

## DELEGATED APPLICATION REPORT

Ward: Whitley Ward

App Ref: PL/26/0017 Non-Material Amendment

Address: Reading International Business Park, Land to the South of A33 Relief Road, Reading, RG2 6AA

Proposal: Minor amendment to planning permission 192054 to amend the wording of condition 19 – Final BREEAM to change the submission trigger (amended)

Applicant: JP Morgan and Graftongate

Received date: 08/01/2026

Target Decision date: 09/02/2026 (Ext)

**Case Officer: Alison Amoah**

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**Proposal:** The proposal is to amend condition 19 related to the submission and approval of a final BREEAM. The amendment sought relates to the trigger point and is as follows:

Existing condition 19:

19. Prior to first occupation of the development hereby approved, a copy of a Final BREEAM Certificate in accordance with the BREEAM Sustainability Standard following a post-construction stage review carried out by a licensed assessor has been submitted to and approved in writing by the Local Planning Authority, demonstrating that the development has attained as a minimum the standard set out in the Interim BREEAM Certificate referred to in condition 18.

REASON: To ensure that the development is carried out in accordance with sustainable building standards in accordance with Policy CC2 and H5 of the Reading Borough Local Plan 2019.

Proposed condition 19:

19. **Within 6 months of the first occupation** ~~Prior to first occupation~~ of the development hereby approved, a copy of a Final BREEAM Certificate in accordance with the BREEAM Sustainability Standard following a post-construction stage review carried out by a licensed assessor has been submitted to and approved in writing by the Local Planning Authority, demonstrating that the development has attained as a minimum the standard **of Very Good** ~~set out in the Interim BREEAM Certificate~~ as set out ~~referred to~~ in condition 18.

The applicant has advised in their submitted letter prepared by Engineering Consultancy Services Ltd, ref: ETR-ESS0449-HR01, dated 17th December 2025, that the reasons for the proposed alteration are that:

*"The Final BREEAM Certificate is based on verified as-built information and formal evidence of construction completion." "The Final BREEAM assessment cannot be completed prior to Practical Completion and initial occupation, as it relies on information and documentation that is not available until the building is fully constructed and operational. This includes, but is not limited to: As-built drawings and specifications; Commissioning records and test certificates; Final airtightness testing and building performance data; Building user guides and handover documentation; Waste transfer notes and construction stage evidence; Confirmation of installed systems and materials; and Photographic evidence of completed works." They advise that "in practice, much of this information is only collated and issued in the weeks following Practical Completion as part of the formal handover and close-out process. It is therefore not possible for the BREEAM Assessor to complete, submit, and obtain certification in advance of occupation." In addition, they highlight that "the BREEAM certification process itself has inherent timescales. Once the Final assessment is submitted by the Assessor, it must undergo independent Quality Assurance (QA) by BRE Global. This QA process typically takes several weeks and may require clarifications or further information to be provided before certification can be issued. These timescales are outside the control of either the applicant or the Assessor." They consider that "the requested period of up to six months following first occupation provides a realistic and reasonable allowance..." for the above actions.*

**Objections Received (Summary):**

Applications under S96A are not applications for planning permission, so are not covered by the publicity requirements, as set out in the DMPO.

**Relevant Planning History:**

**192054/FUL** - Redevelopment to provide 15,080 sqm (GEA) of class B1(c), B2 or B8 floor space in four buildings, with associated external yards, car and cycle parking, landscaping, and all related and ancillary works (amended) - Approved 14/4/2021

**210859/NMA** - Non-Material Amendment to application 192054 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 – Agreed 26/7/2021

**211313/APPCON** - Application for approval of details reserved by condition 7 (Trees) of application 192054 – Agreed 4/2/2022

**220496/NMA** - Non-Material Amendment to amend the wording of Condition 9 of planning permission 192054, to provide for the additional word 'target' minimum 8-metre wide buffer zone – Agreed 9/9/2022

**212085/APPCON** - Application for approval of details reserved by condition 9 of application 192054 – Agreed 21/11/2022

**210704/APPCON** - Application for approval of details reserved by conditions 3, 4, 5, 12, 14, 15, 16, 21, 31, 32, 33 and part discharge (construction period) of condition 34 of application 192054 – Agreed 1/12/2022

**PL/25/0889/NMA** - Minor amendment of condition 2 of planning permission PL/19/2054 for amendments to locations of parking spaces, cycle shelter, transformer and substation, and new cycle/pedestrian route and pv and other minor external works – Agreed 1/8/2025 – *(related to Units 1, 2, 3, and 4)*

**PL/25/1450/NMA** - Non-material amendment of condition 2 of planning permission PL/19/2054 including amendments to car parks, transformer locations, minor external alterations and yards (amended) – Agreed 11/11/25 – *(related to Units 2 and 4)*

**PL/25/1529/NMA** - Application under S96A of the Town and Country Planning Act 1990 (as amended) for a Non-Material Amendment to PL/19/2054. Including changes to car park, bin store relocation and changes to access points for Unit 1 (amended) – Agreed 5/12/2025 *(related to Unit 1)*

**Appraisal:**

The proposed changes, detailed above, would not materially alter the function of the condition, which would still require the necessary detail to be submitted at post rather than pre-occupation. The Design Stage BREEAM condition has already been approved (ref: PL/25/1748) and this exceeded the target minimum of Very Good (as defined in the condition) by targeting a higher rating of Excellent, achieving a score of 74.7%. However, it should be noted that the Final rating is determined on the basis of verified as-built evidence, and where design commitments are not fully implemented, this may affect the final score, however an extended submission period does not change this risk, and indeed condition 18 required a minimum of Very Good to be achieved.

Within the context of the overall scheme the proposed change is considered non-material and would have no material impact on the overall approved scheme nor the remaining conditions. As reiterated by the applicant the request to submit the Final BREEAM Certificate within six months of first occupation “*reflects*

*the practical requirements of the BREEAM process, the availability of as-built evidence, and BRE's certification timescales."*

**Conclusion:**

The changes as proposed are considered to be acceptable non-material alterations to the approved scheme.

**Recommendation:**

Approve non-material amendment subject to conditions. Although Section 96(A) of the Act does not allow for the original decision to be re-issued, it does allow the modification of, or imposition of, conditions. In this respect it is considered appropriate to impose an additional condition:

Condition

Amended Condition 19

19. Within 6 months of the first occupation of the development hereby approved, a copy of a Final BREEAM Certificate in accordance with the BREEAM Sustainability Standard following a post-construction stage review carried out by a licensed assessor has been submitted to and approved in writing by the Local Planning Authority, demonstrating that the development has attained as a minimum the standard of Very Good as set out in condition 18.

REASON: To ensure that the development is carried out in accordance with sustainable building standards in accordance with Policy CC2 and H5 of the Reading Borough Local Plan 2019.

Informatives

1. This notice relates only to the changes to condition 19 of the substantive planning permission (Ref: 192054). It shall be read in the context of the substantive planning permission and is bound by all the conditions and obligations attached to that permission. That permission still stands and this notice (and any other notices issued under section 96a for this development) should be read together.
2. In reaching this decision, the local planning authority is satisfied that the changes proposed by this application do not constitute a material change to the approved planning permission.