

Our ref: Q250403
Your ref: PP-14093264
Email: james.guthrie@quod.com
Date: 19th June 2025



Alison Amoah
Reading Borough Council
Planning Department
Civic Offices
Bridge Street
Reading
RG1 2LU

By Planning Portal

Dear Alison Amoah

**Land to the South of the A33 Relief Road, Reading International Logistics Park,
Reading, RG2 6DA
Application under S96A of the Town and Country Planning Act 1990 (as amended)
for a Non-Material Amendment to PL/19/2054 (as amended by PL/21/0859 and
PL/22/0496)**

On behalf of JP Morgan and Graftongate (together 'the Applicant'), and further to our previous discussions, please find enclosed a non-material amendment ('NMA') application to planning permission PL/19/2054 (as amended by PL/21/0859 and PL/22/0496) pursuant to Section 96A ('S96A') of the Town and Country Planning Act 1990 (as amended) in relation to the above site ('the Site').

This application ('the Application') seeks approval for a NMA to planning permission PL/19/2054 (as amended by PL/21/0859 and PL/22/0496). The proposed alterations are required to address important safety and technical matters, alongside improvements in design aesthetic, as a result of final detailed design development since the Applicant acquired the Site from Arlington LP UK Limited in May 2025. This will enable delivery and enhance the marketability of the development and ensure alignment with the corporate branding of JP Morgan and Graftongate.

In accordance with best practice, the application has been submitted via the Planning Portal (PP-14093264). The requisite planning application fee of £383 (including the £85 service charge) has been paid to the Council via the Planning Portal.

1 Background

A detailed planning application (PL/19/2054) was submitted to Reading Borough Council ('RBC') by Arlington LP UK Limited on the 27th December 2019 and was granted full permission on the 14th April 2021. The approved Description of Development ('DoD') is copied in full below:



“Redevelopment to provide 15,080 sqm (GEA) of class B1(c), B2 or B8 floorspace in four buildings, with associated external yards, car and cycle parking, landscaping, and all related and ancillary works (amended)”

Following approval of the detailed planning permission a NMA was submitted and approved in July 2021 to *“amend the wording of Condition 18 to allow for the interim BREEAM Certificate to be submitted to and approved by the local planning authority no later than 6 months after commencement of development”* (ref: PL/21/0859). A further NMA was submitted to amend the wording of Condition 9 relating to an 8-metre-wide buffer zone, which was approved in September 2022 (ref: PL/22/0496).

Several condition discharge applications have been submitted and approved. The following conditions pursuant to planning permission PL/19/2054 have been discharged, including Condition 9 (ref: PL/21/2085), Condition 7 (ref: PL/21/1213), Conditions 3, 4, 5, 12, 14, 15, 16, 21, 32, 33, and Condition 34 in part (ref: PL/21/0704).

2 Proposed Amendment

Following approval of the detailed planning permission, the Applicant acquired the Site in May 2025 and has undertaken extensive due diligence and design development to address technical matters. The proposed changes seek to address discrepancies in site levels, substation locations and transformers, whilst also seeking to enhance marketability and align with corporate branding.

The proposed modifications have been carefully considered to ensure they do not comprise the integrity of the original planning permission and continue to support the economic and strategic goals of the Site.

To secure the proposed amendments, it is proposed to amend the approved plans listed in Condition 2 below pursuant to application PL/19/2054 (as amended by PL/21/0859 and PL/22/0496), as set out in **Annex 1** of this letter.

A summary of the changes proposed as part of this Application is set out below:

- **New pedestrian and cycle route**

A new pedestrian and cycle route is proposed from the northern junction to align with the adjacent landowners design philosophy and associated purchase order requirements. The footpath is proposed to be 3 metres wide where practical and will connect directly to the existing highway crossing point, ensuring safe and accessible integration with the wider movement network, improving active travel options in and around the Site.

- **Substation Relocation**

The relocation of the substation has been carefully coordinated with National Grid to minimise high voltage diversion works. The revised location provides level access and improved entry, significantly



reducing disruption to existing services during the transition and minimising operational impact during future maintenance. This minor amendment supports a more efficient and cost-effective implementation while maintaining the operational integrity and long-term resilience of the site.

- **Units 2, 3 and 4 Cycle Shelter Relocation**

The cycle shelter locations for Units 2, 3 and 4 have been repositioned to improve the Site circulation, align with the building canopy overhangs, and facilitate ongoing maintenance of the external facades. These adjustments ensure functionality while maintaining the aesthetic and operational efficiency of the development.

- **Transformer Relocation and Sizes**

The transformer locations and sizes have been updated in response to feedback from the mechanical and electrical consultants. These revisions optimise the layout by shortening cable routes and ensuring the transformers are appropriately sized to suit the individual unit requirements, thereby improving efficiency and reducing installation complexity.

- **Units 3 and 4 Parking Spaces Relocation**

Car parking spaces serving Units 3 and 4 have been relocated to accommodate the external compound and to improve vehicle manoeuvrability within the service yards. This amendment enhances operational efficiency and supports safer site logistics for these units.

- **Communal Cycle Shelters**

Ten communal bike hire spaces have been introduced to the development to encourage cycling and physical activity among employees. This amendment supports sustainable travel and promotes employee wellbeing.

- **Perimeter Building Footpaths**

The perimeter footpaths have been amended from structural grass to concrete to provide a stable and safe working platform for façade construction and to facilitate ongoing maintenance. This amendment improves practicality and long-term durability without altering the approved layout.

- **Unit 2 Additional Retaining Wall**

An additional retaining wall has been introduced to Unit 2 to optimise the usable yard space and assist with achieving a balanced cut-and-fill strategy, improving the sustainability of the build. This measure enhances both the functionality of the service yard and the overall efficiency.

- **Façade Treatment**

The façade treatment has been amended to align with the funders' branding, incorporating vertical solar shading fins and undercroft glazing to allow for potential office provision expansion in the future.



The fire escape doors have been repositioned to provide flexibility for future building fit-out requirements. The dock and level access door provisions have been retained as per the original consented scheme. The amendments the façade provide an improved design aesthetic for the development.

- **Unit 3 Roof Structure and Access**

The roof valley has been omitted to eliminate internal columns, thereby improving the usable internal space. A ship's ladder roof access has been incorporated to facilitate safe and efficient roof maintenance, ensuring compliance with health and safety requirements while minimising operational disruptions.

- **PV Provision**

Photovoltaic ('PV') provision has been added to the roof structure to align with BREEAM and the funders sustainability requirements, supporting the development's commitment to energy efficiency and environmental responsibility. While these works are achievable under permitted development rights, for completeness they are included in this NMA.

3 Justification

S96A of the Town and Country Planning Act 1990 (as amended) provides power to local planning authorities (in England) to make NMA's to planning permissions. Section 96A(2) states:

"In deciding whether a change is material a local planning authority must have regard to the effect of the change, together with any previous changes made under this section, on the planning permission as originally granted"

Further guidance on making a S96A NMA to planning permission is provided in the Planning Practice Guidance ('PPG') 2014 (as amended). When considering the definition of a NMA the guidance states:

"There is no statutory definition of 'non-material'. This is because it will be dependent on the context of the overall scheme - an amendment that is non-material in one context may be material in another. The local planning authority must be satisfied that the amendment sought is non-material in order to grant an application under Section 96A of the Town and Country Planning Act 1990".

The above amendments (considered as a whole) are minor in nature and are required to resolve technical discrepancies, improve safety and deliver an improved design aesthetic for the scheme. For the avoidance of doubt, these amendments have no material change to the effect of the original permission, or the remaining conditions attached to it.

It is therefore considered that the revisions represent a NMA to the proposal and will not conflict with the principles of the approved development or adopted planning policy including Local Plan **Policies**



CC2 (Sustainable Design and Construction) and **CC7** (Design and Public Realm) and should therefore be allowed, without delay.

On the basis of the above, it is considered that this Application is acceptable and should be approved without delay.

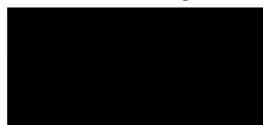
4 Drawing Schedule

A drawing schedule is provided at **Annex 1** of this letter which sets out the drawings hereby submitted, and the drawings proposed to be superseded as part of the previous application secured by Condition 2 as approved (PL/19/2054).

5 Summary

We trust that the enclosed information is sufficient to allow you to validate and consider this submission, however please do not hesitate to contact me or my colleague Hannah Swainston (hannah.swainston@quod.com) should you require any additional information at this stage.

Yours sincerely



James Guthrie
Director

enc. As above
cc. James Martyn-Smith (Graftongate)
Alex Thomason (Graftongate)



Annex 1 – Drawing Schedule

Submitted Drawings for Approval	Approved Drawings secured by Condition 2 of PL/19/2054 (to be superseded)
Location Plan 23545-UMC-SI01-SI-DR-A-0200(P01)	Location Plan 6204-60 Rev A
Proposed Site Layout 23545-UMC-SI01-SI-DR-A-0201(P02)	Site Layout Plan 6204-103 Rev C
Unit 1 Elevations and Section 23545-UMC-0100-XX-DR-A-0211(P01)	Unit 1 Elevations and Sections 6204-107
Unit 1 Building Plan 23545-UMC-0200-R1-DR-A-0222(P01)	Unit 1 Building Plan 6204-105
Unit 2 Roof Plan 23545-UMC-0200-R1-DR-A-0222(P01)	Unit 2 Roof Plan 6204-109
Unit 2 Elevations & Section 23545-UMC-0200-XX-DR-A-0221(P01)	Unit 2 Elevations & Sections 6204-110 and 6204-111
Unit 2 Gatehouse Plan & Elevations 23545-UMC-0200-XX-DR-A-0223(P01)	Proposed Gatehouse 6204-79
Unit 2 Building Plan 23545-UMC-0200-ZZ-DR-A-0220(P01)	Unit 2 Building Plan 6204-108
Unit 3 Roof Plan 23545-UMC-0300-R1-DR-A-0232(P01)	Unit 3 Roof Plan 6204-112
Unit 3 Elevations & Section 23545-UMC-0300-XX-DR-A-0231(P01)	Unit 3 Elevations and Sections 6204-113
Unit 3 Building Plan 23545-UMC-0300-ZZ-DR-A-0230(P01)	Unit 3 Building Plan 6204-69 Rev A
Unit 4 Roof Plan 23545-UMC-0400-R1-DR-A-0242(P01)	Unit 4 Roof Plan 6204-114
Unit 4 Elevations & Section 23545-UMC-0400-XX-DR-A-0241(P01)	Unit 4 Elevations & Sections 6204-115
Unit 4 Building Plan 23545-UMC-0400-ZZ-DR-A-0240(P01)	Unit 4 Building Plan 6204-72 Rev A



Proposed Site Layout - External Finishes 23545-UMC-SI01-SI-DR-A-0202(P01)	N/A
Proposed Site Layout - Site Section A-A & B-B 23545-UMC-SI01-SI-DR-A-0203 (P01)	Typical Illustrative Section A-A 1219 501 Rev P3 Typical Illustrative Section B-B RILP-MGS-ZZ-ZZ-DR-L-9502 Rev P02
Proposed Site Layout - Site Section C-C & D-D 23545-UMC-SI01-SI-DR-A-0204 (P01)	Site Section C-C and D-D 6204-124
Typical Cycle Shelter 23545-UMC-SI01-SI-DR-A-0250 (P01)	Typical Cycle Shelter 6204-77 Rev B
Typical Bin Store and Transformer Enclosure 23545-UMC-SI01-SI-DR-A-0251(P01)	Proposed Bin and Transformer Enclosure 6204-78 Rev A