

# **Planning, Heritage, Design and Access Statement**

Replacement Safety Railing, The Oracle,  
Reading

April 2026

**Turley**

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April 2026

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# 1. Introduction

1.1 This Planning, Heritage, Design and Access Statement (PHDAS) has been prepared by Turley on behalf of The Oracle Limited Partnership (the ‘applicant’) to support a full planning application for the partial removal of the existing rooftop safety lines and handrails and replacement with rooftop safety rails at The Oracle, Bridge St, Reading, RG1 2AG.

1.2 For clarity, the description of development is as follows:

*“Full planning application for the removal of the existing rooftop safety lines and handrails and replacement with rooftop safety rails and installation of fixed ladder”.*

1.3 Due to regulatory changes, the proposal is sought to replace the existing safety lines with safety handrails which are compliant with the latest safety regulations.

1.4 The site is located within Reading Borough Council’s (RBC) administrative boundary.

## **Structure of the Planning, Heritage, Design and Access Statement**

1.5 A detailed list of the application submission documents and supporting plans accompanies the application. This PHDAS explores the key planning considerations relevant to the site’s development, with chapters set out as follows:

- **Chapter 2** – The Site and Surrounding Area
- **Chapter 3** – Development Proposal
- **Chapter 4** – Planning Policy Context
- **Chapter 5** – Planning Assessment
- **Chapter 6** – Conclusion

## 2. Site and Surrounding Area

- 2.1 The site comprises circa 3.86ha of land and is located within Reading town centre. The Oracle was granted planning permission in 1997 (ref. 970419) and opened in 1999. It has transformed Reading's town centre, providing space that suited modern retailer requirements at that time, and in turn helped establish Reading as a regional centre within the Thames Valley.
- 2.2 The Oracle sits at the heart of Reading town centre, having a main entrance on Broad Street, the town's historic main shopping thoroughfare and connecting through to the River Kennet.
- 2.3 The Oracle is the largest retail zone within Reading town centre, contributing nearly a third of Reading's town centre retail and leisure offer and considered to be a key driver of visits to the town centre. The supporting text to the Local Plan recognises the importance of The Oracle and highlights that its opening in 1999 helped to establish Reading as *"one of the leading shopping locations in the UK"* (para 5.1.4). The importance of the Oracle and the significant positive impact it has in strengthening the role and offer of Reading town centre is identified throughout the Local Plan.
- 2.4 The surrounding area is mixed in nature with a variety of town centre, commercial uses and residential uses. The River Kennet and Riverside Walkway traverses through the centre of the site from northeast to southwest direction. Bridge Street bounds the western elevation whilst Yield Hall Place bounds the eastern boundary. The site's southern boundary is adjacent to a key vehicular Internal Distributor Road (IDR) A329 (Queens Road) that facilitates traffic through and across Central Reading.

### Site Specific Designations

- 2.5 The site is designated within the Reading Central Area Boundary, Air Quality Management Area, Primary Shopping Area, the Central Core and an Area of Archaeological Potential. Additionally, the northeast and southeast corners of the site are located within the Market Place / London Conservation Area.
- 2.6 The southern elevation of the main Oracle building and the northern elevation of the multi-storey car park and cinema building are designated as Primary Frontage in Central Reading.
- 2.7 The south building which comprises the multi storey car park and cinema, is designated as the 'The Oracle Extension, Bridge Street and Letcombe Street Allocated Development Site'. This is a historic allocation and is not proposed to be retained as part of the Local Plan Partial Review, which is at an advanced stage.
- 2.8 The site is largely located within Flood Zone 1, however, the central part of the application site around the River Kennet and riverside walkway is located within Flood Zones 2 and 3 from the southwest corner to east.
- 2.9 There are a number of listed buildings within the surrounding context, including:

- Seven Bridges House – Grade II Listed (list entry number: 1321991)
- 2 and 4 London Street – Grade II Listed (list entry number: 1321993)
- 1 London Street (former Coroner’s Court) – Grade II Listed (list entry number: 1113514)
- High Bridge – Grade II Listed (list entry number: 1321938)
- 17 and 18 King Street – Grade II Listed (list entry number: 1113498)
- The George Hotel – Grade II Listed (list entry number: 1155931)
- Building on the South East Corner – Grade II Listed (list entry number: 1302482)
- 15 Gun Street – Grade II Listed (list entry number: 1113492)
- 13 and 14 Gun Street – Grade II Listed (list entry number: 1321919)
- 11 and 12 Gun Street – Grade II Listed (list entry number: 1303142)
- 10 Gun Street – Grade II Listed (list entry number: 1321918)
- 9 Gun Street – Grade II Listed (list entry number: 1155899)
- 8 Gun Street – Grade II Listed (list entry number: 1113491)
- 7 Gun Street – Grade II Listed (list entry number: 1321917)
- 6-10 Bridge Street – Grade II Listed (list entry number: 1113404)
- 2 and 4 Bridge Street – Grade II Listed (list entry number: 1303747)
- 3 and 5 Castle Street – Grade II Listed (list entry number: 1154637)
- Group of four churchyard tombs to the east of the Church of St Mary – Grade II Listed (list entry number: 1321886)
- Church of St Mary – Grade I Listed (list entry number: 1113573)
- Harrinson Testimonial Cross – Grade II Listed (list entry number: 1113574)
- Church House, Reading – Grade II Listed (list entry number: 1156954)
- 1 St Mary’s Gate – Grade II Listed (list entry number: 1321887)
- 55 and 55a St Mary’s Butts – Grade II Listed (list entry: 1113572)

## Planning History

- 2.10 A desktop review of the RBC’s online planning register has been undertaken in respect of the site’s planning history.
- 2.11 The original planning application for the shopping centre is a full planning application (LPA ref: 970419) for the *“Demolition of existing buildings, redevelopment and change of use to provide: shopping centre (Class A1, A2 & A3), 41 residential units, leisure facilities including multi-screen cinema (Class D2), car parking (2390 spaces) and community uses together with associated landscaping etc”*. The application was granted on 4 April 1997 and subsequently implemented creating the shopping centre on the northern side of the river and the Vue cinema, restaurant units and Riverside car park on the southern side of the river.
- 2.12 In November 2023, a Section 73 application was approved to remove a condition on the original consent in relation to the department store floorspace. This had the effect of creating a full new permission for the shopping centre and is considered to be the operative consent (ref. 230682).
- 2.13 Over the last 25 years since the opening of The Oracle, there has been a vast array of planning and advertisement consent applications to support the ongoing operation of

the shopping centre. These include, but not limited to, applications for the subdivision of various units, new access and seating areas, erection of new units, rooftop and car park works, street furniture, plant equipment, change of use applications along with a number of advertisement consent applications.

- 2.14 The planning history as listed on the planning register demonstrates that the principle of alterations to the shopping centre, along with applications related to the ongoing operation of the centre, have previously been supported by RBC.

### 3. The Proposed Development

- 3.1 This full planning application seeks to partially remove some of the existing rooftop lines and handrails and replace them with rooftop safety rails. Due to regulatory changes, the proposal is sought to replace the existing safety lines with safety handrails which are compliant with the latest safety regulations.

- 3.2 For clarity, the description of development is as follows:

*“Full planning application for the removal of the existing rooftop safety lines and handrails and replacement with rooftop safety rails and installation of fixed ladder”.*

#### **Context**

- 3.3 Reflecting its nature as an operational shopping centre, at roof top level there is a range of ancillary equipment essential to the operation of the shopping centre. This includes mechanical plant equipment, lift shaft and stair core overruns as well as roof top car parking areas (see image below).
- 3.4 The existing rooftop lines (see below image) allow safety equipment to connect to such as workers with harnesses.



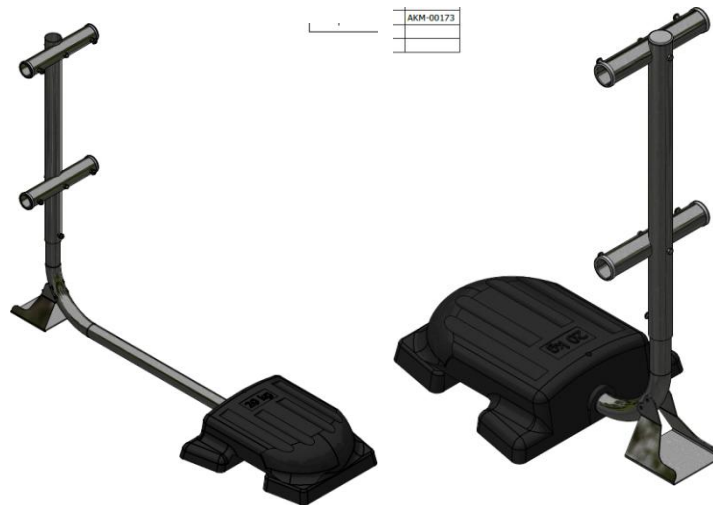
- 3.5 The applicant has undertaken a health and safety assessment and identified the existing rooftop lines are reaching the end of their operational life and due to regulatory changes to BS13700, the proposal is sought to partially replace the existing rooftop lines and handrails with safety handrails which are compliant with the latest safety regulations.
- 3.6 The new replacement rails are required to prevent workers and any people moving around on the roof from the risk of falling (from a height) and minimise the risk of accidental injury. These edge protection systems create a physical barrier that prevents people from entering hazardous areas of the roof edge to ensure the safety of Oracle employees and contractors when accessing rooftop infrastructure.
- 3.7 The nature and design of the scheme is largely functional and is dictated by health and safety standards, however, consideration has been given to the appearance of the

railings and materials selected which are compatible with the surrounding rooftop infrastructure.

- 3.8 A fixed ladder is also proposed to provide access to rooftop level on part of the shopping centre roof, close to the Broad Street entrance to the shopping centre (see submitted Proposed Roof Plan).

#### **Proposed Safety Rail**

- 3.9 The partial removal of the existing safety lines is proposed so that the replacement new rails comprising a standard vertical system can be installed. The new rails will have a mix of short and long leg counterweights depending on the location, with a height of circa 1100mm to the top of the rail. They are proposed to ensure that the Oracle can comply with the latest health and safety standards BS13700 (see images below).



(Illustrative image of long leg counterweight system)

(Illustrative image of short leg counterweight system)

- 3.10 Given the nature of the proposals is to protect works and other people moving on the roof, the layout of the replacement guardrails are specifically located along the perimeter of the roof's edge. The purpose is to prevent injury and minimise risk of falling. The extent of works proposed is a result of the health and safety assessment undertaken across the whole shopping centre, with all areas identified as failing to comply with the BS13700 standards identified for replacement / updated railings.



(Image of safety handrail)

- 3.11 Full details of the proposed works are provided on the application drawings submitted with the application.

## 4. Planning Policy Context

- 4.1 This section outlines the key planning policy considerations relevant to the proposed development at a national and local level.
- 4.2 It follows Section 54(a) of the Town and Country Planning Act (1990), as amended by Section 38(6) of the Planning and Compulsory Purchase Act 2004, which states that Local Planning Authorities (LPAs) should determine planning applications in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.3 **The Development Plan**
- 4.4 The Local Development Plan comprises the following documents:
- Reading Borough Local Plan (November 2019)
  - Proposals Map (November 2019)
- 4.5 The site is not situated within an area with a 'made' Neighbourhood Plan area.
- 4.6 RBC have prepared a Local Plan partial update and Proposals Map which was submitted to the Secretary of State (SoS) on 9 May 2025. Stage 1 hearings were held virtually on 11th and 12th November 2025, whilst Stage 2 hearings were held on 3-6 and 10-12 February 2026. A final remote hearing sessions was held on 23 February. Given the advanced stage of the draft plan, the Local Plan partial update is considered to carry significant weight in the determination of the application.
- 4.7 At a national level, relevant planning policy and guidance is set out within the National Planning Policy Framework ('the NPPF') published in December 2024 and the Planning Practice Guidance ('the PPG') in 2014 and updated as an online resource. These form a further material consideration.

### ***Reading Borough Council Local Plan***

- 4.8 The policies of relevance are summarised as follows:
- 4.9 **Policy CC1 (Presumption in Favour of Sustainable Development)** sets out that a positive approach towards for development proposals will be taken that reflect the strategy. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Proposed development that conflicts with the development plan will be refused unless other material considerations indicate otherwise.
- 4.10 **Policy CC7 (Design and the Public Realm)** states that all development must be of a high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.
- 4.11 **Policy RL1 (Network and Hierarchy of Centres)** identifies Reading as a regional centre with a focus on ensuring the vitality and viability of the centre is maintained and enhanced. The following improvements will be acceptable in all centres:

- Accessibility and transport improvements
  - Broadening the range of facilities
  - Residential use of upper floors
  - Environmental enhancements
- 4.12 **Policy CR1 (Definition of Central Reading)** states that the Central Area Boundary as shown on the Proposals Map will mark the edge of the town centre other than where specified.
- 4.13 **Policy CR2 (Design in Central Reading)** Applications for development within Central Reading should demonstrate that the architectural details and materials used in the central area should be high quality and respect the form and quality of the detailing and materials in areas local to the development site. Furthermore, development and any associated public realm should contribute to the diversity of the central area, be capable of easy adaptation over time to meet changing circumstances and be designed to enhance community safety. Lastly, the policy identifies that development should be designed with consideration of adjacent development sites and should not prevent or cause unreasonable burdens on the future development of those sites.
- 4.14 **Policy EN2 (Protection and Enhancement of the Historic Environment)** identifies that historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. Furthermore, all proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits.
- 4.15 **Policy EN3 (Enhancement of Conservation Areas)** states that the special interest, character and architecture of Conservation Areas will be conserved and enhanced. Development proposals within Conservation Areas must make a positive contribution to local character and distinctiveness. Positive consideration will be given to proposals which take opportunities to enhance the character of conservation areas.
- 4.16 **Policy EN6 (New Development in a Historic Environment)** states that in areas characterised by heritage assets, the historic environment will inform and shape new development. New development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development.
- 4.17 **Policy EN18 (Flooding and Drainage)** states that Development will be directed to areas at lowest risk of flooding in the first instance, following the Sequential and Exceptions Test set out in the NPPF, and taking into account the effects of climate change.
- 4.18 **Policy TR3 (Access, Traffic and Highway-Related Matters)** sets out that in determining proposals involving a new or altered access onto the transport network, improvement

works to the transport network, the creation of new transport infrastructure or the generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment.

## **Material Planning Considerations**

### ***Reading Borough Local Plan – Submission Draft Partial Update***

- 4.19 A summary of only those policies which have been reviewed and significantly updated which therefore differ to the policy wording within the Reading Borough Local Plan are summarised below.
- 4.20 Reviewed Draft Policy **CC7 (Design and the Public Realm – Strategic Policy)** states that all development must be of a high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. Proposals will be assessed to ensure that the development makes a positive contribution to context, identity, built form, movement, public spaces, uses, homes and buildings, resources and lifespan.
- 4.21 Reviewed Draft Policy **EN18 (Flooding and Sustainable Drainage Systems)** sets out that planning permission will only be granted where proposals have fully considered flood risk from all sources over the lifetime of the development.
- 4.22 Reviewed Draft **Policy CR2 (Design in Central Reading)** whilst the policy largely remains the same as the current adopted wording, the draft policy goes on to note that in cases where conflicts arise between elements listed within the condition, measures which bring the greatest public benefit will be prioritised.

### ***NPPF***

- 4.23 The following sections and paragraphs in the NPPF are considered to be of relevance to the proposal.
- 4.24 **Section 12 (Achieving Well Designed Places)** – Paragraph 131 sets out that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”. Furthermore, Paragraph 135 identifies that planning decisions should ensure that developments function well and add to the overall quality of an area, be visually attractive and sympathetic to the local character and history.
- 4.25 **Section 16 (Conserving and Enhancing the Historic Environment)** – Paragraph 207 identifies that *“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment*

*record should have been consulted and the heritage assets assessed using appropriate expertise where necessary”.*

- 4.26 Paragraph 208 states that *“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal”.*
- 4.27 Paragraph 212 sets out that *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance”.*
- 4.28 Paragraph 213 identifies that *“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification”.*
- 4.29 Paragraph 215 states that *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.*

## 5. Planning Assessment

- 5.1 This section considers the scheme in the context of the adopted development plan for the site, as well as the principle of the proposal.

### Principle of Development

- 5.2 The site comprises The Oracle which is in an operating shopping centre in the heart of Reading Town Centre. It is surrounded by a mix of retail, leisure, commercial, civic and residential uses. The proposal does not seek to alter the use and more rather it supports the operation of the site and ensure that this business can operate safely.
- 5.3 The proposal is purely functional and is required to enable the continued safe operation of the shopping centre and ensure Hammerson meets its legal requirement. The proposal is required to allow the site to adapt and comply with the latest health and safety legislation and ensure contractors working at rooftop level are in a safe environment. The proposal seeks to partially replace existing infrastructure on the roof and will assimilate with the existing plant and operational infrastructure on the shopping centre roof, and surrounding rooftops within this town centre environment. Such ancillary shopping centre equipment enables the shopping centre to continue to function in its role within Reading Town Centre.
- 5.4 The principle of development is therefore considered acceptable and accords with the aims and objectives of proposal therefore complies with the Policies RL1.

### Design

- 5.5 Paragraph 131 of the NPPF states that *“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”*.
- 5.6 Policy CC7 of the Local Plan requires new development to be of a *“high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located”*. Reviewed Draft Policy CC7 sets out that development should ensure that the development makes a positive contribution to context, identity, built form, movement, public spaces, uses, homes and buildings, resources and lifespan.
- 5.7 Additionally, Policy CR2 sets out that development within Central Reading should demonstrate that the *“architectural details and materials used in the central area should be high quality and respect the form and quality of the detailing and materials in areas local to the development site”* and *“be capable of easy adaptation over time to meet changing circumstances, and be designed to enhance community safety”*. Reviewed Draft Policy CR2 states that in cases where conflicts arise between elements listed within the condition, measures which bring the greatest public benefit will be prioritised.
- 5.8 The proposed development comprises the partial removal of the existing safety lines and replacement with new rails comprising a standard vertical system. The new rails will have a mix of short and long leg counterweights depending on the location, with a

height of circa 1100mm to the top of the rail. The scale of the new handrails is of an appropriate scale to ensure that any workers or other people moving on the roof are provided with adequate roof edge safety protection. The height is therefore dictated by the health and safety compliance standards which are tested and therefore required as a minimum to protect people from risk of injury. The specification of the railings adheres to the latest health and safety standards BS13700.

#### Scale

- 5.9 The scale, amount and layout are of an appropriate scale to enable the protection of workers and other people who are moving around the rooftop. Notwithstanding that, the replacement rails are considered to respect the existing site and surrounding area.
- 5.10 The replacement handrails to be located need to be sited towards the roof's edge to enable safe manoeuvrability and meet legislative requirements. However, given the height of the railings above street level and the nature of the surrounding town centre environment it is considered the visibility of the safety railings from ground level would be very limited. Any views of the railings would be glimpses and would be viewed alongside the existing operational infrastructure at roof top level such as plant equipment, parapet railings, car parking etc.
- 5.11 The appearance of the replacement handrails is considered to be in keeping with materials found within the site and surrounding area such as the façade of the Oracle car park, rails fronting Bridge Street and the rails and bike racks which are found along the Riverside Walkway and the general operational equipment at roof level.
- 5.12 Given the nature of the proposals, the overall design and appearance of the proposal is functional in nature to meet the latest health and safety regulations BS13700. The scheme is not considered to have a detrimental impact on visual amenity. The proposal is required to enable the shopping centre to continue to safely operate and complies with the aforementioned policies.

#### **Heritage Statement**

- 5.13 The NPPF requires applicants to describe the significance of any heritage assets affected by development proposals with the level of detail proportionate to the asset's importance (Paragraph 207), with great weight given to the asset's conservation (Paragraph 212).
- 5.14 Policy EN2 requires for all developments to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Policy EN3 states that the special interest, character and architecture of Conservation Areas will be conserved and enhanced, whilst Policy EN6 identifies that new development should respect and enhance the architectural and visual qualities in areas characterised by heritage assets.
- 5.15 There are a number of listed buildings located within the vicinity of the site and the northeast and southeast corners of the site are located within the Market Place / London Conservation Area, specifically within Area 3: Duke Street, Jacksons Corner and

the River Kennet as illustrated within the Market Place / London Conservation Area Appraisal. The appraisal sets out the characteristics for Area 3 to include, inter alia,:

- The least homogenous of the four character areas but represents the transition from central core shopping area to other uses including hotel, casino and office use as one progresses towards London Street.
- The area can be divided into riverside development beside the Kennet and urban development around Jacksons Corner.
- From Yield Hall Place the area is dominated by the bulk of the Oracle Shopping Centre.

5.16 The replacement handrails will be similar in appearance and scale to the existing safety lines which already exist and sited within the same position as the existing safety lines. They will be located on The Oracle, an established dominant feature within the Conservation Area in the context of a range of mechanical plant equipment and other operational infrastructure. They will be in keeping within their setting on a shopping centre.

5.17 Any views of the handrails from within the Conservation Area will be glimpses given the height of the rails above street level. The works do not directly impact any of the aforementioned listed buildings. As acknowledged within the Conservation Appraisal, there are a number of modern developments within Area 3, and the replacement rails will not materially impact upon the existing character or composition of the Conservation Area.

5.18 Overall, the impact upon the Conservation Area and listed buildings is considered to be neutral. The scheme will deliver neither heritage harm nor heritage gain.

5.19 Overall, the proposal complies with Policies EN2 and EN3 as well as Paragraphs 207, 208, 212 and 213 of the NPPF.

#### **Flood Risk and Drainage**

5.20 Policy EN18 states that Development will be directed to areas at lowest risk of flooding in the first instance, following the Sequential and Exceptions Test set out in the NPPF, and taking into account the effects of climate change. Reviewed Draft Policy EN18 sets out that planning permission will only be granted where proposals have fully considered flood risk from all sources over the lifetime of the development.

5.21 The overall site area is over 1ha in size given the extent of the shopping centre, and there are small areas of the site which are located within Flood Zones 2 and 3. Therefore, it is necessary to consider the flood risk implications of the proposed development.

5.22 The proposal involves installing replacement roof rails on the roof of the shopping centre, significantly above ground level. The proposal would not create any additional floorspace and will not create any additional hardstanding or impact upon any existing permeable surfaces or drainage infrastructure. As such, the proposal would not impact

on flood risk and the submission of a Flood Risk Assessment is not required to support the proposal. The proposal is therefore considered to comply with the aforementioned policies.

#### **Access**

- 5.23 Policy TR3 sets out that in determining proposals involving a new or altered access onto the transport network, improvement works to the transport network, the creation of new transport infrastructure or the generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment.
- 5.24 Public access to the centre will be unaffected by the proposed development. The handrails and ladder relate to contractor / operational access to the building to deliver enhancement to these access arrangements through improved safety measures. The proposal is therefore considered to comply with Policy TR3.

#### **Biodiversity Net Gain (BNG)**

- 5.25 Achieving a minimum 10% BNG became mandatory for all minor planning applications on 2 April 2024 and became mandatory for major applications on the 12 February 2024. The BNG PPG identifies a number of exemptions whereby mandatory BNG is not required to be achieved. Developments which do not impact a priority habitat and impacts less than 25 square metres (5m by 5m) of on-site habitat and 5 metres of on-site linear habitats such as hedgerows are classified as an exemption.
- 5.26 The proposal comprises the partial removal of some of the existing safety lines to be replaced with hand rails on the roof of the existing shopping centre. There is no existing habitat at roof top level. The scheme would be exempt from providing mandatory BNG given that it would not impact priority habitat or on-site habitat.

## 6. Conclusion

- 6.1 This statement supports a full planning application by The Oracle Limited Partnership for the partial removal of existing rooftop safety lines and their replacement with compliant rooftop safety rails at The Oracle, Reading. The works are required due to changes in health and safety regulations (BS13700) and are intended to ensure safe access for workers operating at roof level.
- 6.2 It has been demonstrated that the principle of development is acceptable in this location and would enable the continued safe operation of the shopping centre to minimise the risk of injury to workers and other people moving around on the roof.
- 6.3 This statement demonstrates the design, scale and appearance of the proposal is functional in nature, commensurate with the location on a shopping centre rooftop and would be viewed in the context of mechanical plant equipment and other shopping centre infrastructure. The works are compatible with the site's urban context. The proposal would not result in a detrimental impact upon the visual amenity nor result in heritage harm to any designated heritage assets within the vicinity.
- 6.4 Pursuant to Section 38(6) Planning and Compulsory Purchase Act 2004 determination must be made in accordance with the plan unless material considerations indicate otherwise.
- 6.5 It is maintained that the scheme complies with the requirements of the NPPF and local planning policy contained within the Reading Borough Local Plan (2019) and emerging policy with the Partial Local Plan Review (2025). The scheme will deliver essential health and safety upgrades which should be a material consideration in the determination of the application. The application should be approved without delay in accordance with the NPPF.

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