

Planning Addendum

“Demolition of existing office and substation buildings and residential-led site redevelopment within 1-11 storey buildings comprising residential (Class C3) and ground floor commercial uses (Class E), together with various associated works including replacement pedestrian and vehicle access routes, car/cycle parking, hard and soft landscaping and a public open space adjacent to the river”.

Waterfront Square, Reading

29th October 2025

Contents

1.	Introduction	4
2.	Updated Planning Policy Position	7
3.	Changes to the Proposed Development	11
4.	CIL and Planning Obligations	29
5.	Conclusions	31

Appendix 1 – Briefing Note to NHS, re; Broad Street Mall expansion (confidential – submitted separately)

Appendix 2 – Engagement Overview – Post-Submission Meetings

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Client
Packaged Living Limited

Project
Waterfront Square

Our reference
OP-06-24

1. Introduction

- 1.1. This Planning Statement Addendum has been prepared by Opus Works Consultancy to respond to post-submission comments from statutory consultees, including Council Officers.
- 1.2. Given the emerging Local Plan Review, this document identifies the relevant policy position at the time of this submission and sets out compliance of the proposals in this regard.
- 1.3. This Planning Addendum also summarises the additional detail set out in the various reports submitted at this stage for Officers' consideration and identifies proposed S106 Heads of Terms regarding appropriate contributions to local infrastructure and services.
- 1.4. The proposed description of development, as agreed with Officers post-submission, remains as following:

“Demolition of existing office and substation buildings and residential-led site redevelopment within 1-11 storey buildings comprising residential (Class C3) and ground floor commercial uses (Class E), together with various associated works including replacement pedestrian and vehicle access routes, car/cycle parking, hard and soft landscaping and a public open space adjacent to the river”.

- 1.5. The detailed feedback provided by statutory consultees has enabled significant, beneficial changes to be identified and proposed within the updated planning submission, as set out in further detail in this report and the DAS. The changes can be summarised as:
 - Reduction in units from 254 dwellings (15 x studios, 105 x 1 bed, 116 x 2 bed, 15 x 3 bed) and 268 sqm commercial floorspace to 236 dwellings (22 x studios, 92 x 1 bed, 110 x 2 bed, 12 x 3 bed) and 240 sqm commercial floorspace
 - Ground floor - Norman Place increased by 1m in width. Access to car park improved, public square increased in size
 - Second to Seventh Floor - Block A1 reduced by 1m width with consequent increase to podium area. Core layouts updated to reflect changes to massing.
 - Fifth to Seventh Floor - Chamfer introduced to Block A1. Core layouts updated to reflect changes to massing.
 - Seventh floor - Block A1 reduced by 1 storey.
 - Eighth Floor - Block B2 reduced in length with consequent increase in accessible roof terrace (50% larger)

- Brick parapets replaced with railings
- Block B1 amended through an increase in the variety of materials and tones to break up the Norman Place elevation
- Block B1 - increased fluting detail provided to top floors of main block and metal detail added to window heads to visually enhance the crown of the building
- Throughout - additional checkerboard detail added to window heads
- Blocks A1 and A2 - greater detail provided to lower edge buildings on the river frontage to provide greater contrast with floors above.

1.6. This further submission of planning detail is supported by the following documents:

- Application Drawings, prepared by Assael Architects (see drawing register)
- Design and Access Statement (DAS) Addendum, including Landscape DAS, prepared by Assael Architects
- Updated Accommodation Schedule, prepared by Assael Architects
- Updated CIL Forms, prepared by Opus Works
- Planning Statement Addendum, prepared by Opus Works
- Biodiversity Net Gain Report, October 2025, prepared by The Environment Partnership (supersedes that previously submitted)
- Biodiversity Net Gain Calculation, October 2025, prepared by The Environment Partnership (supersedes that previously submitted)
- Drainage Strategy, October 2025, prepared by Hexa (supersedes that previously submitted)
- Energy Statement Addendum, prepared by Hoare Lea
- Fire Strategy – RIBA Stage 2, October 2025, prepared by Mars Fire Engineering (supersedes that previously submitted)
- Gateway 1 Statement, October 2025, prepared by Mars Fire Engineering (supersedes that previously submitted)
- Heritage Impact Assessment Addendum, prepared by Lichfields

- Internal Daylight and Sunlight and Overshadowing Addendum, prepared by GIA
- Townscape and Visual Appraisal Addendum, prepared by Lichfields
- Planning Statement Addendum, prepared by Opus Works
- Transport Addendum, prepared by Stantec
- Viability Addendum, prepared by CBRE
- Wind and Microclimate Addendum, prepared by GIA

1.7. This document provides an updated overview of the Proposed Development and sets out a robust justification in its support. This Addendum makes the case for the proposals as follows:

- Section 2 sets out the updated Policy position in light of the emerging Local Plan Review
- Section 3 identifies the changes made to the Proposed Development and summarises the technical assessment of these changes
- Section 4 provides a summary of updated CIL and proposed s106 planning obligations.
- Section 5 sets out our conclusions on the proposed development.

1.8. The additional details hereby submitted represent the culmination of significant post-determination engagement with statutory consultees, enabling a scheme to emerge that can be supported by Officers.

1.9. As part of the submission, great care and attention has been given to provision of a deliverable scheme in what are highly challenging economic headwinds.

1.10. Finally, and importantly, this further submission has continued to consider how to derive meaningful community benefit. The scheme proposals in this manner will transform the river frontage through provision of enhanced public realm that will be made available as performance space, delivery of non-residential space that can meet a local convenience need and by improving existing footpath and cycle path connectivity in the locality.

2. Updated Planning Policy Position

2.1 The Site is currently subject to the following designations, as defined in the Reading Local Plan 2019 and with reference to the approved planning policies map, the relevant extract of which is reproduced in Figure 1 below:

- Within the Borough Boundary;
- Within Central Reading (black line);
- Within the Central Core and the Office Core (pink and blue lines)
- Within an Air Quality Management Area (AQMA) (purple line)

2.2 The Application Site is also adjacent to the River Thames, which is identified as an Area of Identified Biodiversity Interest and a Major Landscape Feature (light and dark blue areas), an area of Public Open Space at Christchurch Meadow (green area), cycle routes (red lines), the classified highway network (yellow lines) and a primary retail frontage (green lines). Slightly further afield, are the Station Area Major Opportunity Area (black line covering areas to north and south of Vastern Road) and the Tall Buildings Cluster (grey area to the south of Vastern Road).

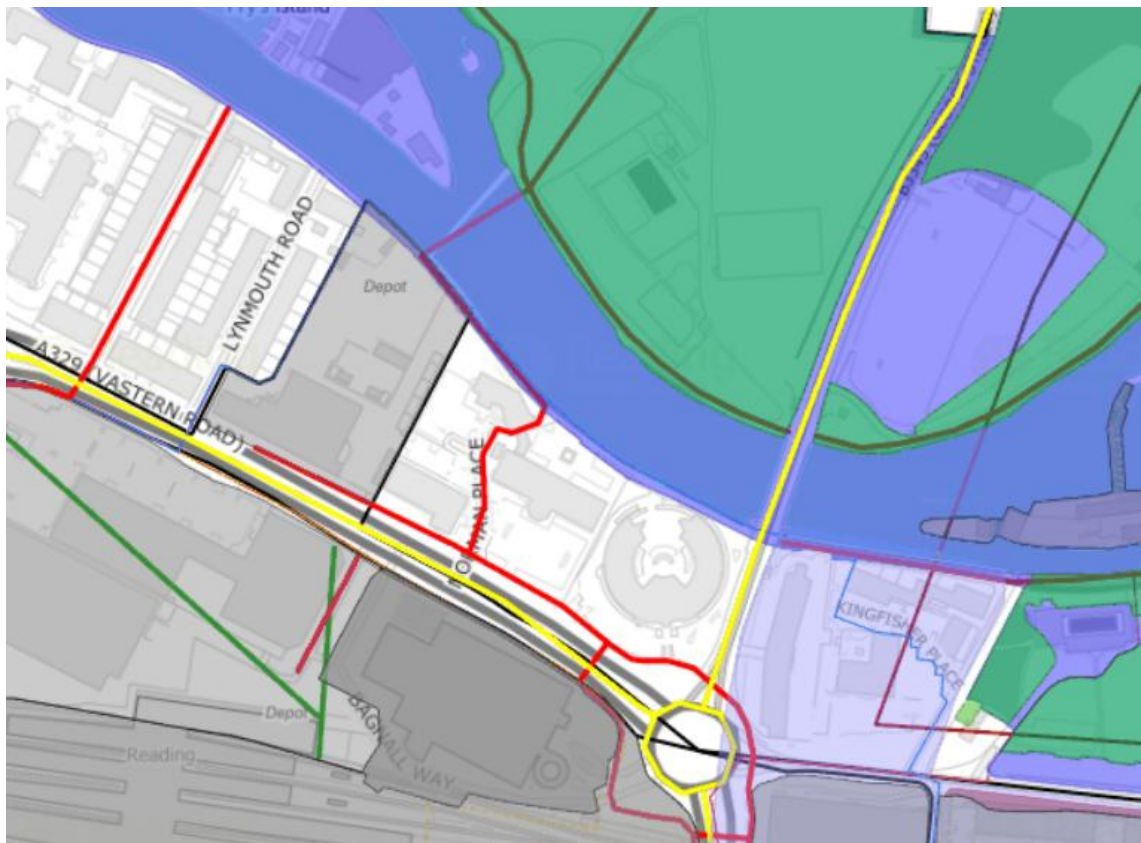


Figure 1: Local Plan Policy Map Extract

- 2.3 The Local Plan Partial Update (LPPU) has now been submitted to the Secretary of State for Examination in Public, which will take place in two stages; Stage 1, which will deal with Legal Requirements and Procedural Matters and Housing Need and Requirement, will take place on 11th and 12th November 2025. No timetable has yet been given for the Stage 2 Hearings, which will deal with specific planning policies and site allocations.
- 2.4 The current Local Plan Submission Version sets out a number of changes to policy, of which the following are highly pertinent:
- The site is allocated under Policy CR14v
 - The site is located within an Area 'Less Suitable for Tall Buildings' under revised Policy CR10
- 2.5 Policy CR14v identifies a theoretical site capacity of up to 190 dwellings (it is noted within the Local Plan that allocations do not represent a maximum) and sets out provisions to protect and enhance local transport and accessibility, landscape and ecology, environmental management and infrastructure considerations.
- 2.6 The revised Policy CR10 is highly relevant to the proposed development in that it seeks to extend the current three Tall Buildings Clusters in the central area with 'areas of less suitability for tall buildings', as shown on the updated Proposals Map, within which tall buildings will not be suitable unless a clear case can be made that the cluster approach would not be undermined when all significant views are taken into account and that all of the other aspects of the policy are complied with.
- 2.7 The updated Policy Map for the locality is provided overleaf, with the Policy CR14v allocation shown in grey and the extended Policy CR10 area depicted by a red dotted line. The black line which extends from the Policy CR11g allocation to the adjacent plot to the west denotes that it is an area identified for development or change, albeit the closest building has no formal policy allocation within the LPPU.
- 2.8 In more general terms, the LPPU has been progressed to provide for updated housing need requirements, these being based on the NPPF 2023, rather than the more onerous NPPF 2024 Standard Methodology. Notwithstanding this, the Council has sought to significantly increase housing delivery within the Borough from the current Local Plan position of 689 dwellings per annum (dpa).
- 2.9 At the time Reading BC consulted on its Regulation 19 Local Plan, the minimum housing requirement for the Borough, using the standard method (SM) and including the urban uplift, was 878 dpa.



Figure 3: LPPU Policy Map Extract

- 2.10 The LPPU was ultimately submitted in May 2025. In March 2025, revised/updated median work-place based affordability ratios were published, as documented in Examination Document EV013. When these most recent affordability ratios are applied to the SM calculation for Reading, the resulting need figure, as demonstrated in EV013 is stated to be 822 dpa. Against this, the LPPU is currently advocating a figure of 825 dpa, resulting in the proposed delivery of 14,850 dwellings in the extended plan period to 2041.
- 2.11 The emerging status of the LPPU means that policies currently carry limited weight. Nevertheless, they do identify the Council's proposed direction of travel in terms of policies directly relevant to the site and housing delivery in general.
- 2.12 Given that the changes to the proposals relate to minor reductions in built form, it is considered that the previous planning assessment remains relevant. As set out in supporting documents, the quality of the proposed scheme has improved and technical matters have been responded to appropriately. It is considered that the principle of development is supportable and that the scheme remains essentially policy-compliant with reference to land use, residential and amenity space standards, energy and sustainability, heritage and townscape, affordable housing and transport and servicing. Further details are provided within the supporting plans and documents submitted at this time, with this

summarised in the following section to demonstrate how comments from Officers and statutory consultees have been responded to.

3. Changes to the Proposed Development

- 3.1 As set out in paragraph 1.5 of this document, the design and layout have been subject to a number of changes to respond to comments from Design South East and Planning Officers.
- 3.2 The changes to built form principally relate to making the proposals meet expectations in terms of the quality of accommodation to be provided, including the internal living experience and to also ensure that built form sits appropriately within its context.
- 3.3 The original DAS, as submitted to the Council in July 2024, highlighted a number of design iterations leading up to the submission scheme. This included a response to pre-application comments from Design South:East, who were selected by the Council to run the Design Review Panel process.
- 3.4 Following submission, a further D:SE review was undertaken on 28th February 2025, with a report providing a number of recommendations provided on 14th March 2025. These initial recommendations have formed the general thrust of Officers' comments regarding design and layout, as provided on 4th April 2025 and 17th July 2025, and for which our considered response to which has culminated in the changes proposed is now provided.
- 3.5 The D:SE design recommendations can be summarised as:
1. Adopt a more contextually and environmentally response to massing, evolving a solution that maximises sunlight penetration into the central courtyard space and improves daylight levels in the single-aspect residential units facing it.
 2. Break the western flank of the building to allow more light into the central courtyard space and improve the elevation
 3. Reconfigure the floorplates and vertical circulation to reduce the need for double stacked corridors and to reduce the mass of the blocks.
 4. Enable the western wing, along the river frontage, to step down to the height of Thames Court.
 5. Amend the formal delineation of the cycle route to encourage cyclists to use the Norman Place carriageway.
 6. Refine the northern elevation that faces the Thames to acknowledge the different characters of the eastern and western wings.
- 3.6 As set out in Section 2.2 of the DAS Addendum, a series of options to best meet the D:SE recommendations were presented to Officers on 9th July 2025. Whilst Officers considered that positive changes had been made, it was considered that further work was still necessary, with six points to address being provided, as follows:

- Break down the length of block B1 by reducing the massing at the upper floors
 - Reducing the width of blocks A1 and B2 to provide more space along Norman Place and across the resident's podium garden
 - Refine the footprint of block A1, through use of a chamfered massing to reduce the width of the building further when viewed from the river
 - Increase the width of the podium
 - Increase the width of the footpath along Norman Place
 - Develop and enhance the architectural character
- 3.7 The subsequent design response is set out in Section 3.0 of the DAS Addendum, which sets out the key changes summarised in paragraph 1.2 of this document in more visual form.
- 3.8 Most recent correspondence with Planning Officers, dated 24th September 2025 has welcomed the further changes and has indicated that *'should all other outstanding matters, as predominantly discussed at our meeting on 9th July, come forward and be resolved satisfactorily, then an on balance positive officer recommendation will be able to be advanced for the proposed development'*.
- 3.9 It is considered that the design changes proposed are consistent with that requested by Officers and are therefore supportable.

Other Material Considerations

- 3.10 Whilst matters relating to built form and layout were being resolved, other technical considerations were held in abeyance. Given the position now reached with Officers it is now, however, appropriate to respond to comments provided by statutory consultees on other technical matters pertaining to this application.
- 3.11 A number of issues were raised during the planning process, requiring response from the Project Team. The origin of each comment is identified against each comment/issue raised, as set out below. The Project Team response is summarised below, with sources of further detail identified as appropriate:

Environmental Health

- Comment: (Email dated 9th January 2025) - Concerns were raised regarding potential noise and light pollution. A range of conditions were proposed to

adequately control these aspects of the development. The EHO further requested confirmation that all existing bollard lighting on site is to be removed

Response – the Applicant can agree to the conditions proposed and confirms all existing bollard lighting will be removed. All new external lighting is proposed to be subject to control via planning condition

Transport

- Comment: Active Travel England (ATE) has provided a standing advice response (email dated 11th December 2024), which is required to be considered by RBC Transport prior to determination.

Response – Stantec has provided a detailed response to the ATE standing advice, as set out in the Transport Statement Addendum (TSA) and the standalone planning application assessment spreadsheet. This identifies that the proposals pass the ten ATE criteria. As part of this process a Qualitative Walking and Cycling Assessment has also been produced and is submitted for review.

- Comment: Officers noted (9th July 2025 meeting) that the proposed scheme proposes cycle parking at the point at which the route from Norman Place meets the Towpath which is NCN Route 5. It was considered that the cycle stands could create an obstruction especially for cyclists traveling west along the Towpath and turning left towards Norman Place. It was further considered that the adjacent wall and landscaping could obscure visibility of the Sheffield stands especially when no bicycles are parked in this location.

Response - The updated landscaping drawings have been included within the updated submission pack, plan ref: A4012E-ASA-XX-00-DR-L-0200 Rev P4. Four Sheffield stands have been provided next to the steps from the Towpath, and three have been placed at the front of the building on Vastern Road.

Drawing 332610561-STN-HGN-XX-DR-H-0027 has also been provided alongside this response. It shows that cyclists travelling westbound along the towpath will have clear visibility of the Sheffield stands on the Towpath. Landscape Drawing A4012E-ASA-XX-00-DR-L-0201 Rev P2 shows the levels between the footpath and the public square with a c. 500mm height difference. Consequently, the landscape edge will not impede visibility.

- Comment: (email dated 11th December 2024) ...In line with DfT document Inclusive Mobility the proposed scheme has provided no ramp directly adjacent to the steps to allow for a convenient accessible route to this space. An alternative access is

provided that is located on Norman Place to the south, which is approximately 40m away from the stepped access...Where a ramp is necessary...its existence and location should be clearly indicated as a person approaches. If the beginning of the ramp cannot be located close to the accessible entrance, information should be provided at that point to direct users to the correct location. The text should be in large characters, contrasting visually with their background, and be accompanied by the International Symbol for Access. Should the applicant wish to propose this as the alternative a directional signage drawing would be required which can be dealt with by way of a condition to which the applicant has accepted.

Response - It is agreed that directional signage will be installed to direct users on the towpath towards the ramped access along Norman Place. It is proposed that this be included in the S106 agreement.

Drawing 332610561-STN-HGN-XX-DR-H-0006 P10 displays that the number of bins can be presented, providing sufficient space for a Fire Tender to pass without interaction with the presented bins. The tree previously within this area has been removed from the proposals.

Drawing 332610561-STN-HGN-XX-DR-H-0006B P08 has been provided with this response, which displays the refuse bins within the collection area, maintaining a 2.0m gap to allow access for those wanting to access the connection through to the river or to the public square.

- Comment: Officers (9th July 2025 meeting) have requested further detail regarding visibility from the site access onto Norman Place.

Response – Changes to design and layout on Norman Place have enabled the setback of building B2 from the Norman Place frontage, in doing so creating wider visibility from the car park. Further detail is set out in the TSA and plan ref: 332610561-STN-HGN-XX-DR-H-0022 Rev P04, Undercroft Car Park Access, Visibility and Changes.

- Comment: Officers (9th July 2025 meeting) have requested further information regarding the proposed car park shutter detail.

Response – Drawing 332610561-STN-HGN-XX-DR-H-0022 Rev P04, Undercroft Car Park Access, Visibility and Changes, shows the location of the shutter. It is proposed that the shutter be fast opening and linked to an ANPR/detection system so that as vehicles enter Norman Place, the shutter opens before vehicles are required to wait and block the footway/cycleway. This prevents the need for an

alcove that could cause an area for anti-social concern. Recommend that details of the control system can be conditioned

- Comment: Officers (9th July 2025 meeting) have requested a Highways Works Phasing Plan.

Response – A Highways Arrangement plan has been produced and is submitted for the Council's review. Please see plan ref: 332610561-STN-HGN-XX-DR-H-0025B Rev P04.

- Comment: In light of changes to built form and layout, updated tracking plans to identify required fire tender access as well as refuse collection and servicing to the retail unit need to be revised.

Response – Further to the changes made to the site layout a co-ordination exercise has been undertaken between Assael Landscapes and Stantec to ensure that the proposals continue to meet fire safety and delivery/servicing requirements. Please see plan refs: 332610561-STN-HGN-XX-DR-H-0006 Rev P11, Proposed Bin Store and ALP Tracking; 332610561-STN-HGN-XX-DR-H-0006B Rev P09, Proposed Bin Store and Collection; 332610561-STN-HGN-XX-DR-H-0021 Rev P08, Proposed Aerial Ladder Platform Access Routes; and 332610561-STN-HGN-XX-DR-H-0023 Rev P04, Proposed Servicing Area Vehicle Tracking.

Transport/Natural Environment

- Comment: Officers (9th July 2025 meeting) have requested more detail through to the rear of the site in terms of landscaping to understand levels and whether landscaping was in planters, raised tables, flush areas etc

Response – Assael Landscapes have produced updated Landscape Plans (refs: A4012E-ASA-XX-00-DR-L-0200 Rev P4 – Landscape Proposals, Ground Floor Plan, A4012E-ASA-XX-00-DR-L-0201 Rev P2 – Landscape Proposals, Ground Floor Plan, Levels Plan and A4012E-ASA-XX-00-DR-L-0202 Rev P3 – Landscape Proposals, Canopy Spread and Soil Volume Plan) to more clearly identify the nature and extent of landscape planting within the site and at its edges. The positioning of all landscaping has been subject to detailed co-ordination with Stantec to ensure that refuse collection, servicing and fire tender requirements are met.

- Comment: Officers (9th July 2025 meeting) require detailed plans to identify no obstruction to visibility from the proposed trees and signage on Vastern Road, plus no obstruction of signage by the trees

Response – Stantec has reviewed the latest proposals in context of the positioning of proposed trees and existing signage and street furniture on Vastern Road and have concluded that the proposals can be provided as envisaged without detriment to highway safety. Further detail is set out in the TSA and plan ref: 332610561-STN-HGN-XX-DR-H-0028 Rev P03, Signage Visibility.

- Comment: Officers (9th July 2025 meeting) have requested co-ordination with utilities providers is required to identify whether trees on Vastern Road can be provided.

Response – Work has been co-ordinated between Hexa, Assael Landscapes and Stantec to ensure that tree pits and appropriate native species can be planted in the vicinity of existing services on Vastern Road, see plan ref: A4012E-ASA-XX-00-DR-L-0202 Rev P3 – Landscape Proposals, Canopy Spread and Soil Volume Plan. Discussions will be progressed at detailed design stage with utilities providers regarding to determine whether the trees can be implemented as envisaged. In the event that trees are not capable of being planted it is proposed that a s106 contribution towards off-site planting in the local area (within the Council's ownership) is provided. Further details in this regard are set out in Section 4 of this document, which covers CIL and proposed s106 contributions.

Natural Environment

- Comment: Officers (9th July 2025 meeting) have requested that the Arboricultural Method Statement to be updated given trees on the Thames Path would be adjacent to cycleway widening works.

Response – the trees identified sit outside of the Applicant's red line. It is considered that these trees will be appropriately protected as part of the Construction and Environmental Management Plan (CEMP) process, which is to be conditioned.

Further, s278 works proposed on Council-owned land will set appropriate parameters to ensure adequate protection of the trees during construction and maintenance provisions following this. As set out in the Applicant's submission, there are no proposals to affect these trees and accordingly the Applicant welcomes appropriately-worded conditions and s278 clauses in this regard.

Regarding potential replacement of the trees, given that the existing Arboricultural Statement identifies that the existing Ash trees along the river edge (T22, T23 and Group G4) have a low likelihood of long-term survival due to their age and susceptibility to Ash dieback (*Hymenoscyphus fraxineus*), a successional planting

strategy has been considered to ensure continuity of canopy cover as these Ash trees decline.

The plan in Section 4.6 of the Landscape section of the DAS illustrates the location of these trees. Although categorised as Category C under BS 5837:2012, they play an important role within the Thames Tree Corridor, contributing to visual amenity, screening of existing buildings, and the ecological connectivity of the wider river-edge habitat.

The eventual replacement of all of the declining Ash trees (T22, T23 and G4) is proposed to maintain canopy cover and ensure long-term landscape continuity along the Thames corridor. This approach accords with Reading Borough Local Plan Policy EN14 (Trees, Hedges and Woodland) and the Reading Tree Strategy (2018–2030), which seek to protect and enhance the Borough's tree cover. Replacing these trees with suitable native species will sustain their visual and ecological functions, support biodiversity net gain in line with Policy EN12, and contribute to a resilient, climate-adaptive tree structure consistent with the Council's green infrastructure objectives.

The trees are situated beyond the site boundary and outside of the applicant's ownership. Funding for replacement planting is therefore proposed through a Section 106 contribution as set out in Section 4 of this document.

- Comment: Officers (note dated 24th December 2024) identifies that green roof provision is very limited (blue-green roofs are not considered), the link to tree pits is in rain gardens only (hydro tree pits are available) and there is no mention of storage attenuation tanks, i.e. those that can be used to store and re-use water for landscape maintenance to reduce the use of potable water for this purpose (important given predicted droughts to avoid landscape failure).

Response - Blue-green roofs have previously been discounted due to additional load they impose on the structure and subsequent increase in cost due to the storage of storm water at higher level.

Green and brown roofs have been opted for in areas where they are anticipated to thrive (shade tolerant mixes to be considered where applicable) but not increase substantial loading to the structure as the green roof will slow the roof run-off (as it passes through the medium) but not store it.

Hydro tree pits have now been proposed through cell voids as seen on landscaping drawing 'A4012E-ASA-XX-00-DR-L-0230.

- Comment: (note dated 24th December 2024) Drainage Strategy drawing Rev P04 in Appendix H shows only rain gardens. With regards to green roof extent, it directs us to landscape drawings (no specific plan cited)

Response - The extents of the green roofs proposed can be found on landscaping drawing A4012E-ASA-XX-00-DR-L-0230 and Hexa drawing 7 00135-HEX-ZZ-ZZ-DR-C-9202 Rev P07.

- Comment: (note dated 24th December 2024) When comparing this to the tree planting, as shown on A4012E-ASA-XX-00-DR-L-0200 Rev P1 - Landscape Proposals Ground Floor Plan, there appears to be a link to tree pits only where they are within rain gardens:

Response - Within the updated landscaping design, tree pit cell voids have been proposed to interconnect tree planting. This can be found on landscaping drawing A4012E-ASA-XX-00-DR-L-0202 Rev P3.

- Comment: (note dated 24th December 2024) In terms of landscape led SuDs (the default in Policy EN18), the proposals appear to consist of only a very limited green roof area, and links to the rain garden areas. This is disappointing and further consideration should be given.

Response - Green and brown area has been increased to maximise habitat and urban greening opportunity, whilst maintaining access requirements for maintenance of roof plant. There are now substantial green and brown roof areas proposed measuring 149m² (biodiverse green roof) and 336m² (brown roof) as well as 82 sqm of rain garden planting. This is as set out in Section 4.11 Softscape Strategy of the Landscape Section of the DAS and plan refs: A4012E-ASA-XX-00-DR-L-0230 Rev P2, Landscape Proposals Roof Plan, and A4012E-ASA-XX-00-DR-L-0200 Rev P4, Landscape Proposals Ground Floor Plan.

Lead Local Flood Authority

- Comment: (email dated 27th January 2025) As stated previously the principle of the SuDs design is acceptable given that the proposal would result in a reduction in run off from the site. However, the latest set of drainage drawings do not appear to correspond with the latest landscape design and also include rain gardens located within residential properties; this must therefore be clarified.

Response - The drainage drawing has been updated, ref: 7 00135-HEX-ZZ-ZZ-DR-C-9202 Rev P07 to coordinate with the latest landscaping and ensure the highlighted SuDS areas are in the correct location.

- Comment: (email dated 27th January 2025) Although rain gardens are proposed at the ground floor level there would appear to be even more scope to connect into the landscaped areas, in particular the new landscaped area along the western elevation and the numerous trees that are provided along the western and northern boundaries.

Response - Within the landscaping proposals, cell voids have been proposed to interconnect the proposed tree pits as seen on drawing 'A4012E-ASA-XX-00-DR-L-0202 Rev P3. This includes areas on the western and eastern elevations, as well as through the significant public open space to the north of proposed built form.

- Comment: (email dated 27th January 2025) The proposed scheme included landscaped areas at terrace level, and the maintenance and management plan makes reference to a green roof. However, the drainage drawings do not illustrate a green roof or how the terrace level could in fact aid the reduction in surface water run off.
- Response - The proposed drainage system is intended to collect surface water run-off from roof areas through rainwater pipes at ground floor level. The areas of green and brown roof, which have been substantially increased, can be found on landscaping drawing A4012E-ASA-XX-00-DR-L-0230 Rev P2.

In areas where there are green and brown roofs, the surface water run-off rate will be reduced due to the roof build up having a permeable filter medium that will allow the percolation of roof water before entering the main drainage system.

- Comment: (email dated 27th January 2025) Although requested previously, the applicant has also still not provided any drawings identifying the exceedance routes to contain water within the site when surcharging / flood risk occurs.

Response - An exceedance route drawing has been provided in '700135-HEX-00-XX-RP-C-0005-P09 Drainage Strategy'.

- Comment: (email dated 27th January 2025) A planning condition is proposed to control the SUDs Strategy, as follows *'No development shall commence on site until a Sustainable Drainage Strategy and associated detailed design, management and maintenance plan of surface water drainage for the site using SuDS methods has been submitted to and approved in writing by the Local Planning Authority. The plan shall include: i. a timetable for its implementation, and ii. a management and annual maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory*

undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime.

REASON: These details are required due to insufficient information being contained within this submission and in order to reduce the risk of flooding onsite or elsewhere in accordance with Policy EN18 of the Reading Borough Local Plan 2019'.

Response - Concerns regarding the SuDS strategy have been addressed in the submissions now being made. For the maintenance requirements, each proposed SuDS element has been addressed within document '700135-HEX-00-XX-RP-C-0005-P09 Drainage Strategy.

Culture and Placemaking

- Comment: Officers (email dated 23rd December 2024) have forwarded a strategy with on-site use of public space for events and financial contributions envisaged to cover requirements.

Response – the Applicant can commit to use of the public space adjacent to the river as event space as requested. The applicant can further commit to provision of on-site wayfinding and public art. Pertinent detail is set out further in Section 4 on s106 contributions.

Energy and Sustainability

- Comment: (Email dated 13th October 2025) The Council's Sustainability Manager has significant concerns over the proposal using electric panel heaters, given they are inefficient and leaves the Council open to electricity network challenges – your resistance to future heat network connection is not accepted or considered acceptable. Instead, officers consider that your approach should provide all heat via heat pumps – it is considered that the standard approach for heat network ready is a centralised ASHP with connection points installed at the base.

Response – The April 2025 'District Heating Connection Note' provided a robust response on this matter. To reproduce those findings:

1. Investigations confirmed that there was no district heating system within the local area.
2. Whilst there is suggestion within the emerging Local Plan for future developments to consider connectivity to a District Heating Network, it is

unknown when connectivity would be available or indeed whether this is at all deliverable, both practically and/or financially.

3. It is considered that the deliverability of the Network would be extremely low having reviewed the significant infrastructure and associated funding that would be required to be delivered by the Local Planning Authority to facilitate connection between the 'central core' of the network and the Site
4. The likelihood of the proposed development having the opportunity to connect to a District Heat Network is therefore low, especially given the Site is located outside of the central area.
5. A key fundamental driver that determined the selected strategy (local heat pump for domestic hot water and electric space heating) was also the limited availability of the electrical supply serving the local area. A rigorous process was undertaken with the local network operator (SSE) and they confirmed power was limited to less than 1 MVA which would not have been sufficient to serve a centralised heat network with Air Source Heat Pumps (ASHP's).
6. Based on the above approach of a decentralised strategy, and the fact that there is no evidence that an area wide District Heating Network will be forthcoming, there is no benefit in allowing spatial provisions for a future connection.
7. A centralised heat network within the development would also require considerable external (roof top plant) and internal space for central plant & distribution which when reviewed had a significant impact on the overall massing and appearance of the development, which would result in considerably reduced numbers of residential units, putting further pressure on the viability of the proposed development.
8. Due to the nature of the development, it also became apparent that connectivity would result in unsustainable operating costs, maintenance responsibilities and capital cost which would have had an impact on the overall developments viability.
9. The end user (private renters) would experience the impact of this as this would drive rents higher.
10. As demonstrated in the Energy Strategy, the development will generate significant carbon savings that exceed the minimum requirements set out in the Building Regulations and planning policies as shown below.

11. Connecting to a future District Heating Network would create have an unknown impact on CO2 emissions meaning the scheme would be undeliverable as long-term Funders need certainty on ESG

The above findings are consistent with submissions made in respect of Broad Street Mall (PL/24/0173) and John Lewis (PL/24/1155), both of which have been consented without necessarily needing to provide a DHN compatible system.

In this regard, and more specifically to this application than those cited above, it is identified that Policy CC4 is very clear that flexibility is in-built to policy to ensure that the inclusion of decentralised energy provision within the site is only appropriate where it is *suitable, feasible or viable*.

In this case, there are myriad reasons for not progressing with a DHN connection. Irrespective of the lack of existing connection and low likelihood of this coming forward, the fact remains that the lack of electrical capacity and the fundamental impact on the ability to deliver the scheme given the loss of residential floorspace that would result are clear reasons why provision of a system that would connect into the DHN is not suitable, feasible or viable.

The thrust of Council policy, as set out in Policies CC3 and H5 is to adapt to Climate Change and to achieve delivery of zero carbon homes, which this scheme will achieve through the proposed strategy and associated carbon offset payment of £94,728.56 should a flexible, rather than prescriptive approach be taken to housing delivery.

It is not considered necessary, given very clear differences in the development circumstances applicable to this development in relation to Broad Street Mall or John Lewis, but should the Council consider it necessary the Applicant is willing to accept a s106 condition similar in approach to that agreed at Broad Street Mall in respect of this particular matter.

Inclusive Access

- Comment: Further comments (email dated 20th December 2024) were provided by the Access Officer in relation to step-free access, inclusive play equipment and inclusive transport.

Response – the scheme is designed to be almost entirely step-free, enabling inclusive access throughout the building. The play strategy can include for inclusive play equipment on site.

NHS

- Comment: A healthcare contribution of £219,000 is requested by the NHS (email dated 2nd December 2024).

Response – The contribution of £219,000 is based on a ratio of 2.4 residents per unit multiplied by £360 (219,000 / 360 / 2.4). On the basis of a reduction to 236 units, the NHS calculation should reduce to £203,900. As noted in the ICB response, the contribution seeks financial assistance towards improving capacity at the Reading Walk-in Clinic in Broad Street Mall, which is identified as ‘over capacity’. The NHS response, however, does not recognise that:

1. Not all residents will be ‘new’ and not all residents would therefore result in additional demand for primary healthcare in the ICB.
2. The ICB is allocated funds based on patient numbers, meaning that there will not be any shortfall in long-term patient funding, but this does not necessarily recognise the need for improvements to or expansion of existing facilities or potentially temporary shortfalls in budget whilst new patient funds are allocated to facilities.
3. Notwithstanding this, it is recognised that the Reading Walk-in Centre is identified for significant expansion, funded through the provision of an adjacent unit in the Broad Street Mall as part of PL/24/0173, which received Resolution to Grant earlier in 2025 and for which the s106 is currently being finalised. As part of submissions to the Council made by Opus Works on behalf of McLaren in respect of the scheme at Broad Street Mall, it was recognised that the additional floorspace provided through expansion of the Walk-in Centre unit would enable an increase in capacity of c. 25% or c.3,500 residents with this increase being recognised as being capable of accommodating the resident yield from the Broad Street Mall, Greyfriars House, The Oracle (or John Lewis) and Norman Place developments, see 12th March 2025 Briefing Note to NHS (Appendix 1 – to be submitted confidentially).
4. Further, the decisions at both Greyfriars House, ref: PL/24/1155 and Broad Street Mall, ref: PL/24/0173 evidence a reduction in financial contribution over the ICB’s standard approach.- Greyfriars House was reduced from an initial request of £224,640 to £86,400 (289 residents, based on accommodation schedule – 223 small 1 bed rooms (1 person) and 23 large 1 bed rooms 2(2 persons)). Broad Street Mall was reduced from £555,552 (based on the ICB standard approach for 643 units) to the provision of the extended Walk-in Centre or a financial contribution of £350,000 should this fall away.

5. In consideration of the capacity issued being sufficiently resolved by the Broad Street Mall development, the fact that not all residents will be new to the development and in recognition of the reduction in financial contributions being agreed at Greyfriars House and Broad Street Mall, it is considered that a consistent approach would be to offer a financial contribution of between £128,327 and £169,213, based on a yield of 566 residents (236 units x 2.4 person yield). This calculation is made on the following basis: (Greyfriars House - £86,400 / 289 * 566 = £169,213), (Broad Street Mall - £350,000 / 1543 * 566 = £128.387).
6. The updated Schedule of Accommodation identifies the following mix and therefore person yield (in brackets) – 21 x 1B Studio (21), 76 x 1B1P (76), 17 x 1B2P (34), 102 x 2B3P (306), 8 x 2B4P (32), 12 x 3B5P (60). Total person yield = 529 residents. This represents 93.46% of the standard calculation (236 units x 2.4 persons = 566 residents). Taking the higher of the two agreed calculations above, i.e. for Greyfriars House, it is considered that a financial contribution of £150,000 is appropriate to this development, with this relating closely to actual resident numbers rather than on a per unit basis.
7. Whilst the above figure does not represent the full contribution requested by the NHS, it is again reiterated that not all residents will be new to the area. Importantly, residents will be allocated budget by the NHS upon registration and so any financial shortfall relates solely to potential capacity to cater for what will be limited new residents (27% net additional according to 2021 Census migration patterns (NOMIS, 2021)).
8. Further, the planning obligations tests set out in paragraph 58 of the updated NPPF, December 2024, clearly recognise that these must only be sought where they meet all of the following tests:
 - a) necessary to make the development acceptable in planning terms;*
 - b) directly related to the development; and*
 - c) fairly and reasonably related in scale and kind to the development’.*
9. Whilst it is conceded that the planning obligations requested meet criteria a) and b), the quantum of contributions sought by the NHS is challenged on criterion c) on grounds that:
 - Capacity is to be provided through an extended unit at Broad Street Mall

- Notwithstanding this, agreed contributions towards the provision of NHS services at Broad Street Mall, Greyfriars House and most recently John Lewis. in tandem with that now offered at this development will allow for aggregated contributions to deliver either an expanded unit and at least £391,432 in financial contributions (based on agreed provision at Broad Street Mall, Greyfriars House, John Lewis and this site) or financial contributions of £741,432 in the case that Broad Street Mall provides a £350,000 financial contribution in lieu of the extended unit.

Leisure and Open Space

- Comment: Contributions of £125,000 (Open Space) and £298,242 (Sports and Recreation) are requested by the Council's Active Reading Manager (email dated 21st January 2025).

Response – there is substantial open space to be provided on site, which measures 1,404 sqm in area, representing 5.95 sqm per unit. The quantum of open space per unit is higher than that proposed at the most recent consented and comparable developments, Broad Street Mall (5.52 sqm) or John Lewis (2.6 sqm). The private amenity space offers a wide range of uses, including for relaxation, socialising and play.

The above figure does not include the substantial area of Public Open Space (947 sqm) that will be provided adjacent to the river frontage and, in line with requests from Community and Placemaking Officers, will be made available for use as event space for up to 12 days per calendar year.

In addition, unlike Broad Street Mall and John Lewis, the application site is in very close proximity to very substantial public open space and play facilities, this being within 0.2 miles and less than 5 mins walk.

It is considered that the proposed on-site open space requirement meets RBC policy requirements and in light of the on-site amenity space and public open space provision, no financial contribution is appropriate in this instance.

In light of the viability constraints facing the scheme, it is also considered that no contributions towards Sports and Recreation are necessary. This is contended on grounds that all RBC Sports and Recreation facilities in the locality are fee paying and as such the additional footfall will provide a tangible benefit to existing facilities, without the need for further subsidy.

Secured by Design

- Further information required regarding user experience and security in relation to compartmentation, including more details regarding on-site security.

Response – A Property Management Strategy, dated December 2024, has been supplied to the Council for review previously. It is intended that this document can be further developed at detailed design stage with this requirement secured by an appropriately worded planning condition.

Non-Residential Uses

- Officers (email of 17th July 2025) have requested advice regarding the full extent of Class E uses sought in respect of the non-resi uses.

Response – it is considered that the following Class E uses are appropriate to this application:

- E(a) Display or retail sale of goods, other than hot food
- E(b) Sale of food and drink for consumption (mostly) on the premises
- E(d) Indoor sport, recreation or fitness (not involving motorised vehicles or firearms or use as a swimming pool or skating rink,)
- E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)
- E(f) Creche, day nursery or day centre (not including a residential use)

Wind/Microclimate

- Comment: (Email of 13th October 2025) A Wind and Microclimate Addendum is required to confirm what impact (if any) the anticipated changes to the scheme would have on these matters.

Response – Figures 01 and 02 compares the safety exceedance of the planning submitted scheme and addendum scheme. Figures 03 and 04 compares the winter comfort conditions of the planning submitted scheme and addendum scheme. Figures 05 and 06 compares the summer comfort conditions of the planning submitted scheme and addendum scheme.

The figures show that the ground level conditions remain as was reported within the planning submitted report. No safety exceedances are introduced and there is a negligible difference in the winter and summer comfort conditions.

Wind conditions on the terraces remain consistent (some areas are slightly calmer and some areas are slightly windier) with the conditions reported in the planning submitted report. As with the planning submitted report there is a highly localised region of S15 exceedance at the south west of level 8 communal terrace. As in the planning submitted report, the balustrade in this area will be solid which will mitigate the very localised winds.

On this basis the conclusions in the planning submitted report remain valid, and the wind conditions remain suitable for use.

Ecology

- Comment: An updated BNG Assessment is required to take account of on-site changes

Response – The revised scheme proposals identify a net gain of 23.14% which equates to 0.23 Biodiversity Units (BU) for area-based habitats. A result of Not Applicable is returned for linear habitats, although a net gain of 0.16 BU is achieved (this is because a hedgerow percentage will not show as there is no hedgerow within the baseline to gauge comparison).

Although there will be no change in watercourse units as a result of the proposals, as the on-site baseline contains watercourses, a 10% net gain in watercourse units will need to be demonstrated. The on-site watercourse baseline provides 0.19 units. In order to deliver a 10% net gain, an additional 0.01 watercourse units are required to be delivered by the proposals, either on-site or off-site.

The Trading Rules are satisfied. Implementation, Management and Monitoring

Fire Strategy

- Comment: An updated strategy is required to assess scheme changes

Response – An updated outline RIBA Stage 2 fire strategy has been produced and follows the guidance of BS 9991 which is considered suitable for this stage of design development, with further development and coordination required at during subsequent design stages. An updated Gateway 1 Statement is also provided for the Council's consideration.

Viability

- Comment: An update is required to capture scheme changes and the revised financial position of the scheme.

Response – A Viability Appraisal has been undertaken which concludes that, supported by national planning policy and guidance, given the commercial risks, it would be CBRE's recommendation that the Proposed Development does not incorporate any affordable housing units (or a payment in lieu of on-site provision) and any sums towards planning obligations.

The commercial decision whether to proceed with the scheme and/ or make a concessionary without prejudice offer towards affordable housing provision will therefore be at the discretion, and risk, of the Applicant.

4. CIL and Planning Obligations

Community Infrastructure Levy

- 4.1 CIL is a tariff chargeable by Reading Borough Council on new development following 1 April 2015. In relation to the Site, CIL is charged at £120 per sqm (GIA), as indexed, currently £183.96 for C3 Use Class and £0 for the Class E uses proposed.
- 4.2 The Proposed Development is therefore CIL liable and a CIL payment would be made as part of the Proposed Development. Details of proposed area liable for CIL, alongside those areas subject to demolition that can be deducted from calculations have been provided as part of this application.

S106 Obligations

- 4.3 The scope of any prospective Section 106 Agreement will be subject to further detailed discussions during determination of the application. The Planning Obligations secured through S106 Legal Agreement will be a material consideration to which weight should be attached provided that meet the tests set out in Regulation 122 (2) of the Community Infrastructure Levy Regulations 2010 (as amended), which are:
- 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.
- 4.4 The Council has an adopted Planning Obligations under Section 106 SPD (April 2015), which alongside that discussed at pre-application phase has helped form the proposed draft Heads of Terms, as set out below:
- 12.5% On-site affordable housing provision comprising 10% at LHA (24 units) and 2.5% at 80% DMR (6 units);
 - Provision of an off-site planting strategy for the two proposed trees on Vastern Road or an in-lieu contribution of £3,200;
 - £6,000 towards replacement planting for the existing Ash Trees adjacent to the Thames Path;
 - Implementation of a Community and Public Art Strategy that includes a wayfinding scheme;
 - Provision of the ground floor public realm facing the River Thames as performance/event space for up to 12 days per year;
 - £150,000 towards support of existing NHS Healthcare Services in the local area;

- Provision of a car club on site for a minimum of five years;
- An Employment, Skills and Training contribution of £50,982.50
- Implementation of the scheme Travel Plan;
- £94,728.56 towards the Carbon Offset Levy; and
- £8,000 towards S106 Monitoring and Solicitors Costs.

4.5 The negotiation of the above detailed obligations, which sit separately to CIL, will have regard to all relevant site specific constraints and considerations and the overall viability of the Proposed Development.

4.6 These Draft Heads of Terms are provided without prejudice.

5. Conclusions

- 5.1 This Planning Statement Addendum has been prepared by Opus Works Consultancy to accompany a detailed planning application for:

“Demolition of existing office and substation buildings and residential-led site redevelopment within 1-11 storey buildings comprising residential (Class C3) and ground floor commercial uses (Class E), together with various associated works including replacement pedestrian and vehicle access routes, car/cycle parking, hard and soft landscaping and a public open space adjacent to the river”

- 5.2 This further planning submission has been submitted further to extensive, positive and proactive engagement with Council Officers and Members, statutory consultees, local stakeholder groups and local residents and businesses, which has helped positively mould the proposals submitted for consideration.
- 5.3 A summary of the post-submission meetings held with local stakeholder groups forms Appendix 2. The Project Team has taken great pride in ensuring that the scheme can meet the competing requirements of the various heritage, community and political representatives engaged over an almost three year planning process culminating in the well-considered, high-quality proposals now before the Council for final determination.
- 5.4 It is considered that the updated proposals provide a technically and financially deliverable scheme that will transform the Vastern Road area and associated river frontage, bringing new life and vibrancy through the delivery of a striking new residential-led development alongside significant, meaningful public realm and urban greening in an area currently subject to some building vacancy and anti-social behaviour issues.
- 5.5 The Proposed Development will also engender greater surveillance and use of the locality, creating greater footfall through activity associated with the public realm and Class E floorspace. Local pedestrian and cycle paths will be enhanced as part of the proposed works.
- 5.6 The latest proposals accord with a range of current policy and legislation requirements in respect of *inter alia* fire safety, unit sizes and daylight and sunlight and also responds appropriately to existing and emerging Council policy ambitions, particularly with reference to housing delivery and provision of family accommodation.
- 5.7 The Proposed Development has been subject to significant design review and amendment, complemented by a range of technical and environmental assessments to bring forward a high-quality and innovative landmark scheme which reflects the river borne environment in which it is located, but ensures that local amenity and the surrounding environment is protected and, where possible, enhanced.

- 5.8 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 5.9 Upon review of the various materials forming this updated submission package, it is concluded that the Proposed Development satisfactorily complies with the policies of the Development Plan and that although the development does not comply with every policy it is compliant with the Development Plan as a whole and it is therefore respectfully requested that the Council grant consent for the Proposed Development without delay.

Appendix 1 – Briefing Note to NHS re: Broad Street Mall expansion (Confidential)

Appendix 2 – Engagement Overview – Post-Submission Meetings

This addendum to the Statement of Community Involvement has been prepared by Cratus Group on behalf of the applicant. The following engagement has been undertaken following the original submission of the planning application in October 2024.

Stakeholder	Date	Summary
Commando Jugendstil	5 th February 2025	Meeting with Commando Jugendstil to discuss the installation of a sustainable community art feature/sculpture at the site.
Reading Civic Society	12 th March 2025	Meeting with Reading Civic Society to provide an update on the submitted application and gather feedback on the options for a community art installation at the site.
CADRA (Caversham & District Residents Association)	25 th March 2025	Meeting with CADRA to provide an update on the submitted application and gather feedback on the options for a community art installation at the site.
RISC (Reading International Solidarity Centre) and Food4Families	16 th May 2025	Meeting with RISC and Food4Families to provide an update on the submitted application and gather feedback on the options for a community art installation at the site.
Thames ward councillors	16 th May 2025	Meeting with Thames ward members to provide an update on the submitted application and gather feedback on the options for a community art installation at the site.
	17 th September 2025	Meeting with Councillor Richard Davies to provide an update on the submitted application and changes to the proposals as a result of engagement with officers.
	1 st October 2025	Meeting with Councillor Ama Asare to provide an update on the submitted application and changes to the proposals as a result of engagement with officers.
Lead Councillor for Planning & Assets	29 th August 2025	Meeting with Councillor Micky Leng to provide an update on the planning application and discuss changes made to the scheme as a result of officer engagement. The meeting also discussed the suggested pathway for the application to determination at Planning Applications Committee.

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