of plant rooms and the cycle store in order to improve the appearance and relationship of the building with the local area and wider public realm.
- In response to community feedback, the design of the proposed landscaping and garden areas has evolved to now include fruit trees and community growing space.

4.13. JLP is committed to continuing engagement with all stakeholders, following the current planning application submission.

## 5. Planning Policy Context

### Introduction

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 directs Local Planning Authorities to determine planning applications in accordance with the policies of the Development Plan unless material considerations indicate otherwise.
- 5.2. The adopted statutory Development Plan relevant to this planning application comprises the Reading Borough Local Plan (adopted November 2019).
- 5.3. Material considerations relevant to this planning application include national policy (primarily expressed through the National Planning Policy Framework (NPPF) (December 2023) and Planning Practice Guidance, as well as proposed reforms to national policy), the Council's emerging Local Plan Partial Update (LPPU) and additional guidance produced by the Council (including Supplementary Planning Documents (SPDs)).

### Development Plan

#### Reading Borough Local Plan (2019)

- 5.4. The Reading Borough Local Plan was adopted in November 2019 to guide development across the Borough until 2036. The key adopted Local Plan policies relevant to this application are set out below.

#### Site allocation

- 5.5. Policy CR14 (Other sites for development in Central Reading) allocates land including the Site for retail use and public car parking at 'The Oracle extension, Bridge Street and Letcombe Street' (ref. CR14g), as set out below:

#### *"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"*

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5.6. The allocation requires that the Site at Letcombe Street provides public car parking in conjunction with the development of additional retail or town centre uses at The Oracle shopping centre. However, in light of recent major changes in the retail sector and reduced demand for additional retail floorspace (and car parking) the allocation has not been delivered.

5.7. This is also acknowledged in the recent LPPU consultation document (November 2023), as referred to further below, which states, with regards to the Site (ref. Cen3):

*“This site is part of the existing allocation CR14g, for an extension to the Oracle involving retail floorspace to the north of this site and relocation of the car park onto this site. This was a longstanding allocation that predated the 2019 Local Plan, but there are no indications that it will be implemented, and the context for new retail has changed substantially in recent years.”*

## Other relevant Local Plan policies

5.8. Other key adopted Local Plan policies relevant to this application are set out below and are considered further at section 6 of this report.

- Policy CC1 (Presumption in Favour of Sustainable Development);
- Policy CC2 (Sustainable Design and Construction);
- Policy CC3 (Adaptation to Climate Change);

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- Policy CC4 (Decentralised Energy);
- Policy CC5 (Waste Minimisation and Storage);
- Policy CC6 (Accessibility and the Intensity of Development);
- Policy CC7 (Design and the Public Realm);
- Policy CC8 (Safeguarding Amenity);
- Policy CC9 (Securing Infrastructure);
- Policy EN1 (Protection and Enhancement of the Historic Environment);
- Policy EN2 (Areas of Archaeological Significance);
- Policy EN3 (Enhancement of Conservation Areas);
- Policy EN4 (Locally Important Heritage Assets);
- Policy EN5 (Protection of Significant Views with Heritage Interest);
- Policy EN6 (New Development in a Historic Context);
- Policy EN9 (Provision of Open Space);
- Policy EN10 (Access to Open Space);
- Policy EN12 (Biodiversity and the Green Network);
- Policy EN14 (Trees, Hedges and Woodland);
- Policy EN15 (Air Quality);
- Policy EN16 (Pollution and Water Resources);
- Policy EN17 (Noise Generating Equipment);
- Policy EN18 (Flooding and Sustainable Drainage Systems);
- Policy EM1 (Provision of Employment Land);
- Policy EM3 (Loss of Employment Land);
- Policy H1 (Provision of Housing);
- Policy H2 (Density and Mix);
- Policy H3 (Affordable Housing);
- Policy H4 (Built to Rent Schemes);
- Policy H5 (Standards for New Housing);
- Policy H10 (Private and Communal Outdoor Space);
- Policy TR1 (Achieving the Transport Strategy);
- Policy TR3 (Access, Traffic and Highway-Related Matters);
- Policy TR4 (Cycle Routes and Facilities);
- Policy TR5 (Car and Cycle Parking and Electric Vehicle Charging);
- Policy OU1 (New and Existing Community Facilities);
- Policy CR1 (Definition of Central Reading);
- Policy CR2 (Design in Central Reading);
- Policy CR3 (Public Realm in Central Reading);
- Policy CR6 (Living in Central Reading);
- Policy CR10 (Tall Buildings).

## Other Material Considerations

5.9. Section 70(2) of the Town and Country Planning Act 1990 (as amended) requires that all material considerations are taken into account in decision-making. The following material considerations are relevant to this planning application and are considered further below:

- National Planning Policy Framework (NPPF) (December 2023);
- Draft NPPF (July 2024);
- Planning Practice Guidance;
- Emerging Local Plan Partial Update (LPPU) (Regulation 18) (November 2023);
- Supplementary Planning Documents (SPDs):
  - Affordable Housing SPD (March 2021);
  - Employment, Skills and Training SPD (April 2013);
  - Revised Parking Standards and Design SPD (October 2011);
  - Planning Obligations under Section 106 SPD (April 2015);
  - Sustainable Design and Construction SPD (December 2019);
- Community Infrastructure Levy (CIL) Charging Schedule (2015)

## National Planning Policy Framework (NPPF) (December 2023)

5.10. The revised National Planning Policy Framework (NPPF) was published in December 2023 and is a material consideration in the determination of planning applications. It sets out overarching guidance against which development proposals will be judged and Local Plan policies should accord. Relevant guidance is summarised further below.

### *“Achieving sustainable development”*

5.11. The NPPF (2023) is clear that the purpose of the planning system is to contribute to the achievement of sustainable development which has economic, social and environmental objectives that are mutually supportive and interdependent (paragraph 8).

5.12. Paragraph 11 states that *‘plans and decisions should apply a presumption in favour of sustainable development’*, which for decision-taking means:

*‘c) approving development proposals that accord with an up-to-date development plan without delay; or*

*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date<sup>8</sup>, granting permission unless:*

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole’.*

- 5.13. Paragraph 38 encourages local planning authorities to “...*approach decisions on proposed development in a positive and creative way*” and “...*seek to approve applications for sustainable development where possible.*”
- 5.14. Paragraphs 39-46 emphasise the importance of early pre-application engagement, which “*has significant potential to improve the efficiency and effectiveness of the planning application system for all parties.*”
- 5.15. Paragraph 47 confirms that applications for planning permission should be determined in accordance with the development plan, unless material considerations indicate otherwise. In doing so, Paragraph 48 advises that local planning authorities may give weight to relevant policies in emerging plans.
- “Delivering a sufficient supply of homes”*
- 5.16. Paragraph 60 highlights that, ‘*To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed...*’.
- 5.17. Paragraph 66 states that major developments involving housing should provide at least 10% of the homes for affordable home ownership. An exception to this is where the proposal is for solely Build to Rent homes. The Glossary (page 67) explains that, “*For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).*” The Glossary defines ‘Build to Rent’ as: “*Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.*”
- 5.18. Paragraph 69 requires local planning authorities to “*identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.*” Paragraph 70 adds that, “*Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.*”
- “Building a strong, competitive economy”*
- 5.19. Paragraph 85 states that “*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.*”
- 5.20. Paragraph 86 advises that planning policies should be flexible enough to accommodate needs, allow for new and flexible working practices and to enable rapid responses to changes in economic circumstances.
- “Promoting healthy and safe communities”*
- 5.21. Paragraph 96 emphasises that planning policies and decisions should aim to achieve “*healthy, inclusive and safe places*” which promote social interaction, are safe and accessible and enable and support healthy lifestyles.

5.22. Paragraph 97 adds that planning policies and decisions should *“plan positively for the provision and use of shared spaces, community facilities...and other local services to enhance the sustainability of communities and residential environments”*.

5.23. Paragraph 102 states that *“access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.”*

*“Promoting Sustainable Transport”*

5.24. Paragraph 109 explains that *“Significant development should be focused on locations which are or can be made sustainable.”*

5.25. Paragraph 114 states that, in assessing applications for development, it should be ensured that appropriate opportunities are identified for sustainable transport modes, safe and suitable access is achieved for all users, the design of streets and parking reflects national guidance and any significant impacts on the transport network can be cost-effectively mitigated.

5.26. Paragraph 115 states that *“Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”*.

5.27. Paragraph 116 states that applications for development should: give priority first to pedestrian and cycle movements, address the needs of people with disabilities, create places that are safe, secure and attractive, and allow for efficient deliveries.

*“Making effective use of land”*

5.28. Paragraph 123 states that planning policies and decisions should *“promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.”*

5.29. Paragraph 124 adds that planning policies and decisions should:

- *“encourage multiple benefits from both urban and rural land...”*
- *“give substantial weight to the value of using suitable brownfield land within settlements for homes...”*
- *“promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively...”*

5.30. Paragraph 126 advises that *“Planning policies and decisions need to **reflect changes in the demand for land.**”* Paragraph 126 adds that: *“Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:*

- a) *it should, as part of plan updates, **reallocate the land for a more deliverable use that can help to address identified needs** (or, if appropriate, deallocate a site which is undeveloped); and*
- b) *in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.* [our emphasis]

5.31. Paragraph 128 encourages development that makes efficient use of land, taking into account identified housing needs, market conditions and viability, availability and capacity of infrastructure and services, the desirability of maintain an area's local character and the importance of well-designed and beautiful places.

*"Achieving well- designed places"*

5.32. Paragraph 131 explains that *"the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve"*.

5.33. Paragraph 135 states that developments should:

- *"function well and add to the overall quality of the area"*
- *be "visually attractive"*
- *be "sympathetic to local character and history"*
- *"establish or maintain a strong sense of place"*
- *"optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development"*
- *"create places that are safe, inclusive and accessible and which promote health and well-being".*

*"Meeting the challenge of climate change, flooding and coastal change"*

5.34. Paragraph 157 states that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk, encouraging the reuse of existing resources and supporting renewable and low carbon energy.

5.35. Paragraph 159 seeks to avoid inappropriate development in areas at risk of flooding and direct development away from areas at highest risk.

*"Conserving and enhancing the natural environment"*

5.36. Paragraph 180 requires decision-takers to protect and enhance the natural and local environment by protecting and enhancing valued landscapes, minimising impacts on and providing net gains for biodiversity and preventing unacceptable risks of soil, air, water of noise pollution of land instability.

5.37. Paragraph 189 seeks to ensure that sites are suitable for proposed uses taking account of ground conditions and any risks arising from land instability and contamination.

*"Conserving and enhancing the historic environment"*

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- 5.38. Paragraph 200 requires the significance of any heritage assets affected by a proposal to be assessed.
- 5.39. Paragraphs 205-208 seek to avoid harm to designated heritage assets and state that any harm to the significance of a designated heritage asset should require clear and convincing justification.

## **Draft NPPF (July 2024)**

- 5.40. On 30 July 2024, the new Labour Government published a draft NPPF, which is currently subject to public consultation until 24 September.
- 5.41. The proposed reforms are focused on increasing housing delivery and include particular changes relating to housing targets and housing land supply. Notably, guidance relating to development on brownfield land has been strengthened. Paragraph 122 of the draft NPPF now states that proposals on brownfield land 'should be regarded as acceptable in principle'.

## **National Planning Practice Guidance (PPG)**

- 5.42. The Government published national Planning Practice Guidance (PPG) in 2014 and have since updated relevant parts as appropriate. The PPG provides further detailed guidance accompanying the NPPF. The following sections of the PPG have been considered in the preparation of this planning application:
- Air quality;
  - Biodiversity net gain;
  - Build to rent;
  - Climate change;
  - Design;
  - Effective use of land;
  - Fire safety;
  - Flood risk and coastal change;
  - Healthy and safe communities;
  - Historic environment ;
  - Housing needs of different groups;
  - Housing supply and delivery;
  - Light pollution;
  - Natural environment;
  - Noise;
  - Planning obligations;
  - Travel Plans, Transport Assessments and Statements;
  - Viability; and
  - Waste.

## Emerging Local Plan Partial Update (LPPU)

- 5.43. The Council is currently preparing a Local Plan Partial Update (LPPU) to update and eventually replace policies in the current adopted Local Plan (2019).

### Local Plan Review (2023)

- 5.44. A Local Plan Review was undertaken by officers in March 2023 which identified that around half of existing Local Plan policies required updating, particularly in relation to the calculation of housing need and the spatial strategy for accommodating new development. The Local Plan Review (March 2023) explained that the standard methodology for calculating housing need results in a 'significantly higher' level of housing need for the borough.
- 5.45. The key adopted Local Plan policies relevant to this application which were identified as requiring updates are set out below:
- Policy CC2 (Sustainable Design and Construction);
  - Policy CC3 (Adaptation to Climate Change);
  - Policy CC4 (Decentralised Energy);
  - Policy CC7 (Design and the Public Realm);
  - Policy CC9 (Securing Infrastructure);
  - Policy EN4 (Locally Important Heritage Assets);
  - Policy EN12 (Biodiversity and the Green Network);
  - Policy EN14 (Trees, Hedges and Woodland);
  - Policy EM1 (Provision of Employment Land);
  - Policy H1 (Provision of Housing);
  - Policy H2 (Density and Mix);
  - Policy H3 (Affordable Housing);
  - Policy H4 (Built to Rent Schemes);
  - Policy H5 (Standards for New Housing);
  - Policy TR1 (Achieving the Transport Strategy);
  - Policy TR4 (Cycle Routes and Facilities);
  - Policy TR5 (Car and Cycle Parking and Electric Vehicle Charging);
  - Policy CR2 (Design in Central Reading);
  - Policy CR6 (Living in Central Reading); and
  - Policy CR14 (Other sites for development in Central Reading).

## Call for Sites (April 2023)

- 5.46. Subsequently, a 'Call for Sites' was published in April 2023. A response was submitted on behalf of JLP in June 2023 to state that the Site is suitable, available and able to deliver proposed residential development, comprising approximately 200 Build to Rent residential units together with flexible commercial and/or community uses as required, landscaping, amenity space and parking. The response also requested that Policies CR10 (Tall Buildings) and EM3 (Loss of Employment Land) are updated as part of the LPPU.

## Regulation 18 Consultation (November 2023)

- 5.47. A formal consultation on the LPPU 'Scope and Content' (Regulation 18) was published in November 2023. The consultation sought views on the Council's overall proposed approach to updating each policy and potential alternatives, with complete draft policy wording proposed to be presented at the next consultation.
- 5.48. As per officer's Local Plan Review (March 2023), the LPPU consultation document (November 2023) identified that around half of its current Local Plan (2019) policies are not up-to-date and require updating, including current policies relating to housing and site allocations in Central Reading – e.g. Policies H1 (Housing Provision), H2 (Density and Mix), H3 (Affordable Housing), H4 (Build to Rent Schemes) and CR6 (Living in Central Reading) and CR14 (Other sites for development in Central Reading).
- 5.49. The LPPU consultation document (November 2023) (paragraphs 8.50 – 8.51) noted that Build to Rent has become an increasingly important source of housing in Reading and will continue to have a role to play in housing in Reading.
- 5.50. Notably, the LPPU consultation document (November 2023) acknowledged that there have been changes to sites allocated under Local Plan (2019) Policy CR14 and new sites have now been identified as possible additions for allocation under Policy CR14, including:

***“John Lewis depot, Mill Lane (Cen3): potential redevelopment of warehouse (which forms part of the existing CR14g allocation) for around 200 build-to-rent dwellings”*** (paragraph 12.41).

- 5.51. A response was submitted to the LPPU Regulation 18 consultation on behalf of JLP in January 2024. The response supported the identification of the Site (ref. Cen3) as a proposed allocation for around 200 build-to-rent dwellings under the proposed updates to Policy CR14. In addition, responses were provided in relation to the proposed updates to Policies H1 (Housing Provision), H4 (Build to Rent Schemes), RL2 (Scale and location of retail, leisure and culture development) and CR6 (Living in Central Reading).
- 5.52. Further consultation (Regulation 19) on the LPPU is scheduled in late 2024 prior to submission, examination and adoption in 2025, based on the Council's Local Development Scheme (June 2024).

## Supplementary Planning Documents

### Affordable Housing SPD (March 2021)

- 5.53. The Affordable Housing SPD (2021) seeks to support policies in the Local Plan (2019) relating to affordable housing. Additional guidance is set out in relation to on-site affordable housing, off-site provision and viability.
- 5.54. The SPD requires that, as per Local Plan Policy H4, Build to Rent proposals provide 30% affordable housing on site, subject to viability considerations. The LPPU consultation document (November 2023) did not propose any change to this requirement. Provision is sought in the form of 'affordable private rent' which is 'at least 20% below local market rents' and 'set in relation to Local Housing Allowance (LHA) levels for Reading' (paragraphs 4.18-4.19). The management process and approach to eligibility are required to be set out in the Section 106 agreement.

### Employment, Skills and Training SPD (April 2013)

- 5.55. The Employment, Skills and Training SPD (2013) provides detailed guidance on how developers are expected to contribute to employment initiatives, such as creating apprenticeship, employment and training opportunities for the local workforce, at both the construction and end-user phases of development.
- 5.56. For developments of over 10 residential dwellings, requirements are set out for an Employment Skills Plan (ESP) or a financial contribution, to be secured via a Section 106 agreement.

### Revised Parking Standards and Design SPD (October 2011)

- 5.57. The revised Parking Standards and Design SPD (2011) provides guidance on the levels of parking required as part of new developments, as well as the design and layout of parking
- 5.58. The SPD sets out maximum car parking and minimum cycle parking standards for new development based on a zonal approach and the relative accessibility of individual sites. The Site is located within 'Zone 2', where the SPD includes the following guidance:
- A maximum standard of 1.5 car parking spaces per 1-2-bed unit and 2 car parking spaces per 3-bed unit, with 1 visitor space per 10 flats.
  - A minimum standard of 0.5 cycle spaces per 1-2-bed unit and 1 cycle space per 3-bed unit.
  - All developments providing up to 200 spaces are required to provide 3 disabled spaces.
  - Developments of more than 10 residential units are required to provide or support a car club on site, or demonstrate that the development will have access to a nearby car club.

## Planning Obligations under Section 106 SPD (April 2015)

- 5.59. The Planning Obligations under Section 106 SPD (2015) sets out the Council's approach for how planning obligations will be secured alongside the Community Infrastructure Levy (CIL) Charging Schedule (2015).
- 5.60. General advice is provided regarding how planning obligations will be sought in relation to matters including: open space, green infrastructure, highways, education, public realm, public art, community facilities, renewable energy and drainage. The SPD explains that development proposals will be assessed on a site-by-site basis with the individual circumstances of each site being taken into consideration.

## Sustainable Design and Construction SPD (December 2019)

- 5.61. The Sustainable Design and Construction SPD (2019) sets out the Council's commitments to seeking sustainable buildings and provides additional guidance to existing Local Plan policies in relation to energy efficiency, climate change adaptation, water management, waste reduction and decentralised energy.

## **CIL Charging Schedule (January 2015)**

- 5.62. The Council's CIL Charging Schedule was published in January 2015 and took effect from April 2015. A CIL charge of £179.29/sqm (2024 rate) is currently applied to all residential development in the borough.

## 6. Planning Assessment

- 6.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that all planning applications must be determined in accordance with the Development Plan, unless other material considerations indicate otherwise.
- 6.2. The Development Plan comprises the Reading Borough Local Plan (adopted November 2019) and relevant material considerations include the NPPF (December 2023), emerging LPPU and additional SPDs, as set out at Section 5 of this Statement.
- 6.3. This section of the Statement considers the key issues relevant to the planning balance and presents the case in favour of the application under the following headings:
- Principle of Development;
  - Assessing Potential Impacts;
  - Benefits of the Proposed Development; and
  - The overall Planning Balance.

### Principle of Development

#### Existing and emerging draft site allocation

- 6.4. The adopted Reading Local Plan (2019) (Policy CR14g) identifies the Site for development, and allocates the Site, together with land opposite across the A329, for 1,600-2,000sqm of retail or town centre uses 'between the River Kennet and Mill Lane' (i.e. The Oracle Shopping Centre) and public car parking at Letcombe Street (i.e. the Site). This allocation was carried forward from previous local planning policy which JLP were not involved in.
- 6.5. The allocation under Policy CR14g adds that, '*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.*' The policy wording is not clear whether these requirements relate to all or part of the site allocation, although the policy is focused primarily on development of the area north of the A329, with secondary use of the application site for public car parking. Notwithstanding this, the requirements of Policy CR14g relating to flood risk, heritage, archaeology and contamination are considered further below in relation to the proposed development.
- 6.6. In light of recent major changes in the retail sector and reduced demand for additional retail floorspace (and car parking) the allocation has not been delivered. The recent planning applications (refs. 221916 and 221917) submitted by Hammerson for proposed residential development at The Oracle shopping centre, noted above, include the existing Vue cinema and multi-storey car park which is part of the Local Plan allocation (Policy CR14g) for additional retail use. Notably, paragraph 7.29 of the submitted Planning Statement, accompanying planning application ref. 221917, states:

*"It is recognised that the site at Yield Hall Place 2 is allocated within the adopted Local Plan under Policy CR14(g) (The Oracle Extension, Bridge Street and Letcombe Street) for approximately 1,600 – 2,000sq.m of retail and/or town centre uses. As set out previously the Applicant, as owner of the site, is seeking a rationalisation of existing retail offer within Reading as they have identified an oversupply of retail floorspace within the shopping centre due to structural changes in the retail market. As such, there is not considered to be the need to provide additional retail floorspace at The Oracle as per the allocation under Policy CR14(g). The allocation also incorporates the multistorey car park adjacent to the Yield Hall Place site. Hammerson recognise that this site may have development potential over the longer term, depending on the longer-term trends on car park usage and may seek to repurpose part of the site over a further plan period. The current proposals do not prejudice any future proposals for the multistorey car park in the longer term."*

- 6.7. It is clear therefore that Hammerson does not intend to provide any additional retail floorspace at The Oracle nor based on this any car parking at the Site, as envisaged by Policy CR14g, and therefore the site allocation is clearly not deliverable.
- 6.8. The Council's own recent 'Review of the Reading Borough Local Plan 2019' (March 2023), undertaken to inform the current Local Plan Review, similarly states: *"it is likely that landowner intentions have changed regarding CR14g, the Oracle extension, as evidenced by recent applications for the centre, and is no longer expected to entail a retail extension in this location. This allocation is therefore unlikely to be deliverable and requires review"* (paragraph 3.794). On this basis, the Council's review concluded that Policy CR14 requires updating.
- 6.9. The subsequent LPPU consultation document (November 2023) acknowledged that there have been changes to sites allocated under Local Plan (2019) Policy CR14. The Site (ref. Cen 3) is thereby identified in the LPPU consultation document (November 2023) as a potential allocation for 'around 200 build-to-rent dwellings'.
- 6.10. Paragraph 126 of the NPPF (2023) is clear that planning decisions need to reflect changes in the demand for land, and that *"Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan... applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area."*
- 6.11. On this basis, having regard to the provisions of paragraph 126 of the NPPF (2023), the new recent identification of the site as a potential allocation for Build to Rent development and recent pre-application discussions, the principle of the proposed development is considered to be acceptable.

## Loss of existing employment use

- 6.12. The Site was originally granted planning permission for a 'warehouse with customer collection facilities' in November 1996 (application reference 960750) and JLP has subsequently occupied the building as a customer collection centre. However, as referred to above, the use of the existing warehouse building became surplus to JLP's requirements as a customer collection centre in 2021, with its functions having been transferred to the John Lewis department store at Broad Street, Reading. The established formal use of the existing building remains as a 'warehouse with customer collection facilities'.
- 6.13. Local Plan Policy EM2 seeks to direct industrial and storage and distribution uses to the A33 corridor in south Reading and to Core Employment Areas, with office development focused in central Reading and along the A33 corridor. Notably, the Site is not located within a designated Core Employment Area or within the A33 corridor and is thereby not specifically identified or protected for employment use.
- 6.14. Local Plan Policy EM3 seeks to prevent the loss of employment land in designated Core Employment Areas. In other areas outside Core Employment Areas, Policy EM3 states that a number of other matters will be considered when assessing proposals resulting in the loss of employment land, including: access, continued employment use, employment accommodation needs, residential amenity and character and the need for alternative uses. Supporting paragraph 4.3.12 adds that, *'There is a need for a certain degree of flexibility with existing employment land to allow an appropriate balance of uses to develop in the right locations. For this reason, it is not appropriate to simply apply a blanket protection to all existing employment areas.'*
- Access – whilst there is good access to the site in central Reading, the Local Plan is clear that industrial and storage and distribution uses should be directed to the A33 corridor which is more accessible to and from the strategic road network. The current development proposals for residential use provide an opportunity to improve accessibility to the site and town centre via sustainable modes.
  - Continued employment use – the established formal use of the existing building is specifically as a 'warehouse with customer collection facilities'. However, as explained above, the use of the existing building became surplus to JLP's requirements as a customer collection centre in 2021, with its functions having been transferred to the John Lewis department store at Broad Street, Reading. There is therefore no requirement for the continued use of the site for its approved use.
  - Employment accommodation needs / alternative uses – No up-to-date evidence has been published in relation to local employment needs. Further, based on the allocation of the site for alternative uses (public car parking) in the adopted Local Plan (2019), the principle of the loss of employment at the site has been established. Both national and local planning policy identify a significant need for additional housing provision, with the LPPU consultation document (November 2023) clear that Central Reading should be a focus for additional housing (as referred to further below) and the site (ref. Cen 3) specifically identified as a potential allocation for 'around 200 build-to-rent dwellings'. It is fully evident therefore that, in line with Policy EM3, the need for alternative uses is stronger than the need for retention of employment land at the site.

- Residential amenity and character – the area surrounding the site to the south is of a predominantly residential character, including Townsend House residential accommodation, Saxon Court student accommodation, the Premier Inn hotel and Reading Central Club (with a resolution to grant for residential use). The employment use of the site thereby contrasts with the overall residential character of the area. As referred to above, the Local Plan is clear that industrial and storage and distribution uses should be directed to the A33 corridor, and the LPPU consultation document (November 2023) proposed an ‘even stronger focus’ on Central Reading to meet identified local housing needs.

- 6.15. On the basis of the above, the proposed development accords with the provisions of Local Plan Policy EM3.

Housing provision and development of brownfield land

- 6.16. The NPPF (2023) (paragraph 60) highlights the Government’s objective of “significantly boosting the supply of homes” and is supportive of the redevelopment of sustainable brownfield land to meeting housing needs. The new draft NPPF (July 2024) includes a further strengthening of Government support for overall housing delivery and the development of brownfield land.

- 6.17. The adopted Local Plan (2019) (section 4.4) emphasises the ‘pressing need’ for housing and the ‘heavy reliance on previously developed land’ for the delivery of new housing. Local Plan Policy H1 makes provision for an average of 689 homes per annum to be delivered in the borough during the period 2013 to 2036. The Local Plan spatial strategy emphasises the sustainability of central Reading and states that around half of the borough’s housing provision will be developed in Central Reading (as set out at Local Plan paragraphs 3.2.3 and 3.2.4):

**‘Central Reading:** *The centre of Reading is the main hub of retail and employment for the Borough and for much of the surrounding area. It is one of the most accessible locations in the South East, boosted by recent major investment in an upgraded station, new transport interchanges and by the forthcoming arrival of the Elizabeth Line. At the same time, there are considerable areas of underused land around the edge of the centre which offer an opportunity to accommodate a considerable amount of development at a high density, which will include some opportunities for new tall buildings in appropriate locations.*

*Therefore, a significant proportion of the development to be provided in Reading within the plan period will be within the central area. This will include around 7,600 homes (around 49% of the total planned for), 71,000 sq m of offices (around 63% of the total planned for) and up to 27,000 sq m of retail and related uses (virtually all of the total planned for).’*

- 6.18. The recent LPPU consultation document (November 2023) explains that, *'The number of homes to be provided is the most significant question that the Partial Update must address, and the main reason that an update is required.'* The consultation document identifies a significant uplift in housing need in the borough for 877 homes per year up to 2041, based on the standard method and given that Reading is one of the largest urban centres where a 35% uplift is required. On this basis, the consultation document (paragraphs 3.5-3.7) proposed an 'even stronger focus' on Central Reading in order to meet identified local housing needs, with around 60% of new homes proposed to be delivered in the town centre during the LPPU plan period.
- 6.19. There is therefore clear support for additional housing provision on sustainable brownfield land in both national and local planning policy. The proposed development seeks to provide additional housing at a sustainable location in Central Reading to support identified needs and therefore fully accords with the aims of national and local planning policy.
- 6.20. It is noted the Local Plan (2019) states that *'The beneficial restoration and reuse of buildings should generally be considered before demolition and redevelopment'* (paragraph 4.1.23, supporting Policy CC5). The existing building is however a 2-storey warehouse (ground floor and mezzanine levels) which is considered to be of low-quality design with no architectural merit and which detracts from the visual amenity and townscape of the area, as explained in the accompanying Design and Access Statement and Built Heritage, Townscape and Visual Impact Assessment. It is clear therefore that the restoration and reuse of the existing building could not accommodate the amount or quality of residential units proposed to support local needs, or deliver the associated benefits of the proposed development. Further, the accompanying Sustainability Statement explains that the proposed development will embed the principles of circular design and minimal material wastage, with 90% of construction waste diverted from landfill, in accordance with the provisions of Local Plan Policy CC5.

## Build to Rent development

- 6.21. Local Plan Policy H4 states that, *'Planning permission will be granted for developments of self-contained, private rented homes...'*, subject to meeting specific criteria. Paragraph 4.4.31, supporting Policy H4, further explains that:
- "The Council wishes to encourage a private rented sector which provides high quality, professionally managed accommodation and a greater level of security for tenants than that which is offered by much of the current PRS market. We will support institutional investment in the sector where benefits are secured for residents and the economy of the Borough and where this produces high quality development with positive benefits for the Borough. Such schemes will normally be larger scale developments of more than 50 units to achieve the level of quality and facilities and to efficiently provide the high quality of management that is needed to support such accommodation."*
- 6.22. The recent LPPU consultation document (November 2023) (paragraphs 8.50 – 8.51) noted that, *'Build to Rent has become an increasingly important source of housing in Reading'* and *'will continue to have a role to play in housing in Reading'*.

- 6.23. As explained above, JLP proposes to develop and manage the private rented homes themselves and deliver high-quality accommodation that is designed and managed to the same high standards that is synonymous with the JLP brand. The new rental homes will be offered with longer tenancies (up to 3 years with options to renew), ensuring renters can put down roots and stay for as long as they want. The proposed development will provide a number of benefits for residents and the local area, including the provision of a mix of high quality homes to support local needs, the development of an attractive and sustainable high quality residential environment (including flexible work from home spaces, gym / fitness studio and communal lounge and dining areas), wider enhancements to landscaping and the public realm and a long term Social Value Strategy for the benefit of the wider community.
- 6.24. On this basis, the proposed development fully accords with Local Plan Policy H4.

## Assessing Potential Impacts

### Design and Layout

- 6.25. The NPPF (2023) (paragraph 131) provides overarching design guidance and emphasises that, *‘the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.’* Paragraph 135 of the NPPF (2023) seeks to ensure that developments:
- a) *‘will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
  - b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
  - c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
  - d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
  - e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
  - f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.’*

- 6.26. The adopted Local Plan (2019) includes similar further design guidance under Policies CC7 (Design and the Public Realm) and CC8 (Safeguarding Amenity). 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 of Reading in which it is located.'* Policy CC7 adds that the various components of development form (layout, landscape, density and mix, scale and architectural details) will be assessed to ensure that development make a positive contribution in relation to character, continuity and enclosure, public realm, movement and permeability, legibility, adaptability and diversity. Policy CC8 seeks to ensure that development will not cause a detrimental impact on the living environment of existing or new residential properties.
- 6.27. The accompanying Design and Access Statement sets out the design rationale for delivering a high-quality development on the site, based on a detailed assessment of the characteristics of the site and surrounding area and consideration of pre-application advice and relevant planning policy requirements.
- 6.28. As illustrated on the Proposed Site Plan (ref. 08278-CJA-ZZ-ZZ-DR-A-0100) and the proposed Landscape Strategy, it is proposed that the building will comprise a continuous built form fronting Mill Lane, which is broken down into different elements based on the adjacent site context and character areas. The development is designed to mediate between larger-scale development to the north and lower-scale historic development to the south and east through the stepped form of the building, as noted further below. An active frontage is proposed along Mill Lane through the inclusion of active uses and the use of glazing, together with the retention and enhancement of boundary planting in order to enhance the quality of the public realm and contribute to the wider area.
- 6.29. Internally, the ground floor layout includes a clear defined pedestrian entrance into a large communal lobby (including a lounge, co-working and dining space, gym and cycle store) with access through to the residents' wellness garden and neighbourhood garden. The proposed residential units will be of high-quality design to the same standards of JLP's John Lewis and Waitrose stores.
- 6.30. The proposed development, as explained further in the accompanying Design and Access Statement, achieves a high quality and sustainable design, which is informed by and contributes to the character of the local area, in accordance with the provisions of the NPPF (2023) and Local Plan Policies CC7 and CC8.

## Density, Scale and Massing

- 6.31. The NPPF (2023) (paragraph 123) states that planning policies and decisions should *'promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.'* Paragraphs 129 and 135 of the NPPF (2023) further emphasise that development should optimise the use of land to meet identified housing needs, in particular town centres that are well served by public transport.
- 6.32. Similarly, Local Plan Policy CC6 is clear that, *'The scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations.'*
- 6.33. Local Plan Policy H2 adds that, *'The appropriate density of residential development will be informed by:*

# Planning Statement

Former John Lewis Depot, Letcombe Street, Reading (also known as JLP Mill Lane)

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- *the character and mix of uses of the area in which it is located, including the housing mix, and including consideration of any nearby heritage assets or important landscape or townscape areas;*
- *its current and future level of accessibility by walking, cycling and public transport;*
- *the need to achieve high quality design;*
- *the need to maximise the efficiency of land use; and*
- *the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.'*

- 6.34. Policy H2 refers to indicative densities for development set out in accompanying figure 4.5, which states 'above 100' dwellings per hectare for town centres. Supporting paragraph 4.48 is clear that *'the appropriate density may be significantly greater than this, in view of the need to make best use of accessible sites set out in policy CC6.'*
- 6.35. Policy CR10 relates to Tall Buildings which are identified as buildings of 12 storeys of residential use or more located within three identified areas in the borough. However, based on the site location and proposed scale of development and site location, Policy CR10 is not applicable to the current development proposals.
- 6.36. The proposed scale and massing of the development is illustrated on the Proposed Elevations (refs. 08278-CJA-ZZ-XX-DR-A-0701 to 08278-CJA-ZZ-XX-DR-A-0703). The height of the building ranges from predominantly 7 to 11 storeys (ground floor plus 6 to 10 storeys) across the three fingers of the development, stepping down to 5-6 storeys (ground floor plus 4 to 5 storeys) in the south-east of the site towards the courtyard garden areas and Conservation Area.
- 6.37. As explained in the accompanying Design and Access Statement, the scale and massing has been established based on detailed analysis of the existing context and key local viewpoints and detailed pre-application engagement with RBC and Design South East (DRP). The building mass is broken down into different elements based on the adjacent site context and character areas, with articulation of elevations through architectural details and massing reducing to the south in response to the Conservation Area. Street frontages have been enhanced through the introduction of high-quality landscaping and active frontage.
- 6.38. Based on the sustainable and accessible location of the site and the need to optimise the use of land to meet identified housing needs, the overall scale and density of the proposed development meets the provisions of the NPPF (2023) (paragraphs 123, 129 and 135) and Local Plan Policy CC6. The Design and Access Statement, together with accompanying technical reports, demonstrate that the density of development has been appropriately informed by the surrounding context and will minimise detrimental environmental impacts, in accordance with Policy H2.

## Heritage and Townscape

- 6.39. The adopted Local Plan (2019) includes a number of overarching policies relating to heritage and townscape, as summarised below, including: Policy CC7 (Design and the Public Realm), EN1 (Protection and Enhancement of the Historic Environment), EN3 (Enhancement of Conservation Areas), EN4 (Locally Important Heritage Assets), EN5 (Protection of Significant Views with Heritage Interest) and EN6 (New Development in a Historic Context).
- Policy CC7 – *‘All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.’* Various components of development form will be assessed to ensure that development makes a positive contribution to character, continuity and enclosure, public realm, movement and permeability, legibility, adaptability and diversity. Policy CC7 adds that, *‘Developments will also be assessed to ensure that they: - Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm...’*
  - Policy EN1 – *‘Historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced.’*
  - Policy EN3 – *‘The special interest, character and architecture of Conservation Areas will be conserved and enhanced.’* Policy EN3 also provides detailed guidance regarding the design of development proposals within Conservation Areas.
  - Policy EN4 – *‘Development proposals that affect locally important heritage assets will demonstrate that development conserves architectural, archaeological or historical significance which may include the appearance, character and setting of the asset.’*
  - Policy EN5 – *‘New development should not harm and where possible should make a positive contribution to views of acknowledged historical significance.’*
  - Policy EN6 – *‘In areas characterised by heritage assets, the historic environment will inform and shape new development. New development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development.’* Policy EN6 adds that the following factors will be taken into consideration when determining planning applications – existing historic townscape, sensitivity to historic context, reflection of borough heritage themes and access to any previously undiscovered or neglected historic significance.
- 6.40. The existing site allocation (Policy CR14g) also states that development should *‘enhance the setting of the Conservation Area’*, although the policy is focused primarily on development of the area north of the A329 and is not clear whether the specific requirements relate to all or part of the site allocation.
- 6.41. As set out above, the site is located outside, but adjacent to, the north and east of the Market Place and London Street Conservation Area and there are heritage assets in the surrounding area. Accordingly, a Heritage, Townscape and Visual Impact Assessment (HTVIA) has been undertaken to consider the proposed development in relation to its heritage, townscape and visual context.

- 6.42. As explained in the HTVIA, the proposed development has been designed to respond positively to local heritage assets and to the immediate and surrounding townscape context. The development is designed to mediate between the large-scale development to the north of the A329 and the low-scale historic development to the south and east through the stepped form of the building, with its massing concentrated along Mill Lane to the north and reducing to the south and east towards the Market Place and London Street Conservation Area,
- 6.43. The HTVIA identifies 141 designated heritage assets (Listed Buildings, Conservation Areas, Scheduled Monuments and Registered Parks and Gardens) within the identified 500m study area of the site. A zone of theoretical visibility (ZTV) was subsequently used to identify receptors where the proposed development may be visible and receptors that could be scoped out from assessment based on a lack of intervisibility. 15 representative views were selected to support the assessment of the proposed development on surrounding heritage assets, townscape and visual receptors.
- 6.44. Following assessment, the HTVIA concludes that the proposed development will have a neutral effect on the setting and significance of the majority of heritage assets within the identified study area. Indeed, heritage assets in close proximity to the proposed development (i.e. including the Conservation Area) are considered to benefit from the introduction of landscaping and active ground floor frontage, which will increase pedestrian movement and appreciation of heritage assets, thereby enhancing the setting of the Conservation Area, as required by Policy CR14g.
- 6.45. The assessment identifies a material effect on one designated heritage asset (Grade II listed Quaker Meeting House) based on an intensification of the urban character within its immediate setting. Less than substantial harm is identified to the setting of the listed building, which in accordance with paragraph 208 of the NPPF (2023) must be weighed in the balance with the wider public benefits to be realised by the development proposals. As set out below, there are a number of significant and wide-ranging benefits, including the provision of a mix of much-needed, high-quality and sustainable new homes to support local needs. The HTVIA concludes that the public benefits significantly outweigh the harm cause to the designated heritage asset in line with the provisions of paragraph 208 of the NPPF (2023), as well as Local Plan Policies EN1 and EN6.
- 6.46. The HTVIA categorises the existing townscape surrounding the site into five distinct areas and considers the character and appearance of each character area. The Historic Core character area is identified with 'High' townscape value, the Residential, Civic Centre and Town Centre character areas are identified with 'Medium' townscape value and the Large scale commercial / retail character area is identified with 'Low' townscape value. The townscape assessment concludes that, owing to the site location and the existing building, the proposed development would have moderate beneficial of minor beneficial likely effects on the townscape character areas, in turn meeting the provisions of Local Plan Policies EN1 and EN6.

- 6.47. In the context of visual amenity, taking into account the existing poor-quality building and the urban character of the local area, the HTVIA concludes the impacts to visual receptors will either maintain the quality of the existing visual amenity or result in effects which are wholly positive, including a moderate beneficial effect on users of the Quaker Meeting House. Overall, the HTVIA concludes that the proposed development is considered to form a positive contribution to the overall visual amenity and enjoyment of the local area, introducing high-quality, responsive architecture which is well-considered in relation to the surrounding visual sensitivities.
- 6.48. On the basis of the above, and the findings of the HTVIA, the proposed development accords with the relevant provisions of the NPPF (2023) and Local Plan Policies CC7, EN1, EN3, EN4, EN5, EN6 and CR14g.

### Archaeology

- 6.49. Local Plan Policy EN1 seeks to protect and enhance the historic environment, including sites and features of archaeological importance. Local Plan Policy EN2 requires applicants to assess the archaeological impacts of development and states that, *'Development proposals which will have an adverse effect on scheduled monuments and other nationally important archaeological remains and their settings will not be allowed unless there is clear and convincing justification in the form of overriding public benefits.'* The existing site allocation (Policy CR14g) also states that development should *'take account of potential archaeological significance'*, as referred to above.
- 6.50. As referred to above, the Site is located within a locally designated Area of Archaeological Potential, as shown on the adopted Local Plan (2019) Policies Map.
- 6.51. Accordingly, an Archaeological Desk-Based Assessment (DBA) has been undertaken which identifies and assesses the archaeological potential of the Site and the potential impacts of the proposed development.
- 6.52. As explained within the Archaeological DBA, accompanying this planning application, the Site and surrounding area have been subject to extensive previous archaeological work. In 1998/99, 47 small trenches were monitored on the Site and no significant archaeological features were noted. In 2007, land adjacent to the west of the Site was evaluated and similarly no significant archaeology was identified. The Archaeological DBA therefore concludes that based on the clear ground-tested evidence, the Site is considered to no longer have potential for archaeological heritage assets or deposits of archaeological interest.
- 6.53. Accordingly, based on the Archaeological DBA, the development proposals accord with Local Plan Policies EN1 and EN2 in relation to archaeology.

### Housing Mix

- 6.54. Local Plan Policy H4 requires Build to Rent schemes to provide for a mix of unit sizes in accordance with Policies H2 (Density and Mix) or CR6 (Living in Central Reading).

6.55. Local Plan Policy H2 refers to borough-wide requirements set out in the Berkshire Strategic Housing Market Assessment (SHMA) (2016) and encourages residential development to include a mix of housing, particularly family homes of three or more bedrooms.

6.56. Policy CR6 sets out specific requirements for Central Reading, in which the Site is located (as shown on the Local Plan Proposals Map (2019)), as follows:

*'All proposals for residential development within the central area will be required to contribute towards a mix of different sized units within the development. This will be measured by the number of bedrooms provided within individual units. Ideally, a mixture of one, two and three bedroom units should be provided. As a guide, in developments of 15 dwellings or more, a maximum of 40% of units should be 1-bed/ studios, and a minimum of 5% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable.'*

6.57. Paragraph 5.3.23 of the Local Plan, supporting Policy CR6, acknowledges that 'flats are likely to make up the vast majority of new housing development in the centre', and adds that, developments should not be dominated by one-bedroom units, and a minimum proportion of three or more bed-units will allow for a wider variety of people living in the centre.'

6.58. As set out in the submitted Accommodation Schedule, the proposed development includes the following mix of units (including rounded %):

- 1-bed 1-person – 20 units (9%)
- 1-bed 2-person – 81 units (38%)
- 1-bed 2-person (accessible) – 10 units (5%)
- 2-bed 3-person – 10 units (5%)
- 2-bed 4-person – 78 units (36%)
- 2-bed 4-person (accessible) – 4 units (2%)
- 3-bed 4-person – 6 units (3%)
- 3-bed 5-person – 6 units (3%)

6.59. As set out above, the proposed development includes 6% 3-bed units, in excess of the minimum requirement set out in Policy CR6 and in support of the overall need for family housing set out in Policy H2. Notably, the proposed development also includes a significant proportion of larger 2-bed units suitable for families of 4 people (82 units, comprising 38% of the total provision). In total almost half of the proposed units (49%) are family-sized (including two double-bedrooms and two en-suites), in line with the overall aims of Policies H4 and CR6.

- 6.60. It is acknowledged that the proportion of 1-beds exceeds the guidance set out in Policy CR6 – although notably Policy CR6 is clear that the maximum threshold is a ‘guide’ (as acknowledged during pre-application discussions) and that viability is also a consideration. In this regard, it is notable that the majority of 1-bed units are larger units suitable for 2 people (91 (82%) of the 111 1-bed units). Viability is also a particular consideration for the proposed development, and the submitted Viability Assessment (referred to further below) is clear that ‘there are significant market constraints that present challenges to the proposed development’ (paragraph 1.5).
- 6.61. On this basis and taking into account the proportion of 3-bed units proposed, it is considered that the overall proposed housing mix is justified and acceptable in accordance with Local Plan Policies H2 and CR6.

### Affordable Housing

- 6.62. The NPPF (2023) (paragraph 64) sets out expectations for affordable housing to be provided on site to meet identified needs unless an alternative approach is justified. Paragraph 66 of the NPPF (2023) states that major development should be expected to provide at least 10% affordable housing, subject to exemptions, including where the development provides Build to Rent homes.
- 6.63. Paragraph: 007 Reference ID: 10-007-20190509 of the PPG adds that, *‘It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.’*
- 6.64. Local Plan Policies H3 (Affordable Housing) and H4 (Build to Rent Schemes) set out the Council’s requirements relating to affordable housing provision.
- 6.65. Local Plan Policy H3 seeks 30% affordable housing provision on sites of 10 or more dwellings. Notably, Policy H3 is clear that, *‘where proposals fall short of the policy target as a result of viability considerations, an open-book approach will be taken and the onus will be on the developer/landowner to clearly demonstrate the circumstances justifying a lower affordable housing contribution.’* Policy H3 also adds that, in determining applications, the Council will assess the site size, suitability and type of units to be delivered.
- 6.66. Similarly, Policy H4 seeks 30% affordable housing in accordance with Policy H4 and any relevant SPD. The supporting text to Policy H4 (paragraph 4.4.32) however recognises that Build to Rent developments have different viability models and therefore flexibility regarding affordable housing is required:

*“It is accepted that as Build to Rent developments are dependent on long term rental income rather than early sales, their funding is inevitably long term, and operates to different viability models compared to for sale schemes. Government policy therefore sees a need for some flexibility, particularly in relation to affordable housing provision. Nevertheless, where such justification is being made, the Council will expect the viability appraisal to also provide information on the viability of the development as a for sale scheme.”*

- 6.67. The Affordable Housing SPD (2021) provides further details to supplement Local Plan Policies H3 and H4. Paragraph 4.18 confirms the expectation for Build to Rent developments to provide 30% affordable housing 'subject to viability considerations'. Paragraphs 4.18 to 4.19 state that affordable housing provision will be sought as Affordable Private Rent (APR), provided at 20% below local market rents, set in relation to Local Housing Allowance (LHA) levels.
- 6.68. JLP's aspiration is to deliver as many affordable homes as it can to support local needs and the council's priorities and will continue to work with the council to do so. However, the proposed development needs to be commercially viable and at present there are market constraints that present challenges to the proposed development. Accordingly, further to pre-application discussions and in line with the provisions of Policies H3 and H4, a Financial Viability Assessment (FVA) has been prepared by DS2 and accompanies this planning application. The FVA tests the maximum viable level of affordable housing that could be delivered as part of the proposed development, on an objective, non-applicant specific basis in accordance with professional guidance.
- 6.69. Following pre-application discussions, JLP has made a commercial decision to deliver 10% affordable housing, provided as Affordable Private Rent (APR) at rental levels set at Local Housing Allowance levels, in accordance with the Local Plan and Affordable Housing SPD (and based on an accompanying Viability Assessment and subject to discussions with the Council). The units will be built and fitted out to the same high standards and benefit from access to the communal residents' facilities and services as the market housing. The APR tenure and JLP's commitment to pepper potting homes provides a high level of flexibility to manage the number and rent levels of homes, should circumstances change.
- 6.70. The proposed development will also be subject to a review mechanism which will be secured via the Section 106 agreement. This will enable the Council to secure additional affordable housing and/or APR at a greater discount to market rent, should the proposed development economics increase when compared to the application stage viability scheme.
- 6.71. JLP will enter into discussions with the Council regarding how the homes will be allocated and who will be eligible to rent them. Full details will be included in the Section 106 Agreement.
- 6.72. JLP welcomes further discussions with the Council and its viability advisors during determination of the application.

## Highways

- 6.73. The NPPF (2023) (paragraph 108) requires that transport issues are considered so that:
- a) *'the potential impacts of development on transport networks can be addressed;*
  - b) *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
  - c) *opportunities to promote walking, cycling and public transport use are identified and pursued;*

- d) *the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) *patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.'*

- 6.74. Paragraph 115 of the NPPF (2023) states that, *'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'*
- 6.75. Paragraph 117 of the NPPF (2023) states that, *'All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.'*
- 6.76. A Transport Assessment (TA) and Framework Residential Travel Plan have been prepared by Glanville and accompany this planning application. The TA assesses the potential highways impacts of the proposed development and considers how the proposals will provide opportunities for walking, cycling and public transport use. The Travel Plan sets out further measures to encourage residents to travel by non-car modes.
- 6.77. As explained within the TA, the Site is in a highly sustainable location with direct access to walking and cycling links to a wide range of local amenities and key destinations. The Site also benefits from access to several bus routes to the town centre as well as to educational facilities and employment sites in the wider area. Reading railway station is located within a 12-minute walk to the north of the Site and provides frequent services to and from further employment destinations, including London. On this basis, a predominantly car-free development is proposed. The Travel Plan also includes a number of objectives for increasing usage of sustainable travel modes and minimising car use, including via site design, promotion and communication materials and promotion events.
- 6.78. The TA estimates that the proposed development will generate 1,369 person trips each day, of which only 7% would be by vehicles with the remaining 93% by sustainable modes (on foot, by bicycle, or by public transport). Accordingly, the TA concludes that the expected level of movements can be well-accommodated within the existing and surrounding transport network, and therefore the highway safety and transport impacts cannot be regarded as 'severe'.
- 6.79. On this basis, the proposed development accords with the NPPF and Local Plan Policies T1 and T3.

## Car and Cycle Parking

- 6.80. Local Plan Policy TR5 states that, *'Development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.'*

- 6.81. Similarly, the Revised Parking Standards and Design SPD (2011) includes parking standards for new development based on a zonal approach, on the principle that *'developments located close to public transport and local centres will require less parking than equivalent developments in less sustainable areas of the Borough'* (page 6). The Site is located within Zone 2 (Primary Core Area) adjacent to the boundary of Zone 1 (Central Core Area), as set out in the Revised Parking Standards and Design SPD (2011).
- 6.82. The car parking standards for a 'C3 Dwelling Flat' located in Zone 2 are a maximum of 1 car parking space per 1-2 bed flat and a maximum of 1.5 car parking spaces per 3+ bed flat, plus 1 visitor space per 10 dwellings. For all developments including up to 200 car parking spaces, 3 disabled spaces or 5% of total capacity are required.
- 6.83. The cycle parking standards for a 'C3 Dwelling Flat' are a minimum of 0.5 cycle parking spaces for 1-2 bed flats and a minimum of 1 cycle parking space for 3-bed flats. Based on the proposed housing mix (including 203 1-2 bed units and 12 3-bed units), there is a requirement for 114 cycle parking spaces.
- 6.84. The Revised Parking Standards and Design SPD (2011) also includes the following standards for Car Clubs:
- "For developments of more than 10 residential units in Zones 1 and 2, developers will be required to:*
- *Provide or support a car club on the site or demonstrate that the development will have access to and the use of a car club on a nearby site.*
  - *Create dedicated car parking spaces on the site for the car club."*
- 6.85. As set out above, and explained in the accompanying Transport Assessment, the Site is in a highly sustainable location and is highly accessible by non-car modes. The Site benefits from walking and cycling links to a wide range of local services and has immediate access to public transport links, including bus stops located approximately 100m from the Site and Reading railway station located approximately 850m from the Site. Accordingly, a predominantly car-free development is proposed, with the exception of 3 accessible car parking spaces and 4 car parking spaces along Crossland Road proposed for essential use by occupiers of affordable housing.
- 6.86. With regards to cycle parking, a communal cycle store is proposed at ground floor level which will accommodate the required 114 cycle parking spaces in the form of two-tier racks, in line with the parking standards set out in the Revised Parking Standards and Design SPD (2011). In addition, three Sheffield stands are proposed to be located adjacent to the main building entrance to serve the flexible commercial/community space.
- 6.87. A Car Club space is also proposed on Mill Lane to replace part of the existing pay and display bay. As explained in the Transport Assessment, this bay was only fully occupied one day in 2023 and therefore there is capacity available to accommodate a Car Club space without negatively impacting on local parking provision.
- 6.88. On the basis of the above, the proposed development accords with the requirements of Local Plan Policy TR5 and the Revised Parking Standards and Design SPD (2011).

## Energy and Sustainability

- 6.89. The adopted Local Plan (2019) includes a number of cross-cutting policies relating to energy and sustainability, including: Policy CC2 (Sustainable Design and Construction), CC3 (Adaptation to Climate Change), CC4 (Decentralised Energy), CC5 (Waste Minimisation and Storage) and H5 (Standards for New Housing). The Sustainable Design and Construction SPD (2019) also provides further guidance on the implementation of energy and sustainability policies set out in the adopted Local Plan.
- 6.90. An Energy Statement and Sustainability Statement have been prepared by Hoare Lea and accompany this planning application, considering relevant planning policies further and setting out how the proposed development addresses the relevant policy requirements.
- 6.91. Policy CC2 states that proposals for new development will be acceptable where, *'the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.'* Similarly, Policy CC3 requires developments to incorporate measures to adapt to climate change, including in relation to orientation, solar shading, thermal mass, heating and ventilation, green and brown roofs, use of trees and planting and surface water run-off.
- 6.92. As explained in the Sustainability Statement, passive design measures have been explored and the performance of the glazing has been carefully considered to maximise natural daylight penetration whilst allowing a controlled amount of passive solar heating. Additional trees, planting and brown roofs are also proposed as shown in the accompanying application drawings and Landscape Strategy. An overheating assessment, included within the Energy Statement, concludes that all dwellings achieve compliance with the required criteria.
- 6.93. Policy CC4 requires that any development of more than 20 dwellings considers the inclusion of decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision.
- 6.94. As explained in the Energy Statement, the feasibility of connecting to an existing district heating network has been reviewed, however no opportunities have been identified in the vicinity of the proposed development. On-site Combined Heat and Power (CHP) is also not proposed due to limited carbon reduction potential in light of recent grid decarbonisation and the adverse impact on air quality from flue emissions. Decentralised energy provision is therefore not considered to be feasible or viable.
- 6.95. Policy H5 sets out energy and sustainability standards for new housing including requirements for major new build housing to: be built to the higher water efficiency standard under Regulation 36(3) of the 2015 Building Regulations, and to be designed to achieve zero carbon homes. Paragraph 4.4.46 of the Local Plan (2019), supporting Policy H5, adds that where homes are not carbon neutral (a minimum 35% improvement over the 2013 Building Regulations), a carbon offsetting contribution will be required,

- 6.96. The Energy Strategy for the proposed development, as set out in the Energy Statement, has been developed using a 'fabric first' approach through the 'be lean', 'be clean', 'be green' energy hierarchy. In line with JLP standards, the proposed development is designed to operate utilising low and zero carbon technologies to heat and power the development.
- 6.97. Passive design and energy efficiency measures have been incorporated into the design of the proposed development, including highly insulated building fabric, airtight construction and highly efficient mechanical and electrical systems. The heating and cooling energy will be generated via an 'all electric / combustion-free' engineered solution utilising Exhaust Air Heat Pumps (EAHPs) serving each individual dwellings heating and hot water. In addition, the provision of solar photovoltaic (PV) panels will be provided on available roof space.
- 6.98. Overall, based on Building Regulations Part L 2021, the energy assessment concludes that the proposed development will result in a reduction in regulated CO2 emissions of 69% after incorporation of heat pumps and PV. A remaining offset payment requirement is identified to be agreed through a Section 106 agreement.
- 6.99. On the basis of the above and the accompanying Energy Statement and Sustainability Statement, the proposed development accords with Local Plan Policies CC2, CC3, CC4 and H5.

### Waste

- 6.100. Local Plan Policy CC5 states that *'Development should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate, well-designed space to facilitate waste storage, reuse, recycling and composting.'*
- 6.101. As explained in the accompanying Sustainability Statement, the proposed development will embed the principles of circular design and minimal material wastage, with 90% of construction waste diverted from landfill, in accordance with the provisions of Local Plan Policy CC5.
- 6.102. A Construction Management Plan (CM) and Operational Waste Management Strategy (OWMS) have also been prepared and accompany this planning application. The CMS sets out provisions for the management of waste during construction of the proposed development. The OWMS sets out a number of guiding principles to ensure that waste arising from the proposed development is managed in a sustainable manner with minimal impact on the environment.
- 6.103. As explained in the OWMS, JLP is committed to operating a high quality waste management service for its residents throughout the life of the development. The proposed development includes space assigned for waste management in back-of-house areas which aligns with and exceeds RBC guidance. Refuse collection locations have been refined and optimised to enable efficient collection operation by RBC collection crews. The proposed approach for the management of residential and commercial waste is fully set out at sections 7 and 8 of the OWMS.

- 6.104. The OWM states that the design proposals and the OWMS itself demonstrate compliance in addressing Local Plan Policy CC5 through a well-designed space to facilitate sustainable waste management during the use of the development.

### Arboriculture

- 6.105. Local Plan Policy EN14 seeks to ensure that important trees, hedges and woodlands will be protected from damage or removal. Policy EN14 adds that, *'New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.'*
- 6.106. An Arboricultural Impact Assessment (AIA) has been prepared by AECOM and accompanies this planning application. The AIA is based on a tree constraints plan (AIA Appendix A) and tree survey (AIA Appendix B) and identifies the likely direct and indirect impacts of the proposed development.
- 6.107. The AIA explains that the proposed development will require the removal of ten trees and four hedges / groups of shrubs, including nine trees classed as moderate quality (Category B) and one tree and hedges / groups of shrubs classified as low quality (Category C). The AIA explains that, based on the low / moderate quality, the one-sided growth and low shade tolerance, it will be of greater long-term benefit if the trees and shrubs are removed to enable a full and cohesive landscaping scheme for the Site. The proposed development includes tree removal on Reading Borough Council owned land which has been subject to pre-application discussions and will be subject to formal approval.
- 6.108. The proposed loss of trees will be mitigated with a high-quality scheme of new tree planting and associated landscaping works. It is proposed that 49 new trees will be planted, as shown on the accompanying submitted landscape plans, comprising an increase to the number and diversity of tree species to provide wider biodiversity and amenity benefits.
- 6.109. On the basis of the above, the proposed development accords with the provisions of Local Plan Policy EN14.

### Ecology

- 6.110. The NPPF (2023) (paragraphs 185) sets out aims to protect and enhance biodiversity by avoiding significant harm from new development and providing net gains for biodiversity.

- 6.111. Local Plan (2019) Policy EN12 states that development should: *‘Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable’ and ‘Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.’* Policy EN12 adds that *‘development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible.’*
- 6.112. More recently, the Environment Act 2021 mandates a minimum of 10% biodiversity net gain (BNG) for the majority of new developments, which came into force in February 2024.
- 6.113. A Preliminary Ecological Appraisal Report (PEAR) has been prepared by AECOM, based on a desk study and walkover survey of the Site, and accompanies this planning application. The PEAR includes a summary of baseline conditions, potential ecological constraints, requirements for mitigation, requirements for more detailed surveys and opportunities for biodiversity enhancements. Based on the PEAR, a Biodiversity Net Gain (BNG) Assessment has been undertaken and also accompanies this planning application, quantifying the overall effect of the proposed development on the Site’s biodiversity value. A submitted Landscape and Ecology Management Plan (LEMP) informs the managements of the proposed ecology enhancements for the Site.
- 6.114. As explained in the PEAR, there are no sites with an international designation for their biodiversity significance within 10km of the Site and no sites with a statutory designation for biodiversity within 1km of the Site. The nearest non-statutory designated site is Holy Brook local wildlife site (LWS) which is located 470m to the south-west of the Site. However, the PEAR explains that there is no potential for direct impacts from the proposed development on the Holy Brook LWS due to the distances and intervening roads and built-up areas.
- 6.115. The PEAR concludes that the existing building has no potential to support roosting bats. Whilst three existing trees along the Site boundary are covered by dense ivy which could be suitable for roosting bats, due to the location of the trees along Mill Lane / A329, there is considered to be negligible suitability. The PEAR thereby recommends precautionary mitigation measures based on the very low risk of disturbing bats during tree removal works. The PEAR identifies that habitats on site are suitable for nesting birds and therefore recommends site clearance to occur outside the nesting bird season. In addition, a Construction Environmental Management Plan is proposed to include standard measures to address the potential risks of indirect impacts on bats outside the Site.
- 6.116. A number of biodiversity enhancements are proposed as part of the development proposals, as set out in the PEAR, including diverse planting and brown roofs, bird boxes, bat boxes and insect refugia. On this basis, the BNG Assessment concludes that the proposed development will result in a net gain of 0.82 habitat units (+272.10%) and 0.16 hedgerow units. The proposed development will thereby provide significant BNG far in excess of the minimum Environment Act requirements.

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6.117. The accompanying LEMP sets out specific objectives, actions and targets for management of the proposed biodiversity enhancements, including in relation to the creation and management of an extensive biodiverse brown roof, planting of trees, hedgerows and planting beds, and installation and maintenance of bat, bird and insect boxes. The LEMP explains that the measures will support both the national and local Biodiversity Action Plan.

6.118. On this basis, the proposed development will protect and enhance biodiversity in accordance with Local Plan Policy EN12.

### Ground conditions

6.119. Paragraph 189 of the NPPF (2023) seeks to ensure that sites are suitable for proposed uses taking account of ground conditions and any risks arising from land instability and contamination.

6.120. Local Plan Policy EN16 states that development should not be damaging to the environment and sensitive receptors through land pollution. Policy EN16 adds that, *'Development will only be permitted on land affected by contamination where it is demonstrated that the contamination and land gas can be satisfactorily managed or remediated so that it is suitable for the proposed end use and will not impact on the groundwater environment, human health, buildings and the wider environment.'* The existing site allocation (Policy CR14g) also states that development should *'address any contamination on site'*, as referred to above.

6.121. An Environmental Site Assessment report accompanies this application and presents the findings and conclusions of a Phase 1 and Phase 2 environmental site assessment.

6.122. In relation to contamination, the Phase 1 assessment identified no significant sources of ground contamination from the current site use, though referred to the potential for contamination based on previous site uses. The subsequent Phase 2 assessment identified one asbestos sample and petroleum hydrocarbons exceeding relevant thresholds and thereby suggested some further assessment. However, the assessment did not identify any soil or groundwater contamination which could pose a risk to the proposed development. No significant levels of hazardous gases were identified and thus no requirement for special protection measures, subject to further monitoring to confirm this classification.

6.123. In relation to geotechnical conditions, the Phase 2 assessment states that the chalk base is viable for a piling solution, with recommendations made to consider the groundwater levels for future foundation designs.

6.124. Overall the Phase I and II Environmental Site Assessment concludes that contamination is expected to be manageable and the site is suitable for proposed residential development, subject to actions including further assessment of petroleum hydrocarbon and asbestos contamination after demolition, further gas monitoring and a foundation works risk assessment.

6.125. On this basis, the proposed development accords with the provisions of Local Plan Policies EN16 and CR14g.

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## Flood risk

- 6.126. The NPPF (2023) (paragraph 165) sets out an overarching aim that, *'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).'*
- 6.127. This is reflected in Local Plan Policy EN18, which states that, *'Development will be directed to areas at lowest risk of flooding in the first instance, following the Sequential and Exceptions Test set out in the NPPF, and taking into account the effects of climate change. It will consider flooding from all sources, including fluvial, surface water, groundwater and sewer flooding.'* Policy CR14g also requires that development of the overall site allocation addresses flood risk issues, as referred to above.
- 6.128. A Flood Risk Assessment (FRA) and Drainage Strategy has been prepared by Fairhurst and accompanies this planning application. The FRA considers the overall risk of flooding, the impacts of the proposed development and considers any mitigation measures required.
- 6.129. As explained in the FRA, the Site is located entirely within Flood Zone 1 and therefore has a very low annual probability of river flooding of less than 0.1%.
- 6.130. Based on the Environment Agency's (EA) Flood Map for Planning, a small area of the Site to the north of the existing building has a low to medium risk from surface water. However, as explained in the FRA, the footprint of the proposed building will extend along the northern Site boundary and therefore remove any flow and flood risk to the development.
- 6.131. The Phase I and II Environmental Site Assessment report which accompanies this application, states that groundwater was found at 2.7-3.36m below ground level and recommends further consideration for future foundation designs. Notably, the Site is not located in a designated groundwater source protection zone.
- 6.132. Notwithstanding the above, based on the FRA, flood resistance measures relating to finished floor levels will be incorporated into the development to ensure lifetime safety to the development.
- 6.133. Based on the above, the Site has a low risk of flooding and is appropriate for the proposed development in accordance with the provisions of Local Plan Policies EN18 and CR14g.

## Drainage

- 6.134. Paragraph 175 of the NPPF (2023) states that, *'Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.'* Similarly, Local Plan Policy EN18 adds that all major developments should incorporate sustainable drainage systems (SuDS) as appropriate and in line with Government standards. Policy EN18 adds that run-off rates should be no greater than the existing conditions of the site and aim to reflect greenfield conditions.

- 6.135. The proposed surface water and foul drainage strategy is set out within the FRA and Drainage Strategy which accompanies this planning application. Section 8 of the FRA and Drainage Strategy explains the SuDS components which have been considered and proposed as part of the design of the proposed development with relevant justification. On this basis, the proposed surface water drainage strategy incorporates SuDS through the provision of permeable paving and landscaped courtyard gardens. Siphonic drainage from the roofs and two cellular storage tanks beneath the courtyard areas are also proposed.
- 6.136. As explained in the FRA and Drainage Strategy, based a pre-planning enquiry, Thames Water has confirmed that the surface water discharge rate should be restricted to 2 l/s. Accordingly, the proposed discharge rate is 2 l/s, based on a discharge rate of 0.5 l/s for the network south of the site and a discharge rate of 1.5 l/s for the network north of the site.
- 6.137. It is proposed that foul water will also be discharged into the existing Thames Water network to manholes north and south of the Site.
- 6.138. As set out above, based on the inclusion of SuDS and the proposed run-off rate, the proposals accord with Local Plan Policy EN18.

### Noise

- 6.139. Policy EN17 of the adopted Local Plan (2019) relates to noise generating equipment and states that: *"Where noise generating equipment is proposed, the noise source specific level (plant noise level) should be at least 10dBA below the existing background level as measured at the nearest noise sensitive receptor."*
- 6.140. Paragraph 185 of the NPPF (2023) outlines that planning policies and decisions should ensure that new development is appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution and including noise pollution.
- 6.141. Hoare Lea has undertaken a Noise Impact Assessment (NIA) to accompany the planning application. The assessment has concluded that noise associated with the proposed development can be controlled to appropriate levels. It explains that noise from the proposed building services plant, with the incorporation of appropriate noise control measures (such as acoustic enclosures), can be controlled to achieve environmental noise limits defined in line with Policy EN17 during the day and a 'low impact' in accordance with BS 4142 at night.
- 6.142. External noise can be controlled to suitable internal sound levels within the apartments with relatively conventional façade constructions and commercially available double glazed window systems. The proposals include a mechanical ventilation and heat recovery unit (MVHR) with an integrated cooling coil to provide both ventilation and heat relief – whilst it will be physically possible to open windows, it is not necessary to open them for thermal comfort.
- 6.143. Whilst external noise levels within private balconies will be higher than desirable, quieter communal amenity spaces are provided for use by residents.

- 6.144. On the basis of this assessment, and through the use of relatively conventional mitigation, noise can be controlled to suitable levels in line with Local Plan Policy EN17 and British Standard BS 4142.

## Air Quality

- 6.145. Policy EN15 of the Local Plan (2019) states that any development, by itself or cumulatively with other development, which detrimentally affects air quality will not be permitted unless the effect is mitigated. Whether the development is located within an Air Quality Management Area and whether it can be demonstrated that an overall improvement in air quality (e.g. through a reduction in the need to travel) would result from a development, would be taken into account in the decision making process. Further, Policy EN15 requires that where a development would introduce sensitive uses (such as residential) into, or intensify such uses within, an Air Quality Management Area, detrimental effects on that use will be mitigated, and such mitigation measures should be detailed in any planning application.
- 6.146. The application Site is located within an Air Quality Management Area (AQMA) which covers the entirety of Central Reading and was declared in 2009 for exceedances of the annual mean NO<sub>2</sub> AQO. The AQMA is described as: *“An area covering Reading Town Centre, areas along the major radial road routes into Reading (including J11 of the M4) and along the railway lines where they pass through built-up areas.”*
- 6.147. Consequently, RBC published an Air Quality Action Plan (AQAP) in 2023 in order to improve air quality conditions in Reading. The AQAP identifies the main sources of air pollution to be transport emissions on busy roads and building emissions from commercial operations and domestic heating.
- 6.148. Paragraph 192 of the NPPF (2023) maintains that planning decisions should comply with relevant national objectives for pollutants taking into account the presence of AQMAs and the cumulative impacts from individual sites in local areas. Furthermore, *“Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement”* and *“planning decisions should ensure that any new development in Air Quality Management Areas ...is consistent with the local air quality action plan.”*
- 6.149. An Air Quality Assessment has been prepared by Hoare Lea and accompanies the planning application. It assesses the potential air quality impacts associated with the construction and operation of the proposed development. It demonstrates that:
- monitoring data and Defra predicted background concentrations show that there have been no exceedances of the relevant Air Quality Objectives (AQOs) in the vicinity of the Application Site in 2022, the latest year of representative monitoring data available;
  - Through good practice and implementation of appropriate mitigation measures (included within a dust management plan), it is expected that the release of dust during construction would be effectively controlled and mitigated, with resulting impacts considered to be ‘not significant’. All dust impacts are considered to be temporary and short-term in nature;

- The results of the operational phase traffic screening assessment indicated that there will be a net decrease in traffic flows as a result of the proposed development being car free. The impact of the operational road traffic is therefore considered to be not significant;
- As no combustion sources are proposed for the primary energy supply (i.e. the proposed energy strategy is all electric during operation), no local air quality impacts are anticipated; and
- Based on a qualitative site suitability assessment for residential use, there will be no likely exceedances of relevant AQOs for all pollutants at the proposed development and therefore additional mitigation is not required.

6.150. Consequently, from an air quality perspective, the proposed development is acceptable when assessing exposure to representative sensitive receptors based on the assessment methodologies and with national and local planning policy. In this context, the proposals accord with Policy EN15 of the adopted Local Plan.

## Daylight and Sunlight

6.151. Local Plan Policy CC7 states that all development must be of high quality design based on layout, landscape, density and mix, scale and architectural details.

6.152. Policy CC8 states that, *'Development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of...Access to sunlight and daylight...'*. Paragraph 5.3.49 of the Local Plan refers to the Building Research Establishment (BRE) guidelines on assessing daylight and sunlight effects of development, *'which the Council will apply flexibly given the high density of the central area.'*

6.153. Accordingly, a Daylight and Sunlight Assessment has been prepared by GIA and accompanies this planning application. The Daylight and Sunlight Assessment includes an assessment of the potential effects of the proposed development on the amenity of relevant neighbouring receptors, undertaken in accordance with BRE Guidelines (2022).

6.154. The results of the technical assessments, as set out in the accompanying Daylight and Sunlight Assessment, conclude that the proposed development is over 99% compliant with regards to sunlight impacts. Whilst some nearby windows will experience alterations in relation to daylight, the Assessment explains that in the vast majority of cases these are small changes, relate to less sensitive properties or retain levels agreed elsewhere. Overall, the Assessment concludes that the daylight and sunlight effects of the proposed development will not be detrimental to neighbouring occupants.

6.155. On this basis, the proposed development accords with Local Plan Policies CC7 and CC8.

## External lighting

- 6.156. RBC Local Plan Policy EN16 (Pollution and Water Resources) states that development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution. It seeks to ensure that *"proposals for development that are sensitive to the effects of noise or light pollution will only be permitted in areas where they will not be subject to high levels of such pollution, unless adequate mitigation measures are provided to minimise the impact of such pollution."*
- 6.157. Local Plan Policy CC8 (Safeguarding Amenity) aims to ensure that development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties in terms of, inter alia, artificial lighting.
- 6.158. In relation to the provision of open space, Policy EN9 states that *"...new open space should create a safe environment, appropriately considering lighting and layout to reduce the fear of crime"*.
- 6.159. The NPPF (2023) (paragraph 191) states that:
- "Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:...*
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation."*
- 6.160. Hoare Lea has prepared an external Lighting Impact Assessment (LIA), which accompanies the application. It contains three parts: Baseline Lighting Survey; External Lighting Design (which demonstrates the proposed technical and aesthetic lighting design strategy in accordance with appropriate guidance; and an Illumination Impact Profile which presents quantitative information regarding pre and post development illuminance (lux) and luminance (glare) effects for residential locations.
- 6.161. The external lighting design of the proposed development comprises wall mounted luminaires, recessed downlights within colonnades, handrail lighting, in-ground uplights, column mounted luminaires, bollard lighting, tree uplighting and bench integrated lighting.
- 6.162. The LIA demonstrates that the modelled lighting strategy for the proposed development will provide appropriate levels of lighting for safe access, egress and usage of the Site. The modelled calculations also demonstrate that full compliance with Institute of Lighting Professional guidelines for impact to residential receptors, can be achieved. Within this context the development proposals accord with Policies EN16, CC8 and EN9 of the adopted Local Plan.

## Wind and Microclimate

- 6.163. Local Plan Policy CC8 states that, *'Development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of: ...Wind, where the proposals involve new development of more than 8 storeys.'*
- 6.164. As shown on the accompanying planning application drawings, the proposals include development of more than 8 storeys (10 and 11 storeys) in the western part of Site. Accordingly, a Wind and Microclimate Assessment has been undertaken and accompanies this planning application.
- 6.165. The Wind and Microclimate Assessment explains that the Site has suitable conditions for the proposed development. Following the proposed development, wind conditions at ground level are assessed as broadly remaining the same as the current baseline position. With the inclusion of 1.5m high balustrades along the five uppermost balconies in the south-west corner, the Assessment concludes that conditions would be suitable and safe for occupant use.
- 6.166. On this basis, the proposed development accords with Local Plan Policy CC8 in relation to wind and microclimate.

## Utilities

- 6.167. Local Plan Policy CC9 requires that development proposals provide for the infrastructure, services, resources, amenities or other assets impacted upon or made necessary by the development.
- 6.168. A Utilities Statement has been prepared by Hoare Lea and accompanies this planning application, which details the utility requirements of the proposed development and the engagement undertaken to date with local utility providers.
- 6.169. Based on the Site location, there is a local network of utility infrastructure with scope to accommodate the proposed development. As referred to in the Utilities Statement, Thames Water has confirmed that sufficient capacity exists in its clean water network to serve the first 50 properties proposed, with additional modelling to be undertaken to confirm any reinforcements required to the network to support the entire development. Separately, an application was submitted to Scottish and Southern Electricity (SSE) for the new electrical connections required for the development (1.3MVA). SSE has confirmed that the current local infrastructure has capacity for 1MVA to accommodate the development with the remaining 300kVA required to also be made available. A separate application has also been made for telecommunications services to the proposed development.
- 6.170. It is thereby considered that the development proposals will be supported by the necessary utility infrastructure and services, in accordance with the provisions of Local Plan Policy CC9.

## Benefits of the Proposed Development

- 6.171. The benefits of the proposed development are considered to be wide-ranging and significant, supporting and delivering the overall objectives of the adopted Local Plan (2019) and emerging LPPU. These are explained below.

### Housing provision

- 6.172. The proposals comprise the redevelopment of an underdeveloped sustainable town centre site to provide much-needed housing in Reading. The proposals will thereby fully support national objectives, of “*significantly boosting the supply of homes*” through the redevelopment of sustainable brownfield land (as set out in the NPPF (2023)), as well as the identified ‘pressing need’ for housing in Reading and the ‘heavy reliance on previously developed land’ for the delivery of new housing (as set out in the adopted Local Plan (2019)).
- 6.173. The proposed development seeks to provide 215 thoughtfully designed, high quality, community integrated new rental homes at a sustainable location in Central Reading, therefore providing significant public benefits in full accordance with the aims and needs identified in national and local planning policy.

### Affordable housing

- 6.174. The proposals seek to maximise the provision of tenure-blind affordable homes for local people, including key workers and others on local incomes, in order to help address the shortage of high-quality accommodation for local people. The units will be provided as Affordable Private Rent and will be built and fitted out to the same standards as the market rent homes and to enable access to the same facilities, amenities and services. Taking into account financial viability, JLP are committed to delivering as many affordable homes as possible, thereby contributing to the borough’s current need for affordable housing and delivering public benefits for the local community.

### Mix of housing to support local needs

- 6.175. The proposals comprise a mix of 1, 2 and 3-bedroom homes, including a high proportion of family homes in excess of planning policy requirements to support identified local needs. 6% (12 units) will be provided as 3-bedroom homes suitable for families 4 or 5 people and around half of the units (49% (104 units)) will accommodate families of 3 or more people. Based on the local needs set out in the adopted Local Plan (2019) and SHMA (2016) and recent delivery, the provision of a high proportion of family homes will provide a further important public benefit for the local community.

### High-quality accommodation

- 6.176. The proposed homes will be owned and managed by JLP and will all be fitted out with high quality John Lewis furniture, ensuring a high standard of living for residents and thereby supporting improvements to the character and appearance of the local area.

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- 6.177. Longer tenancies will be provided enabling residents to put down roots and to establish a sustainable long-term community. A 24/7 on-site management team will operate to look after residents and further curate a community as part of the wider area.
- 6.178. A 4-star HQM rating is being targeted to create homes and spaces with high levels of performance for sustainability and to benefit the quality of life for residents.

### Residents' facilities

- 6.179. Alongside the provision of much-needed housing, the proposals include the provision of a range of residents' facilities including flexible work from home spaces, gym / fitness studio and communal lounge and dining areas. The proposals thereby support sustainable living in a high quality environment to benefit local residents and curate a long-term healthy community. Provision of commercial / community space
- 6.180. The proposed development includes the provision of a flexible commercial / community space on the ground floor to accommodate and support the needs of local businesses and groups. The commercial / community space therefore provides an important public benefit for the local community.

### Low-carbon development

- 6.181. The proposals meet high sustainability targets and comprise the creation of a low carbon development, utilising low and zero carbon technologies and incorporating passive design and energy efficiency measures, to support the borough's overarching sustainability ambitions. The proposed measures include highly-insulated building fabric, airtight construction, highly-efficient mechanical and electrical systems, heat pumps, solar PV panels and mechanical ventilation with heat recovery.

### Supporting sustainable travel

- 6.182. The proposed will provide improved links around the Site to enhance accessibility and safety for pedestrians and cyclists to and from the Site and connecting with the town centre. This will provide benefits to both local residents of the development as well as the surrounding local community and residential area south of the Site.
- 6.183. Further, the proposals support sustainable travel opportunities including through provision of cycle parking facilities and Car Club provision, in line with the Council's wider sustainability ambitions.

### Provision of new external amenity areas

- 6.184. New public and private landscaped spaces will be provided with increased tree planting, accessible play areas and public realm improvements. This will enhance the quality of the residential environment for local residents as well as providing for residents within the local area, thereby benefitting the wider local community.

- 6.185. The neighbourhood garden is proposed to serve the local community and will provide a space for a number of different uses, including a family nook, quiet corner, natural play, social space, growing space, mound and copse and co-working terrace. This will support the local community where green space is lacking and facilitate the integration of the new and existing communities. The wellness garden will focus on the wellbeing of residents of the new development and will provide a series of spaces including a lounge terrace, orchard, celebration kitchen terrace, shade garden, wellness terrace and quiet corner.

### Significant biodiversity enhancements

- 6.186. National legislation, set out in the Environment Act 2021, mandates a requirement for a 10% increase in biodiversity value after development has taken place, when compared to the level of biodiversity after development has taken place. The proposals will deliver significant biodiversity enhancements and provide a very significant Biodiversity Net Gain of 272%, far in excess of the mandatory 10% requirement, through the introduction of ecological diversity and wildlife habitats. The biodiversity enhancements proposed will help to support local wildlife whilst further improving the character and appearance of the Site and thereby delivering an important public benefit.

### Social benefits

- 6.187. JLP is committed to supporting and assisting the local community, groups and organisations through a long term Social Value programme. The submitted Social Value Strategy outlines how JLP will create social value through:
- Health and wellbeing – e.g. supporting local organisations through volunteering, item donation, sponsored volunteer days, healthy eating workshops, artwork competitions, sustainable travel workshops and funding monthly bike surgeries.
  - Education and training opportunities – e.g. running careers workshops and showcasing construction careers, and providing on-site and practical learning opportunities for University students and local school pupils.
  - Culture and community – e.g. running a hoarding art competition and working with local charities to provide healthy food donations, host cafes and provide volunteer time.
- 6.188. JLP has and is continuing to engage with a wide variety of local groups, as explained further within the submitted SCI and Social Value Strategy, in order to ensure that the proposed development provides a sustainable long-term public benefit to the local community.

## Economic benefits

- 6.189. As set out in the submitted Economic Benefits Assessment, the construction of the proposed development is estimated to lead to the creation of up to 120 full-time equivalent (FTE) gross direct construction jobs per annum, with training and apprenticeship opportunities. Taking into account the displacement, leakage and multiplier rates, the construction phase is anticipated to generate up to 60 net additional FTE jobs for residents of the local area. There will be positive knock-on impacts with operatives generally using local shops and cafes, bringing in additional income to the area.
- 6.190. Once constructed, it is estimated that the development will create around 75 net additional on and off-site jobs for residents of the local area..
- 6.191. It is predicted that occupiers of the development will generate up to £2m of new household spend per year, supporting local goods and services in the borough and ensuring the vitality of local services and facilities in the town centre and local area.
- 6.192. In addition, the proposed development will deliver a range of public sector revenues through additional Council Tax revenue, Business Rates, New Homes Bonus and Community Infrastructure Levy (CIL). The submitted Economics Benefits Assessment estimates that the proposed development will provide around £400,000 net additional Council Tax revenue per annum, around £3m in CIL and £900,000 New Homes Bonus for RBC. The cumulative income to local government over 20 years is estimated to be around £8.1 million net present value.

## **Overall Planning Balance**

- 6.193. This application is for redevelopment of the Site and erection of up to 215 build to rent residential dwellings, together with flexible commercial / community space, residents' facilities, landscaping, public realm, amenity space, cycle parking and disabled car parking.
- 6.194. The design of the development has been informed by a suite of technical information, including assessments relating to: arboriculture, air quality, daylight / sunlight, ecology, energy, lighting, fire, flood risk and drainage, heritage and townscape, landscape, noise, waste, highways, utilities and wind and microclimate.
- 6.195. There are considered to be wide-ranging and significant benefits of the proposed development, supporting and delivering the overall objectives of the adopted Local Plan (2019) and emerging LPPU.
- 6.196. On this basis and for the reasons set out in this and the accompanying reports, there are no technical or environmental impacts that would significantly or demonstrably outweigh the substantial benefits of the proposal.

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6.197. Paragraph 11 of the NPPF (2023) confirms that development which accords with an up-to-date Development Plan should be approved without delay unless material considerations indicate otherwise. In this instance, based on the provisions of national and local planning guidance, relevant material considerations and the findings of technical assessments, the planning balance falls in support of granting planning permission.

## 7. Planning Obligations

### Introduction

- 7.1. In accordance with the NPPF (2023) and adopted Local Plan (2019), JLP intends to enter into dialogue with the Council to agree a list of planning conditions and obligations in relation to necessary infrastructure provision arising from the proposed development.
- 7.2. The agreed planning conditions will be required to meet the tests of paragraph 55 of the NPPF (2023) and the agreed planning obligations will need to meet the requirements of Regulation 122(2) of the CIL Regulations 2010 (as amended), being necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development.

### Section 106 Heads of Terms

- 7.3. Site-specific infrastructure requirements will be secured via a S106 agreement in line with the Planning Obligations for Infrastructure SPD (2015). In this regard, it is anticipated that a S106 agreement will be entered into to secure planning obligations based on the following Heads of Terms:
- Affordable housing provision (subject to viability discussions);
  - Public open space provision;
  - Biodiversity Net Gain;
  - Highways works;
  - Education;
  - Public realm improvements;
  - Zero carbon offsetting;
  - Employment Skills Plan – construction and end-user phase;
  - Public art; and
  - Community space.

- 7.4. The Applicant will enter into further discussions with the Council as appropriate to establish the need for planning obligations to be secured via a S106 agreement.

### Section 278 Agreement

- 7.5. The proposed development includes proposed work on public highways, including in relation to the existing Site access, parking bays and street lighting. It is therefore anticipated that a S278 agreement will be entered into with the Highways Authority to secure the carrying out of these works.

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## CIL

- 7.6. It is acknowledged that the adopted CIL Charging Schedule (2015) applies a CIL rate of £120/sqm (excluding indexation) for residential development at the Site in order to fund local infrastructure. The necessary calculation of CIL will be made upon determination of the application.

## 8. Conclusion

- 8.1. This Planning Statement supports a full planning application submitted to Reading Borough Council on behalf of JLP. The application is for the development of a new building for up to 215 build to rent residential dwellings (Use Class C3) at the former John Lewis Depot, Letcombe Street, Reading.
- 8.2. As this Statement explains, the Site is a sustainable brownfield site which is identified as a potential allocation for Build to Rent development in the emerging LPPU. This planning application seeks to facilitate the delivery of Build to Rent development at the Site and help to support the delivery of housing to meet local needs. The proposed development would also support the Government's housing and economic development objectives, helping to meet the aims and objectives and deliver planning benefits across all three strands of sustainable development (economic, social and environmental).
- 8.3. The clear benefits of the proposal include:
- Redevelopment of an underdeveloped sustainable town centre site providing much-needed housing in Reading;
  - 215 thoughtfully designed, high quality, community integrated new rental homes for Reading;
  - Homes owned and managed by the John Lewis Partnership, with the care and quality synonymous with JLP, ensuring a high standard of living for residents;
  - All homes will be fitted out with high quality John Lewis furniture;
  - A mix of homes, including a high proportion of family homes;
  - Provision of a range of residents' facilities including flexible work from home spaces, gym / fitness studio and communal lounge and dining areas;
  - Maximising tenure-blind affordable homes for local people, including key workers, pepper-potted throughout the development, built and fitted out to the same standards as the market rent homes and enjoying access to the same facilities, amenities and services.
  - Longer tenancies promoting a sustainable long-term community, enabling residents to put down roots;
  - 24/7 on-site management team, looking after residents and curating communities;
  - Provision of a flexible commercial / community space to support local businesses and groups;

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- Creation of a low carbon development with a target 4-star Home Quality Mark rating;
- Improved links around the Site to enhance accessibility and safety for pedestrians and cyclists;
- Supporting sustainable travel opportunities including through provision of cycle parking facilities and Car Club provision;
- New public and private landscaped spaces with increased tree planting, accessible play areas and public realm improvements;
- Delivery of significant Biodiversity Net Gain (272%) in excess of 10% requirement, ensuring the introduction of ecological diversity and wildlife habitats;
- Support and assistance for the local community, groups and organisations in the form of a long term Social Value programme;;
- Creation of up to 120 gross direct construction jobs per annum, with training and apprenticeship opportunities;
- Creation of around 75 net additional operation phase jobs for local residents;
- Up to £2m of new household spend generated per year, supporting local goods and services in the borough;
- Public sector revenues through additional Council Tax revenue, Business Rates, New Homes Bonus and Community Infrastructure Levy.

8.4. The planning application is supported by a suite of technical information which demonstrate the acceptability of the proposed development, allowing RBC to make a considered and informed decision. As Section 6 explains, there are no technical or environmental impacts that would significantly or demonstrably outweigh the substantial benefits of the proposal. As such, the development proposal clearly represents 'sustainable development' and in accordance with paragraph 11 of the NPPF (2023) and Section 38 (6) of the Planning and Compulsory Purchase Act 2004, it is respectfully requested that the planning application is approved without delay.

8.5. John Lewis Partnership BTR Ltd is committed to continuing discussions with the council and the community in the delivery of these much-needed new rental homes for Reading.

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