



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

PLANNING STATEMENT ADDENDUM

JULY 2025

savills

Planning Statement – Addendum

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



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Executive Summary

- I. This Planning Statement Addendum has been prepared by Savills on behalf of John Lewis Partnership BTR Ltd (JLP) ('the Applicant') in support of a current live planning application (ref. PL/24/1155) at the former John Lewis Depot, Letcombe Street, Reading ('the Site'), which is currently subject to determination by Reading Borough Council ('RBC').
- II. This Addendum should be read in conjunction with the submitted Planning Statement (August 2024), but for the avoidance of doubt, where there are any inconsistencies and/or variations between this Addendum and the submitted Planning Statement, the information in this Addendum shall be deemed to supersede that in the Planning Statement for the purposes of determination.
- III. In response to ongoing discussions between JLP and the Council during the determination of the current live planning application, the design of the proposed development has been amended to include a reduction from 215 to 170 Build to Rent homes, changes to building height and massing, updated elevation design and increased greening ('the Revised Scheme'). Accordingly, substitution plans and additional information are being submitted for determination as part of the current live planning application (ref. PL/24/1155).
- IV. 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 remains the Reading Borough Local Plan (adopted November 2019) and relevant policy based material considerations include the emerging Reading Borough Local Plan Partial Update (LPPU) (submission version, May 2025) and the National Planning Policy Framework (NPPF) (December 2024 (amended February 2025)).
- V. The new NPPF (December 2024 (amended February 2025)) emphasises the need to increase the supply of new homes in England and paragraph 125c of the new NPPF (December 2024 (amended February 2025)) further supports proposals for the use of brownfield land to support identified housing needs in the absence of substantial harm. The emerging LPPU (May 2025, submission version) also proposes an increased housing requirement. The increasing need for additional housing provision on sustainable brownfield land is therefore clearly identified in both recent national and local planning policy. The proposed development seeks to provide additional housing (including affordable housing despite viability considerations) at a sustainable location in Central Reading to support identified needs and it is clear that no 'substantial harm' exists. The proposed development therefore fully accords with the aims of national and local planning policy.
- VI. 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. The supporting technical information further demonstrates that the proposals are wholly acceptable based on the analysis undertaken.

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- VII. The proposed development complies with the Development Plan as a whole and material considerations further support the conclusion that the proposed development should be approved without delay. The planning balance falls in support of granting planning permission and it is respectfully requested that the planning application is approved without delay.

1. Introduction

- 1.1. This Planning Statement Addendum has been prepared by Savills on behalf of John Lewis Partnership BTR Ltd (JLP) ('the Applicant') in support of a current live planning application (ref. PL/24/1155) at the former John Lewis Depot, Letcombe Street, Reading ('the Site'), which is currently subject to determination by Reading Borough Council ('RBC'). This Addendum should be read in conjunction with the submitted Planning Statement (August 2024).
- 1.2. The current live planning application at the Site was validated on 3 October 2024 and has since been subject to consultation and detailed engagement with RBC planning officers, statutory consultees, neighbours and local residents. In response to the feedback received, the design of the proposed development has been amended ('the Revised Scheme') and revised plans and additional information is submitted for determination as part of the current live planning application (ref. PL/24/1155).
- 1.3. The updated description of development for the Revised Scheme is as follows:

"Demolition of the existing building and redevelopment of the site comprising erection of a new building for up to 170 build to rent residential dwellings (Use Class C3) together with flexible community space (Use Class F1/F2), residents' facilities, landscaping, public realm, amenity space and cycle parking."

Revised Information Submission

- 1.4. This Planning Statement Addendum provides details of the Revised Scheme based upon the accompanying updated application drawings and technical reports listed below. It should also be read in conjunction with the submitted Planning Statement (August 2024) in order to provide a comprehensive understanding of the proposals.
- 1.5. In addition to this Planning Statement Addendum, the following revised information is being submitted with the current planning application, in accordance with RBC validation requirements and previous correspondence with RBC planning officers, to provide details of the Revised Scheme:
 - Updated application drawings, prepared by Carey Jones Chapman Tolcher (CJCT) (replacing previously submitted versions);
 - Updated Schedule of Residential Net & Gross Floor Areas, prepared by CJCT (replacing previously submitted version);
 - Updated CIL Additional Information form (replacing previously submitted version);
 - Updated Biodiversity Net Gain Assessment, prepared by AECOM (replacing previously submitted version);
 - Updated Daylight and Sunlight Assessment: Internal Daylight, Sunlight and Overshadowing Report, prepared by GIA (replacing previously submitted version);
 - Updated Daylight and Sunlight Assessment: Impact on Neighbouring Properties Report, prepared by GIA (replacing previously submitted version);

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- Design and Access Statement Addendum, prepared by CJCT (accompanying submitted Design and Access Statement);
- Updated Energy Statement, prepared by Hoare Lea (replacing previously submitted version);
- Updated Fire Statement: Gateway One, prepared by Hoare Lea (replacing previously submitted version);
- Updated Flood Risk Assessment and Drainage Strategy, prepared by Fairhurst (replacing previously submitted version);
- Updated Heritage, Townscape and Visual Impact Assessment, prepared by Montagu Evans (replacing previously submitted version);
- Updated landscaping drawings, prepared by Camlins (replacing previously submitted versions);
- Updated Landscape Strategy, prepared by Camlins (replacing previously submitted version);
- Updated Landscape and Ecology Management Plan, prepared by AECOM (replacing previously submitted version);
- Updated Noise Impact Assessment, prepared by Hoare Lea (replacing previously submitted version);
- Updated Operational Waste Management Strategy, prepared by SLR (replacing previously submitted version);
- Updated Sustainability Statement, prepared by Hoare Lea (replacing previously submitted version);
- Transport Assessment Addendum, prepared by Glanville (accompanying submitted Transport Assessment);
- Viability Assessment Addendum, prepared by DS2 (accompanying submitted Viability Assessment); and
- Wind and Microclimate Assessment, prepared by RWDI (replacing previously submitted version).

1.6. For clarity, the following technical reports accompanying the original planning application submission (August 2024) are unchanged and remain applicable to the determination of the current planning application:

- 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;
- Construction Management Plan, prepared by Graham Construction;
- Design and Access Statement, prepared by CJCT (now with Addendum referred to above);
- Economic Benefits Assessment, prepared by Savills;
- External Lighting Assessment (including External Lighting Design), prepared by Hoare Lea;
- Fire Statement: Qualitative Design Review, prepared by Hoare Lea;
- Framework Residential Travel Plan, prepared by Glanville;
- Phase I and II Environmental Site Assessment, prepared by Ramboll;
- Planning Statement, prepared by Savills (now with this Addendum);
- Social Value Strategy, prepared by Savills;
- Statement of Community Involvement, prepared by Cratus;

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- Transport Assessment, prepared by Glanville (now with Addendum referred to above);
- Utilities Assessment, prepared by Hoare Lea;
- Viability Assessment, prepared by DS2 (now with Addendum referred to above).

- 1.7. It is requested that the Local Planning Authority publish the submitted revised information, indicating where this supersedes previous information, on the Council's planning register to commence re-consultation as soon as possible.

Report Structure

- 1.8. The remainder of this Statement is set out as follows:
- Section 2 explains the status of the current application and background to the revised proposals;
 - Section 3 summarises the current revised proposals;
 - Section 4 sets out updates to the planning policy context;
 - Section 5 assesses the current revised proposals having regard to the updated planning policy context;
 - Section 6 includes an update regarding the anticipated planning obligations; and
 - Section 7 concludes the case for granting planning permission.

2. Context

Background

- 2.1. The current live planning application at the Site, for 215 build to rent residential dwellings together with flexible commercial / community space, was submitted on 30 August 2024 and was validated on 3 October 2024. The submitted planning application was informed by detailed pre-application engagement with RBC and the local community, as set out within the submitted Planning Statement (August 2024) and submitted Statement of Community Involvement (SCI) (August 2024), and was accompanied by a full suite of planning application drawings and technical reports to explain the proposed development at the Site. The planning policy context at the time of submission has subsequently changed which is addressed further in sections 4 and 5 below.

Consultee Feedback

- 2.2. The submitted application was published for consultation by RBC and the following formal statutory consultee responses have been received to date.
- *RBC Waste Officer (11/10/24)* – clarification sought regarding proposed waste strategy;
 - *Thames Water (11/10/24)* – highlighted potential building works agreements required and subsequently confirmed no objection;
 - *Fire Officer (23/10/24)* – highlighted detailed requirements regarding fire service access;
 - *Historic England (25/10/24)* – no detailed comments;
 - *Reading Conservation Area Advisory Committee (29/10/24)* – concerns raised based on design and heritage impacts on the Conservation Area;
 - *Katesgrove Community Association (29/10/24)* – general support with amendments sought to design and massing;
 - *RBC Access Officer (31/10/24)* – clarification sought regarding proposed access strategy;
 - *Thames Valley Police (31/10/24)* – concerns raised regarding access into development and active frontages;
 - *RBC Ecology Officer (31/10/24)* – general support subject to conditions and amendments to planting species;
 - *Health & Safety Executive (13/11/24)* – general support and noting later regulatory requirements;
 - *RBC Transport (02/12/24)* – general support subject to requested amendments to parking provision and lighting strategy;
 - *RBC Natural Environment Officer (05/12/24)* – general support with amendments sought to planting palette, maintenance and SuDS strategy;
 - *RBC SuDS Officer (10/01/25)* – concerns raised based on proposed drainage strategy;
 - *RBC Conservation Officer (20/01/25)* – concerns raised regarding potential harm to heritage assets;
 - *Environmental Protection (18/02/25)* – general support subject to conditions;
 - *Archaeology (04/04/25)* – some additional investigation recommended via condition;

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- *Reading Design Review Panel (28/05/25)* – detailed comments regarding scale, massing, detailing and overall design approach;
- *Local residents* – 100 comments of support regarding the principle and need for new residential development. 1 comment of objection.

- 2.3. JLP has reviewed and responded to the consultation feedback received during the course of determination to address the issues raised and, as described below, undertaken further detailed engagement to inform the current revised proposals, as summarised further below.

Post-Submission Engagement

RBC Officers

- 2.4. JLP has actively engaged with RBC Officers through ongoing post-submission discussions to consider the consultee feedback received and to aid positive determination.
- 2.5. JLP entered into a second Planning Performance Agreement (PPA) with RBC in February 2025 and has subsequently had regular meetings and correspondence with RBC Officers from February 2025 onwards in order to discuss proposed amendments, technical consultee responses and overall determination progress.

Reading Design Review Panel

- 2.6. A design review meeting was held with the Reading Design Review Panel on 22 May 2025 to present and seek feedback on the draft revised proposals. A formal written response was received on 29 May 2025 including comments regarding the proposed scale, massing, detailing and overall design approach, as referenced further below.

Community Engagement

- 2.7. JLP has maintained engagement with key stakeholders and the local community following the application submission in order to provide updates and discuss opportunities to inform and benefit from the revised proposals. This has included discussions with a number of local community groups regarding the use of the proposed community space and garden area.

Response to Feedback

- 2.8. As set out above, JLP has remained committed to undertaking ongoing engagement and has considered the feedback received in order to inform the amendments to the proposed development as currently submitted. The following section sets out the project team response to the key feedback received which has informed the evolution of the Revised Scheme.

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Issue	JLP Response
Affordable housing	The viability of the project is challenging and is impacted by both site-specific factors and the current macro-economic environment, including build cost inflation, site contamination/enabling, cost of finance and changes to building regulations. Recent significant increases to costs have severely impacted the ability to deliver affordable homes and this was confirmed in the submitted Viability Assessment (August 2024) which concluded that no affordable housing could be viably delivered, and which was verified and agreed by the Council's independent assessor. JLP's commitment remains however to deliver as many affordable homes as viably possible and they remain committed to delivering the same % of affordable housing as per the submitted application. Despite recent significant increases in costs, 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 the information set out in the updated FVAA (July 2025), based on JLP's long-term ownership and commitment to the new BTR community. The proposed development will also remain subject to a review mechanism to enable the Council to secure additional affordable housing should the proposed development economics improve. Local Plan Policy H3 states that, <i>"In all cases 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"</i> [our emphasis]. The 2021 Affordable Housing SPD (2021) (section 6) further sets out the viability assessment process. These local policies are also to be read alongside the NPPF and PPG national guidance. On the basis of the independently verified Viability Assessment (August 2024) and the accompanying FVAA (July 2025), the proposed approach to provide affordable housing is therefore compliant with Local Plan Policy H3.
Height, scale and massing / heritage and townscape	The comments received have been subject to detailed review and a number of design iterations have been discussed with Officers. Whilst the applicant team remains of the view that the original design was acceptable in heritage and townscape terms, it has listened carefully to all feedback and, as a direct result of feedback received, the Revised Scheme now includes a substantial reduction to the overall height of the building and revised massing to transition with the surrounding area (as detailed further below and in the accompanying revised application drawings and DAS Addendum). The proposed changes have been informed and supported by accompanying technical assessments which demonstrate that the Revised Scheme will have no harmful impacts in relation to matters including heritage, townscape and residential amenity.

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Elevation design	As above, the comments received have been subject to detailed review and a number of design iterations have been discussed with Officers. The Revised Scheme now includes revisions to the elevational design, including in relation to the brickwork detailing, metal cladding, parapet line and articulation along Mill Lane frontage (as detailed further below and in the accompanying revised application drawings and DAS Addendum).
Site layout	The Revised Scheme includes a reduced building footprint with setbacks to Letcombe Street and Crossland Road, including the 'central finger' facing Crossland Road, in order to unify the garden spaces and improve greening of Letcombe Street.
Car parking	Following discussions with officers at RBC, it has been agreed that no car parking is required to serve the development, which it has been accepted can be entirely car-free without detriment to highway safety, in compliance with RBC's Revised Parking Standards and Design Supplementary Planning Document. The proposed Car Club bay has been relocated to Crossland Road.
Waste	240L food waste bins have been provided for in the Revised Scheme. However, refuse chutes are now no longer proposed.
Accessibility	These queries have been reviewed and are addressed through updates in the Revised Scheme as explained in the accompanying technical reports. A separate detailed response was issued to the RBC Access Officer to provide clarification prior to this submission.
Landscaping	The comments have been reviewed and the Revised Scheme includes proposed updates to the landscape strategy to include further consideration and updates to the planting palette.
Drainage	The area of permeable paving is shown on the updated drawings following updates to and agreement of parking provision. Updated drainage calculations and an exceedance route are also included within this submission. It is difficult to create SuDs within the green spaces on site due to level differences and space within the site, however permeable paving has been maximised where possible. A separate detailed response was issued to the RBC SuDS Officer to provide clarification prior to this submission.

3. Revised Scheme

Overview

3.1. The key proposed changes to the submitted development proposals are set out below. Further details of the Revised Scheme are summarised further below and detailed within the accompanying Design and Access Statement Addendum and revised application drawings.

- Reduction from 215 to 170 build to rent homes;
- Changes to proposed height and massing, including:
 - Reduction to building height along Mill Lane frontage from max. GF+10 storeys to max. GF+7 storeys;
 - Reduction to building height stepping down to GF+5 storeys along Crossland Road to the south and east towards the Conservation Area;
 - Building form ‘nib’ introduced at eastern end adjacent to Central Club;
- Updates to detailed elevation design, including revisions relating to brickwork detailing, metal cladding and parapet line and articulation along Mill Lane frontage including introduction of Juliet balconies;
- Setting back of building footprint along Letcombe Street to introduce greening;
- Setting back of central ‘finger’ on Crossland Road to unify garden spaces;
- Introduction of 4 no. ground floor apartments with defensible space to Crossland Road;
- Updates to proposed unit mix;
- Internal changes to ground floor layout including relocation of flexible community space;
- Removal of bin chutes throughout;
- Removal of car parking spaces previously proposed, with the exception of 1 Car Club space to be relocated to Crossland Road; and
- Increased greening and improved pedestrian footway arrangements to eastern side of Crossland Road.

3.2. The key proposed changes are explained in turn further below.

Quantum and Mix

3.3. The proposed changes to building height and massing (as explained below) have resulted in a reduction in the number of build to rent dwellings from 215 to 170 homes. This now includes 4 apartments located on the ground floor as set out on the accompanying updated Schedule of Residential Net & Gross Floor Areas.

3.4. Alongside this, the dwelling mix has been revised as shown below. A range of 1, 2 and 3-bedroom dwellings are maintained, however there is a reduction in the overall proportion of 1-bed units (reduced from 52% to 46%) and an increase in the overall proportion of larger 2 and 3-bed units (increased from 49% to 54%). The overall proportion of 3-bed units (6%) is maintained.

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	Submitted Application (August 2024)	Revised Scheme (June 2025)
Unit Type	No. / % of Units (rounded %)	No. / % of Units (rounded %)
1-bed 1-person	20 (9%)	19 (11%)
1-bed 2-person	81 (38%)	60 (35%)
1-bed 2-person (accessible)	10 (5%)	-
2-bed 3-person	10 (5%)	35 (21%)
2-bed 4-person	78 (36%)	42 (25%)
2-bed 4-person (accessible)	4 (2%)	4 (2%)
3-bed 4-person	6 (3%)	-
3-bed 5-person	6 (3%)	5 (3%)
3-bed 5-person (accessible)	-	5 (3%)
Total	215	170

Affordable Housing

- 3.5. JLP's commitment remains to deliver as many affordable homes as viably possible. However, recent significant increases to build costs, site-specific factors, requirements to meet latest fire and building regulations, higher interest rates and softening of property yields have severely impacted the ability to deliver affordable homes (as confirmed in the submitted Viability Assessment (August 2024) which concluded that no affordable housing could be viably delivered, and which was verified and agreed by the Council's independent assessor).
- 3.6. Following detailed review and ongoing engagement, JLP has reviewed the proposed affordable housing provision and made a commercial decision to deliver 10% affordable housing, provided as Affordable Private Rent (APR) at rental levels set at Local Housing Allowance (LHA) levels (based on the information set out in the updated FVAA (July 2025)). The affordable housing will be tenure-blind and built and fitted out to the same high standard as the market rent homes. The proposals reflect JLP's long-term ownership of the new BTR community and commitment to delivering as many affordable homes as viably possible.
- 3.7. The proposed development will also remain subject to a Deferred Payment Mechanism (DPM) which will be secured via the Section 106 agreement. This will enable the Council to secure additional affordable housing should the proposed development economics improve when compared to the application stage viability assessment.

Height, Scale and Massing / Site Layout

- 3.8. The overall height of the building has been reduced along the Mill Lane frontage from the submitted proposals of 7 to 11 storeys (ground floor plus 6 to 10 storeys) to the Revised Scheme of 5 to 8 storeys (ground floor plus 4 to 7 storeys), as shown on the accompanying revised elevation drawings. The building height then steps down to 6 storeys (GF+5) towards the courtyard gardens and Conservation Area to the south and east. An additional 5-storey (GF+4) building form 'nib' has been introduced at the eastern end of the Site to transition to the adjacent 4-storey Central Club and Market Place / London Street Conservation Area.

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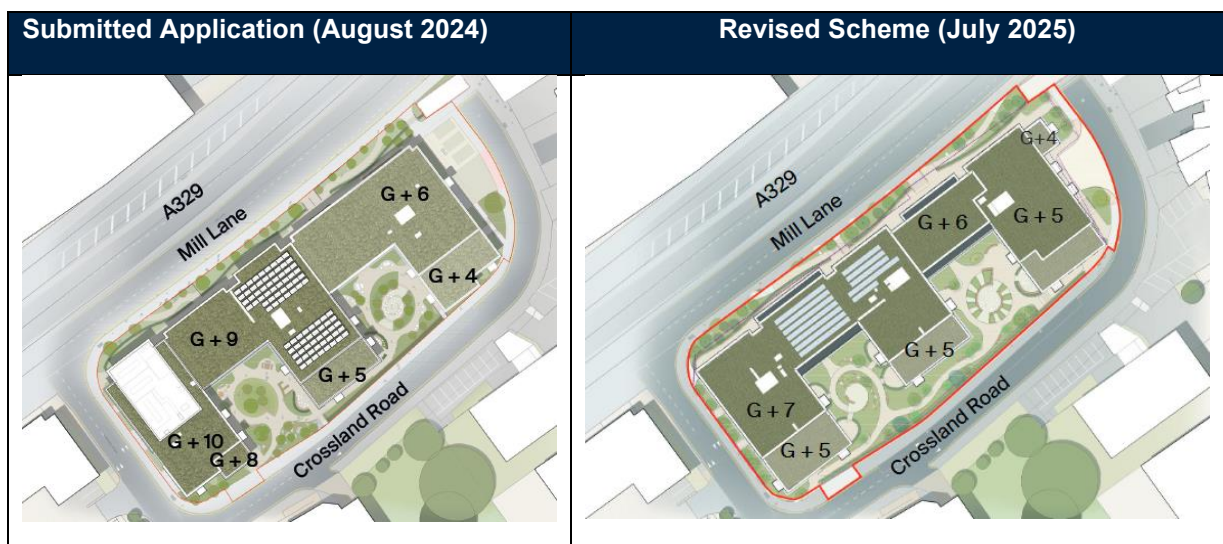
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3.9. The overall footprint of the building within the site layout has also been reduced, as a result of setting back the building line along Letcombe Street and Crossland Road (in order to introduce greening and additional planting along the western Site boundary) including setting back the central 'finger' (in order to unify the communal garden spaces to the south of the Site). Additional landscaping is also proposed to the east of the Site on Crossland Road following the removal of parking spaces (as referred to further below).

3.10. A comparison of the proposed floor areas and building heights is set out below.

	Submitted Application (August 2024)	Revised Scheme (July 2025)
Level	Building GIA (sqm)	Building GIA (sqm)
0	2,236	2,066
1	2,241	2,158
2	2,241	2,158
3	2,241	2,158
4	2,241	2,158
5	2,085	2,129
6	1,965	1,257
7	1,302	1,036
8	1,302	-
9	1,265	-
10	540	-
Total	19,659	15,119



Elevation Design

- 3.11. The elevation design has been subject to a detailed review as part of ongoing engagement with Officers. A number of updates are proposed including revisions relating to brickwork detailing, metal cladding and parapet line and articulation along Mill Lane frontage including introduction of Juliet balconies. The proposed elevation design is detailed further within the accompanying revised application drawings and DAS Addendum, including:

- Brickwork corbelling and detailing to articulate parapet;
- Quoins to mark building corners;
- Aluminium cladding with vertical joints to the 8th floor;
- Decorative metalwork / balustrades to balconies; and
- Diamond brickwork detailing.

Landscaping

- 3.12. The propose landscape strategy includes the retention and enhancement of boundary planting around the Site boundaries together with the creation of communal gardens in courtyard areas fronting Crossland Road.
- 3.13. The landscaping proposals (as shown on the accompanying Landscape Strategy) have been revised based on changes to the proposed site layout referred to above. This includes the unification of the garden areas along Crossland Road which are designed to provide welcoming green space with step-free access to support residents and community groups. In addition, habitat planting is proposed to be created at Letcombe Street along the south-west Site boundary and at Crossland Road along the north-east Site boundary in order to provide additional enhanced public realm.
- 3.14. The overall changes result in an increase in external amenity space provision across the Site from 718sqm to 927sqm and a significant increase in biodiversity net gain of +328%.

Ground Floor Layout

- 3.15. The ground floor layout has been revised (as shown on the accompanying revised application drawings) to seek to increase the active frontage along Mill Lane and around the Site boundaries, including an increased entrance lobby, relocation of the gym and wellness studio to the Mill Lane frontage and the use of glazed elevational treatment. The flexible community space and resident amenity spaces have also been relocated so that the community space benefits from a south-facing aspect with direct access to the adjacent communal garden. A large communal lobby area is maintained which will connect with supporting residents facilities and provide access to the communal garden space.

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Highways and Servicing

- 3.16. The proposals are for a car-free development with the exception of 1 Car Club parking space. The parking spaces previously proposed along Crossland Road have been removed following engagement and agreement with RBC Highways Officer and in compliance with RBC's Revised Parking Standards and Design Supplementary Planning Document. Residents and visitors who are Blue Badge holders will remain eligible to park on-street along Crossland Road and in the local area, and apply for a disabled parking space, in the usual way. The Car Club parking space that was previously proposed on Mill Lane has been relocated to Crossland Road, alongside the existing pay and display parking spaces which will remain. Cycle parking spaces have been reduced in line with the proposed reduction of units.
- 3.17. The three proposed refuse stores have been slightly relocated within the ground floor layout and bin chutes have been removed throughout the building. No changes are proposed to the servicing and refuse collection arrangements.

4. Planning Policy Context

Introduction

- 4.1. 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.
- 4.2. The adopted Development Plan relevant to the application comprises the Reading Borough Local Plan (adopted November 2019), as set at section 5 of the submitted Planning Statement (August 2024). The adopted Development Plan therefore remains unchanged from the application submission.
- 4.3. Relevant material considerations include national policy (primarily expressed through the National Planning Policy Framework (NPPF) (December 2024 (amended February 2025)) and Planning Practice Guidance), the Council's emerging Local Plan Partial Update (LPPU) and additional guidance produced by the Council (including Supplementary Planning Documents (SPDs)). The publication of the NPPF (December 2024 (amended February 2025)) and progress regarding the emerging LPPU have occurred following the application submission and are detailed further below.

National Planning Policy Framework (NPPF) (December 2024 (amended February 2025))

- 4.4. The National Planning Policy Framework (NPPF) was most recently published in December 2024 (and amended in February 2025) and is a relevant material consideration in the determination of the current application. A key focus of the latest changes to the NPPF is the need to increase the supply of new homes in England.
- 4.5. The key changes made in the NPPF of relevance to the application are set out below.
 - Paragraph 11d(ii) – amended to state that the assessment of adverse impacts should have particular regard to matters including the need to direct development to sustainable locations and make efficient use of land.
 - Paragraph 61 – now includes a stronger emphasis on the need to meet identified housing needs.
 - Paragraph 62 – now strengthens the need to use the standard method to calculate local housing needs. The standard method has also been revised which, in Reading, results in an increase from the current housing target of 689 dwellings per annum (dpa) (Local Plan (2019)) to a local housing need of 1,028 dpa.
 - Paragraph 76 – reinstates the requirement to demonstrate a five-year housing land supply including appropriate buffers.
 - Paragraphs 108 / 115 – sets out a new 'vision-led' approach to transport solutions which further promotes the use of sustainable travel modes.
 - Paragraph 125c – further emphasises that proposals for the use of brownfield land to support identified housing needs 'should be approved unless substantial harm would be caused'.

- Paragraph 130 – removes previous national guidance which outlined that significant uplifts in the density of residential development may be inappropriate if the resulting built form would be out of character.
- Paragraph 234 – includes transitional arrangements relating to ongoing plan-making, including that Local Plans which have reached Regulation 19 stage by 12 March 2025 and meet at least 80% of local housing need will be examined under the previous NPPF (2023). The transitional arrangements are therefore of relevance to the emerging Reading Local Plan Partial Update (LPPU) as referred to below.

Emerging Local Plan Partial Update (LPPU)

- 4.6. As referred to in the submitted Planning Statement (August 2024), the Council is currently preparing a Local Plan Partial Update (LPPU) to update and eventually replace around half of existing policies in the current adopted Local Plan (2019).
- 4.7. Following the application submission, a formal Regulation 19 consultation was undertaken on the Pre-Submission Draft version of the LPPU in November and December 2024. Notably, the Pre-Submission Draft LPPU (November 2024) proposed to allocate the site at 'John Lewis Depot, Mill Lane' for residential development (draft Policy CR14r). Draft Policy CR14r requires that development should:
- *'Avoid detrimental effects on the setting of listed buildings and the Conservation Area;*
 - *Take account of potential archaeological significance;*
 - *Address noise impacts on residential use;*
 - *Address air quality impacts on residential use; and*
 - *Address any contamination on site.'*
- 4.8. The Pre-Submission Draft LPPU (November 2024) also includes proposed updates to the following adopted Local Plan (2019) policies of relevance to the current application:
- 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 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);

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- Policy TR5 (Car and Cycle Parking and Electric Vehicle Charging);
- Policy CR2 (Design in Central Reading);
- Policy CR6 (Living in Central Reading).

- 4.9. A response was submitted to the Regulation 19 consultation on behalf of JLP in December 2024. The response welcomed the proposed allocation of the former John Lewis Depot for residential development, but recommended a number of changes to draft Policy CR14r (including significantly increasing the quantum of development) and other draft LPPU policies in order to ensure the soundness of the Plan.
- 4.10. The LPPU was submitted for examination to the Secretary of State on 9th May 2025 and therefore carries some weight as a material consideration in the determination of the application. The LPPU was submitted under the NPPF transitional arrangements and will be examined under the previous NPPF (2023). Examination hearings are currently awaited.

5. Planning Assessment

Introduction

- 5.1. 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. As referred to above, the Development Plan includes the Reading Borough Local Plan (adopted November 2019) and relevant material considerations include the NPPF (December 2024 (amended February 2025)) and emerging LPPU (May 2025, submission version).
- 5.2. The submitted Planning Statement (August 2024) set out in detail the full planning assessment which is not therefore repeated below. Where policy analysis is provided in the submitted Planning Statement (August 2024) which remains directly applicable (without amendment) to the Revised Scheme it has also not been repeated here but is taken to apply equally. However, this section of the Planning Statement Addendum provides an update to the planning assessment and overall planning balance relating to the Revised Scheme, based on the accompanying revised plans and updated technical reports and recent updates to planning policy.

Principle of Development

- 5.3. The new NPPF (December 2024 (amended February 2025)) and emerging LPPU include recent key updates of relevance to the principle of development and overall planning balance which are therefore considered below.

Emerging draft site allocation

- 5.4. As referred to above, following the original application submission, the emerging draft LPPU (May 2025, submission version) now proposes to allocate the Site for residential development (draft Policy CR14r). This follows the Council's previous acknowledgement that the existing Site allocation for public car parking (Local Plan (2019) Policy CR14g) was not deliverable and required updating. The LPPU was submitted for examination in May 2025 and therefore carries some weight as a material consideration in the determination of the application.
- 5.5. Paragraph 127 of the NPPF (December 2024 (amended February 2025)) is clear 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."*
- 5.6. On this basis and in light of ongoing post-submission engagement with Officers, the principle of the proposed development is considered to be acceptable.

Housing provision and development of brownfield land

- 5.7. The new NPPF (December 2024 (amended February 2025)) emphasises the need to increase the supply of new homes in England. Indeed Paragraphs 61 and 62 of the new NPPF (December 2024 (amended February 2025)) strengthen the need to meet identified housing needs calculated using the standard method – and the new standard method identifies a significant increase in local housing need in Reading from the current housing target of 689 dwellings per annum (dpa) (Local Plan (2019)) to a need of 1,028 dpa.
- 5.8. The emerging LPPU (May 2025, submission version) proposes an increased housing requirement of 825dpa, albeit this remains below the standard method output and is progressing based on the transitional arrangements set out in the NPPF (December 2024 (amended February 2025)), and therefore the Council will need to plan for a further increase in housing in the next Local Plan.
- 5.9. Paragraph 125c of the new NPPF (December 2024 (amended February 2025)) further emphasises that proposals for the use of brownfield land to support identified housing needs ‘should be approved unless substantial harm would be caused’ and it is clear that no such ‘substantial harm’ exists as detailed below. Similarly, the recent ‘Brownfield Passport: Making the Most of Urban Land’ Policy Paper (February 2025) set out the Government’s proposals for a default ‘yes’ answer to suitable development of brownfield land.
- 5.10. The increasing need for additional housing provision on sustainable brownfield land is therefore clearly identified in both recent 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.

Assessment

Design / Heritage

- 5.11. The NPPF (December 2024 (amended February 2025)) provides overarching design guidance which is reflected in adopted Local Plan (2019) Policy CC7, as referred to in detail in the submitted Planning Statement (August 2024). Overall, 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.’*
- 5.12. With regard to heritage and townscape, the adopted Local Plan (2019) includes a number of overarching policies including Policies EN1, EN3, EN4, EN5 and EN6, as also referred to further in the submitted Planning Statement (August 2024). The site allocation (draft Policy CR14r) in the draft LPPU (submission version, May 2025) also specifically requires development to, *‘avoid detrimental effects on the setting of listed buildings and the Conservation Area.’*

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- 5.13. As explained above, the applicant team remains of the view that the original design was acceptable in heritage and townscape terms; however it has listened carefully and as a direct result of feedback received, consideration of local heritage assets and relevant local planning policies, the design of the submitted development proposals has been amended to include changes to building height and massing, updated elevation design and increased greening. The Revised Scheme now includes a substantial reduction to the overall height of the building and revised massing in order to further ensure a positive response to the local townscape character and local heritage assets (including the Market Place and London Street Conservation Area and nearby listed buildings) whilst maintaining efficient use of land to meet identified housing needs.
- 5.14. The accompanying Design and Access Statement Addendum further illustrates the proposed changes and presents the design of the Revised Scheme. Alongside this and to inform the proposed amendments, an updated Heritage, Townscape and Visual Impact Assessment (HTVIA) has been undertaken to consider the Revised Scheme in relation to its heritage, townscape and visual context.
- 5.15. The updated HTVIA explains that the Revised Scheme has been designed to respond to and enhance the surrounding townscape context, mediating between large-scale development to the north and low-scale historic development to the south and east through stepped reductions in height towards the Conservation Area. The HTVIA adds that the proposed materials will further respond to and enhance the existing townscape context (through the use of red and grey brick with detailing and lighter colour cladding) which will better integrate the proposals within the surrounding area.
- 5.16. Based on the proposed amendments, the updated HTVIA concludes that the Revised Scheme will have a neutral effect on the setting and significance of local heritage assets, and explains that heritage assets in close proximity will benefit from the increased landscaping and active frontages which will increase pedestrian movement and appreciation of heritage assets. Overall, the HTVIA identifies 'no harm' to any heritage assets within the study area. Townscape effects are predicted to be moderate beneficial to minor beneficial based on improvements to the appearance, character and function of the Site.
- 5.17. Based on the proposed changes detailed in the DAS Addendum and the detailed assessment within the updated HTVIA, it is clear that the Revised Scheme delivers high design quality which maintains and enhances the local character, in accordance with the relevant provisions of the NPPF (December 2024 (amended February 2025)) and local planning policies relating to design and heritage.

Unit Mix

- 5.18. As set out in the submitted Planning Statement (August 2024), 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). Local Plan Policy H2 encourages residential development to include a mix of housing, particularly family homes of three or more bedrooms. Policy CR6 states that, 'as a guide', in Central Reading (in which the Site is located), a maximum of 40% units should be 1-beds and a minimum of 5% of units should be 3-beds.

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- 5.19. The Revised Scheme continues to exceed the 5% minimum requirement for 3-bed units set out in Policy CR6 and supports the overall need for family housing set out in Policy H2. Overall, a third of the proposed units (33%) comprise 3-bed units or larger 2-bed units suitable for families of 4 people, in line with the overall aims of Policies H4 and CR6.
- 5.20. Whilst the proportion of 1-beds exceeds the guidance set out in Policy CR6, the maximum threshold is a 'guide' and there is a notable reduction compared to the submitted application. The majority of 1-bed units are also larger units suitable for 2 people (60 (76%) of the 79 1-bed units). Policy CR6 is also clear that viability is a consideration to unit mix and the submitted Viability Assessment Addendum continues to set out the significant market constraints that present challenges to the proposed development.
- 5.21. 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

- 5.22. As set out in the submitted Planning Statement (August 2024), Local Plan Policies H3 (Affordable Housing) and H4 (Build to Rent Schemes) set out the Council's requirements relating to affordable housing provision.
- 5.23. Policy H3 seeks 30% affordable housing provision on sites of 10 or more dwellings and states that a viability assessment is required to justify a lower affordable housing contribution. Policy H3 states that, "*In all cases 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*" [our emphasis]. The 2021 Affordable Housing SPD (2021) (section 6) further sets out the viability assessment process.
- 5.24. Policy H4 and the supporting text (paragraph 4.4.32) however recognise that Build to Rent developments have different viability models and therefore flexibility regarding affordable housing is required.
- 5.25. In the Revised Scheme, JLP's aspiration remains to on site affordable homes to support local needs and the Council's priorities. However, the submitted Financial Viability Assessment (FVA) and FVA Addendum explain the market constraints that present challenges to the viability of the proposed development and conclude that no affordable housing can viably be delivered. Notably the findings of the submitted FVA has been reviewed and independently verified by the Council's viability assessor during determination.
- 5.26. JLP's decision to deliver 10% affordable housing (provided as APR at rental levels set at LHA levels and with units tenure-blind and built to the same high standards as the market units) therefore exceeds the maximum reasonable level of affordable housing, as agreed by the Council's independent viability assessor. Accordingly, having regard to the FVA and FVA Addendum, the proposed 10% affordable housing provision complies with the provisions of Policies H3 and H4 and is a benefit which should be positively acknowledged in the overall planning balance.

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- 5.27. In addition, as set out in the Section 106 Heads of Terms (section 6 below), the proposed development will also be subject to a Deferred Payment Mechanism (DPM) which will enable the Council to secure additional affordable housing should the proposed development economics improve.
- 5.28. For full transparency, JLP makes the commitment of 10% affordable housing on a without prejudice basis to the evidenced financial viability position, which shows that the scheme cannot viably support any affordable housing contribution, and does so for consideration of the determination of the application locally as reflected in the current Section 106 Heads of Terms. Any increase in contributions or obligations and/or if local determination is not possible, will impact on the cost profile for this scheme and therefore may need to be reflected in any consideration the final affordable housing commitment.
- 5.29. JLP welcomes further discussions with the Council and its viability advisors during determination of the application and preparation of the Section 106 Agreement.

Highways

- 5.30. The Transport Assessment (TA) Addendum considers the proposed changes relating to highways and assesses the potential highways impacts of the Revised Scheme.
- 5.31. The Revised Scheme retains the same access arrangements as the submitted proposals but includes several detailed changes to the public highway on Crossland Road, as detailed further in the TA Addendum.
- 5.32. The submitted TA (August 2024) estimated that the development would generate approximately 1,369 person trips per day. However, following the reduction to 170 residential units, the TA Addendum now estimates around 1,082 daily person trips will be generated, of which the expected vehicle movements are expected to be very low owing to the proposed car-free development (including now the proposed removal of parking spaces, as agreed with Highways Officers). The TA Addendum concludes that the proposed development will not therefore have any material impact on the existing and surrounding transport network, in accordance with the NPPF (December 2024 (amended February 2025)) and Local Plan Policies T1 and T3.

Car and Cycle Parking

- 5.33. The removal of the parking spaces previously proposed, and relocation of the Car Club space to Crossland Road, is proposed based on post-submission engagement and agreement with the RBC Highways Officer and consideration of local planning policy requirements. Residents and visitors who are Blue Badge holders will remain eligible to park on-street along Crossland Road and in the local area, and apply for a disabled parking space, in the usual way. These changes further support the proposed car-free development and prioritisation of sustainable transport modes, in accordance with the requirements of Local Plan Policy TR5 and the Revised Parking Standards and Design SPD (2011).
- 5.34. The cycle parking provision has reduced in line with the reduction in residential units proposed and remains in compliance with the local cycle parking standards.

Energy and Sustainability

- 5.35. As referred to in the submitted Planning Statement, 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).
- 5.36. An updated Energy Statement and Sustainability Statement accompany this submission to address relevant planning policies and reflect the Revised Scheme.
- 5.37. The updated Energy Statement further details the proposed energy strategy based on a 'fabric first' approach through the 'be lean', 'be clean', 'be green' energy hierarchy. This includes a continued design approach based on utilising low and zero carbon technologies to heat and power the development. The updated Energy Statement also details the findings of an overheating assessment and explains that all dwellings will be provided with mechanical ventilation with heat recovery (including boost operation and cooling coil) to reduce overheating risks.
- 5.38. Overall, based on Building Regulations Part L 2021, the energy assessment concludes that the Revised Scheme will result in a reduction in regulated CO2 emissions of 69.3% (similar to the submitted proposals) after incorporation of heat pumps and PV. A remaining offset payment requirement is identified to be agreed through the Section 106 agreement.
- 5.39. With regards to Policy CC5, the Statement also details recent engagement with RBC Officers regarding the emerging District Heat Network proposals and explains that, based on the scheme current timeline and uncertain infrastructure costs and requirements, it is not feasible to connect, or make provision for connection to the District Heat Network.
- 5.40. On the basis of the above and the accompanying updated Energy Statement and Sustainability Statement, the proposed development accords with Local Plan Policies CC2, CC3, CC4 and H5.

Waste

- 5.41. Local Plan Policy CC5 required development to minimise waste and promote sustainable approaches to waste management. Based on Policy CC5, an updated Sustainability Statement and Operational Waste Management Strategy (OWMS) accompany this submission to reflect the Revised Scheme and respond to consultation feedback.
- 5.42. As explained in the updated Sustainability Statement, the Revised Scheme continues to 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.

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- 5.43. The updated OWMS further sets out guiding principles to ensure that waste arising from the proposed development is managed in a sustainable manner with minimal impact on the environment, in accordance with Policy CC5. This includes updates in relation to the removal of bin chutes, relocation of refuse stores, waste collection and food waste bins.

Ecology

- 5.44. As referred to in the submitted Planning Statement (August 2024), Local Plan Policy EN12 requires development to protect and where possible enhance biodiversity interest. The Environment Act 2021 now mandates a minimum of 10% Biodiversity Net Gain (BNG).
- 5.45. Further to the submitted Biodiversity Net Gain (BNG) Assessment (August 2024), an updated Assessment has been prepared to address relevant planning policy requirements and reflect the Revised Scheme.
- 5.46. The submitted BNG Assessment (August 2024) predicted a net gain of +272.10% for area-based habitat units and a net gain of 0.16 for hedgerow habitat units. However, owing to the updated landscaping proposals, including increased hedgerow creation and additional tree planting, the updated BNG Assessment predicts an increased net gain of +328.05% for area-based habitat units and an increased net gain of 0.42 for hedgerow habitat units. The Revised Scheme will thereby provide even greater BNG significantly in excess of the minimum Environment Act requirements and in accordance with Local Plan Policy EN12.

Flood Risk and Drainage

- 5.47. Local Plan Policy EN18 states that all major developments should incorporate sustainable drainage systems (SuDS) as appropriate and run-off rates should be no greater than the existing conditions of the site and aim to reflect greenfield conditions.
- 5.48. Based on Policy EN18, an updated FRA and Drainage Strategy accompanies this submission to reflect the Revised Scheme and address previous consultation feedback following previous review and engagement. The updated FRA and Drainage Strategy further explains and justifies the SuDS components proposed as part of the Revised Scheme including the area of permeable paving provision following changes to parking provision. Additional drainage calculations are also included in response to consultation feedback.
- 5.49. As explained in the updated FRA and Drainage Strategy, Thames Water has confirmed that the surface water discharge rate should be restricted to 2 l/s. The surface water network discharges at a rate of 0.5 l/s south of the Site and at a rate of 1.5 l/s north of the Site.
- 5.50. On the basis of the above, the FRA and Drainage Strategy concludes that the proposals are compliant with relevant planning policy guidance.

Noise

- 5.51. Local Plan Policy EN17 states that *plant noise level should be at least 10dBA below the existing background level at the nearest noise sensitive receptor*. Further to the submitted Noise Impact Assessment (NIA) (August 2024), an updated Noise Impact Assessment (NIA) has been undertaken to include an assessment of the Revised Scheme. The NIA explains that suitable internal sound levels can be achieved with acoustically rated double-glazed systems and conventional external wall build-up. The NIA further concludes that noise can be controlled to appropriate limits in line with Policy EN17.

Daylight and Sunlight

- 5.52. As set out in the submitted Planning Statement (August 2024), Local Plan Policy CC8 requires that developments do not have a detrimental impact on residential amenity in relation to daylight and sunlight (Policy CC8). Paragraph 5.3.49 of the Local Plan explains that the BRE guidelines on assessing the daylight and sunlight effects of development ‘will apply flexibly given the high density of the central area.’
- 5.53. An updated Daylight and Sunlight Assessment accompanies this submission to address Policy CC8 and assess the Revised Scheme. The updated Assessment explains that there have been significant improvements in the daylight and sunlight performance of the proposed building as a result of the proposed changes to height, scale and massing and layout, with increase in dual aspect units. The Assessment concludes that 80% of rooms (including combined living / kitchen / dining (LKD) rooms when a 150 lux threshold is applied for LKDs) will meet or exceed minimum daylight levels, with 99% of units including at least one bedroom which receives adequate levels of daylight. For sunlight, whilst sunlight levels are lower in north-facing units, 74% of all proposed dwellings have at least one room receiving a minimum of 1.5 hours of direct sunlight.
- 5.54. Overall, the Assessment concludes that, as a result of the proposed changes, the proposed development will provide future residents with very good daylight and sunlight amenity overall. On this basis, the Revised Scheme accords with Local Plan Policies CC7 and CC8.

Wind and Microclimate

- 5.55. Local Plan Policy CC8 also requires that developments of ‘more than 8 storeys’ do not have a detrimental impact on residential amenity in relation to wind.
- 5.56. The overall building has been reduced to include a maximum of 8 storeys and therefore falls below the threshold referred on in Policy CC8. Notwithstanding this, an updated Wind and Microclimate Assessment has been undertaken and accompanies this submission. The Wind and Microclimate Assessment explains that the Site has suitable conditions for the proposed development and concludes that conditions would be suitable and safe for occupant use.
- 5.57. On this basis, the proposed development accords with Local Plan Policy CC8 in relation to wind and microclimate.

Benefits of the Proposed Development

5.58. As set out in the submitted Planning Statement (August 2024) and Economic Benefits Statement (August 2024), 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. This remains the case for the Revised Scheme. The benefits of the proposed development are repeated below:

- Redevelopment of an underdeveloped, sustainable and brownfield town centre site providing much-needed housing in Reading;
- 170 thoughtfully designed, high quality, community integrated new rental homes for Reading;
- Homes owned and managed by the John Lewis Partnership, with the service 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 (10% at LHA levels) 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 community space to support and for the beneficial use of local community 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;
- New public and private landscaped spaces with increased tree planting, accessible play areas and public realm improvements;
- Delivery of significant Biodiversity Net Gain of +328% (significantly in excess of the 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 construction jobs with training and apprenticeship opportunities;
- Creation of operation phase jobs for local residents;
- Additional household spend supporting local goods and services in the borough;
- Public sector revenues through additional Council Tax revenue, Business Rates, New Homes Bonus, Community Infrastructure Levy and Section 106 contributions for public open space provision.

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Overall Planning Balance

- 5.59. The Revised Scheme proposes up to 170 build to rent residential homes, together with flexible community space, residents' facilities, landscaping, public realm, amenity space and cycle parking.
- 5.60. 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.
- 5.61. The proposed changes have been informed by a suite of technical information (including updated assessments relating to daylight / sunlight, ecology, fire, flood risk and drainage, heritage and townscape, noise, waste, highways and wind and microclimate) which demonstrate that the proposals are wholly acceptable based on the analysis undertaken.
- 5.62. Paragraph 11 of the NPPF (December 2024 (amended February 2025)) 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, the proposed development complies with the Development Plan as a whole and material considerations further support the conclusion that the proposed development should be approved without delay. The planning balance therefore falls in support of granting planning permission.

6. Planning Obligations

- 6.1. As part of ongoing post-submission engagement, and in accordance with paragraph 58 of the NPPF (December 2024 (amended February 2025)) JLP has continued dialogue with the Council regarding the planning obligations necessary in relation to the proposed development.
- 6.2. On this basis, updated Heads of Terms for the Section 106 agreement are set out below:
- Affordable housing provision – 10% on-site provision at LHA level and subject to a Deferred Payment Mechanism (DPM);
 - Residential Management Plan;
 - Contribution towards public open space provision;
 - BNG monitoring;
 - Public realm improvements;
 - Zero carbon offsetting contribution;
 - Employment, Skills and Training Plan (construction phase);
 - Community space provision;
 - Car Club provision;
 - Traffic Regulation Order.
- 6.3. JLP will continue further discussions with the Council to agree the planning obligations required to be secured via a S106 agreement. It is also acknowledged that the proposed development is liable to CIL based on the adopted CIL Charging Schedule (2015). In addition it is anticipated that a S278 agreement will be entered into with the Highways Authority to secure the carrying out of highway works.

7. Conclusion

- 7.1. This Planning Statement Addendum supports a current live planning application (ref. PL/24/1155) at the Site which is currently subject to determination. This Addendum should be read in conjunction with the submitted Planning Statement (August 2024).
- 7.2. In response to consultation feedback received during determination of the current live planning application, including direct officer feedback, the design of the proposed development has been amended to include a reduction from 215 to 170 Build to Rent homes, changes to building height and massing, updated elevation design and increased greening. The Revised Scheme thereby provides a positive response to the feedback received to further support the delivery of high quality development at the Site.
- 7.3. As the Addendum explains, the Site is a sustainable brownfield site which is identified as a draft allocation for residential 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 (including affordable and family housing) to meet local needs. There are wide-ranging and significant benefits of the proposed development supporting and delivering the overall objectives of the adopted Local Plan (2019) and emerging LPPU.
- 7.4. The proposed development would also support the Government's housing and economic development objectives, and key focus of increasing the supply of new homes in England, helping to meet the aims and objectives and deliver planning benefits across all three strands of sustainable development (economic, social and environmental).
- 7.5. As set out above, 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. The supporting technical information further demonstrates that the proposals are wholly acceptable based on the analysis undertaken.
- 7.6. The proposed development complies with the Development Plan as a whole and material considerations further support the conclusion that the proposed development should be approved without delay. The planning balance falls in support of granting planning permission and it is respectfully requested that the planning application is approved without delay.

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