

DELEGATED APPLICATION REPORT

SITE ADDRESS: Abbey Gardens, 4-6 Abbey Street, Reading, RG1 3BA

APPLICATION NUMBER: PL/26/0091

PROPOSAL: External works to partial areas of all elevations at ground floor level and all areas of each elevation from 1st to 7th floor level, including replacement windows and doors, installation of brickwork following removal of existing glazing, the provision of Juliet balconies on all elevations and protruding balconies on the east and south elevations at 2nd floor level and above, and other associated works.

APPLICANT: McGrath Group

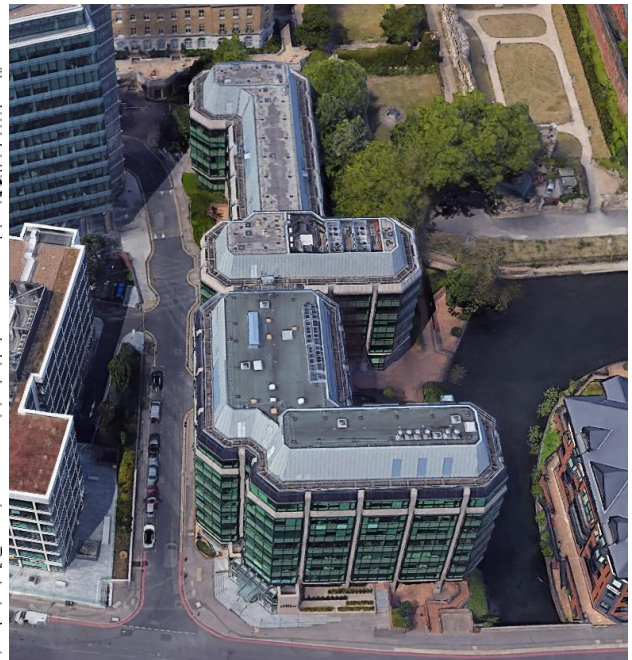
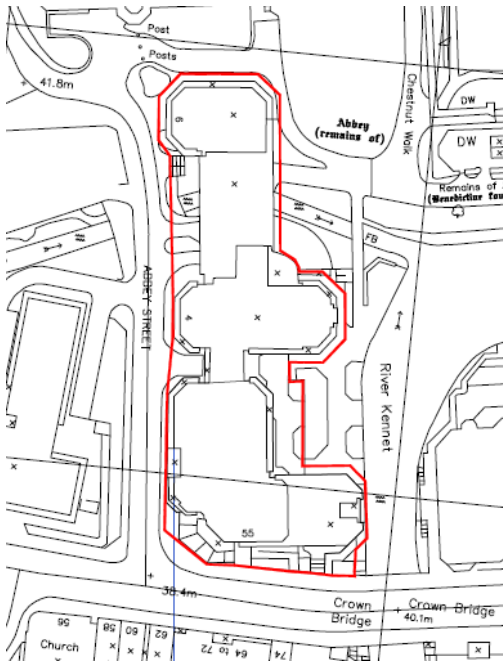
VALIDATION DATE: Valid as of 27/02/2026, having been first received on 26/01/2026

DETERMINATION DATE: Originally 24/04/2026, but an extension of time was agreed until 11/06/2026.

CASE OFFICER: Jonathan Markwell

1. Site Description and Surrounding Area

- 1.1 The application site is a basement, lower ground, ground and seven storey (10 floors in total, with a substantial roof level too) office building located on the corner of King's Road and Abbey Street. The main entrance to the building is on this corner. There is a terrace to the east of the building, set back at a higher level than the footpath along the River Kennet, with tiered landscaping to the front at river level, to the sides and on top of the terrace. Public access is possible through the site, with a path connecting Chestnut Walk with Abbey Street.



Left: Site Location Plan; Right: Google Maps aerial view (southern block in foreground)

- 1.2 At the time of writing there is a last remaining occupier within the northern section of the building at ground and first floor level. The remainder of the building is unoccupied, with strip out internal works and various other works in evidence at the site. Hoardings are in place at various points around the site, including on the Kings Road frontage and the

eastern side of the site. This is presently preventing pedestrians accessing Chestnut Walk from Kings Road via the eastern boundary of the site (adjacent to the River Kennet).

- 1.3 When asked to clarify the nature of the existing works on-going at the site, the agent for the applicant advised the following on 8 May 2026:

Regarding the works currently underway, the client has informed me that the roof and window works have not yet commenced on-site. Certain windows were removed solely to allow the engineer to transfer datums and gridlines into the building from the OS control point outside. A few windows were also broken during the strip out works of the office and therefore removed for safety reasons.

Additionally, roof elements were removed to facilitate strip-out works within the plant spaces; these will be reinstated should the proposed roofing works not proceed.



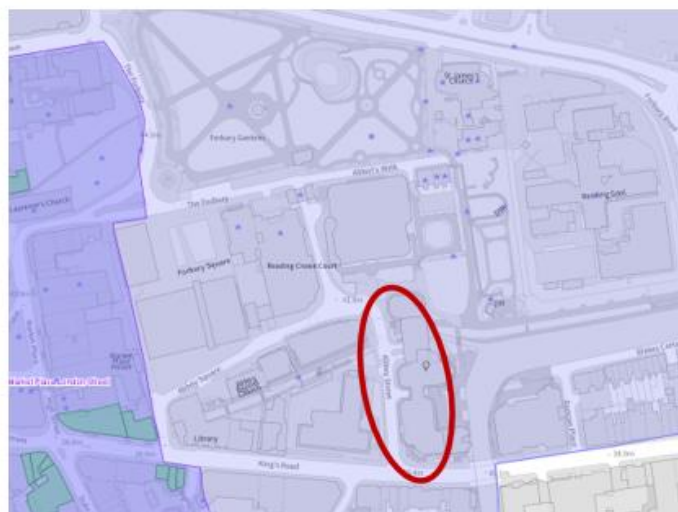
Above and below: External site photographs on 27 April 2026



- 1.4 The application site has been the subject of a series of planning applications in the past year. Prior approval PL25/0202 under Class MA was given on 23 May 2025 for the change of use of part of the ground to the fifth floor of the central and northern parts of the building to create 92 residential units (this specifically excludes the lower ground, ground and first

floor of the northern block – where an existing officer occupier remains in place at the site at the time of writing). Prior approval PL/25/0918 under Class MA was given on 21 August 2025 for the change of use of part of the ground to the seventh floor of the southern part of the building to create 107 residential units. Full planning permission PL/25/1175 was granted on 3 December 2025 for roof space windows on the northern and central parts of the building, together with enclosing an open roofed plant area in the central block. Prior approval PL/25/1711 under Class MA was given on 19 January 2026 for the change of use of the roofspace of the northern and central blocks to create 17 flats. Full planning permission PL/25/1729 was granted on 18 February 2026 for roof space windows on the southern part of the building. Prior approval PL/26/0012 under Class MA was given on 3 March 2026 for the change of use of the roofspace of the southern block to create 12 flats. A full planning application (Ref PL/26/0198) sought dormer windows and associated works in the northern and central parts of the building, but this was withdrawn by the applicant on 08/05/2026 following negative officer feedback. Please see section 3 of the report for more details on all recent applications.

- 1.5 The site is within the Central Reading Area, the Reading Central Core, Office Core and a Tall buildings Cluster (eastern grouping CR10c as per Reading Local Plan 2019). It is also within an area of Archaeological Potential, within the boundary of Flood zones 1, 2 & 3 (with the Holy Brook running beneath the building into the River Kennet) and an air quality management area. Furthermore, it is in the vicinity of the Abbey Ruins (Scheduled Ancient Monument), to the north-east, and therefore within the Abbey Quarter Policy Area. It is also at the confluence of two Green Links, with two sides of the building directly adjacent to the River Kennet. The building is not listed nor located within a Conservation Area, albeit there are a number of listed buildings and structures close-by. These include the Grade I Listed Reading Abbey Ruins and Grade II listed Reading Gaol (main building). Significant trees are in close proximity to the building (including TPOs). A public right of way (PROW) runs through the application site, as a connection between Chestnut Walk and Abbey Street, adjacent to the route of the Holy Brook at this point.



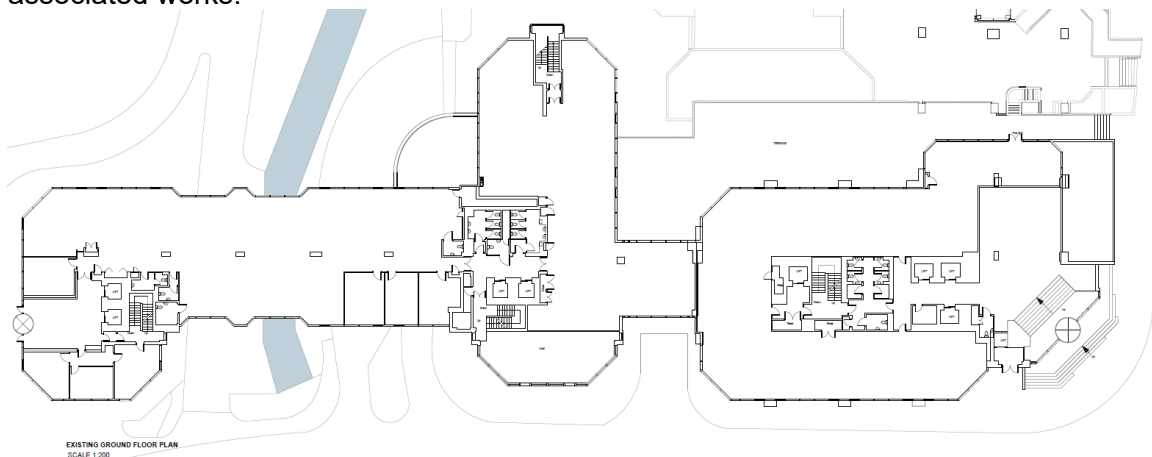
Location of the application site, listed buildings with stars on them and conservation area (dark purple)

- 1.6 More specifically, the Council's Conservation Officer confirms that the application relates to the site of Abbey Mills and Abbey Wharf, which was redeveloped and hosts a 1980s

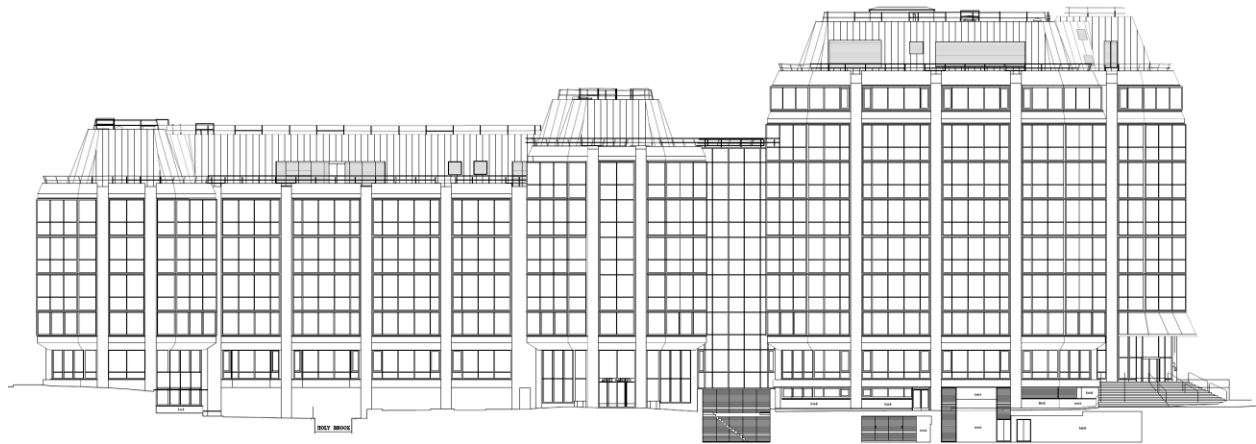
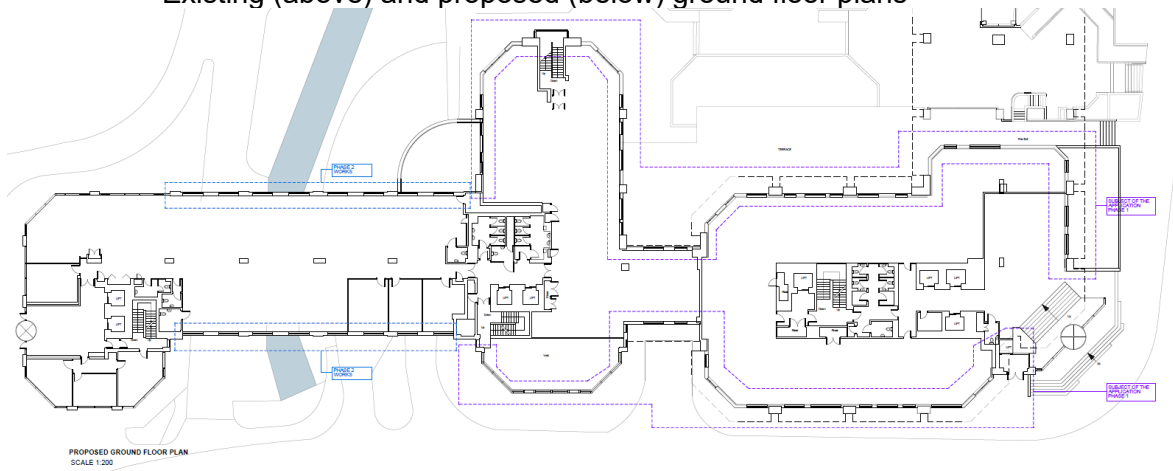
modern glazed office building. Located within the Abbey Quarter, the site is in close relationship with Grade I Listed Reading Abbey Ruins ([Reading Abbey Ruins, Non Civil Parish - 1113477 | Historic England](#)) and Grade II listed Reading Gaol (main building) former Her Majesty's Prison ([Reading Gaol \(main building\) former Her Majesty's Prison, Non Civil Parish - 1321948 | Historic England](#)). *As illustrated above, there are other listed buildings whose settings could have potentially been impacted by a development in the application site, such as Abbey Mill Ruins, 10 Abbots Walk, 11-12 Abbots Walk, and Archway Connecting Forbury Gardens to Abbey Ruins, including Retaining Walls, Flanking Path to Abbey Ruins, Assize Courts, Shire Hall and Abbey Gate. However, due to the nature of the proposal, there would not be any direct impact on these assets. Similarly, the site has a very limited visual relationship with the Market Place/London Street Conservation Area, which is located approximately 130m distant to the west, resulting in no impact on its setting.*

2. Proposal

- 2.1 Full planning permission is sought for various external works to the building, in preparation for its anticipated future residential use. This will involve the removal of the existing curtain walling at the building (with its glazed appearance) up to the parapet level (i.e. no roof level works are proposed as part of this application) and replacement with brickwork, windows and doors which are akin to a residential building, for which prior approval has separately been granted (aside from the lower ground, ground and first floors of the northern section of the building – see introduction section above for a summary and the relevant history section below for full details of previous applications). As part of the proposals, it is also sought to introduce Juliet balconies on all elevations and protruding balconies on the east and south elevations at 2nd floor level and above and other associated works.



Existing (above) and proposed (below) ground floor plans



2. EXISTING WEST ELEVATION

Existing (above) and proposed (below) Abbey Street (west) elevations



Below: Existing and proposed aerial visualisations from the east looking west (also showing the roof windows separately approved by applications PL/25/1175 PL/25/1729 -not proposed here)



Above: Proposed aerial view from the corner of Kings Road and Abbey Street.

Right: Existing view.



- 2.2 The applicant has explained that whilst the proposals involve all parts of the building up to parapet level, in practice the works, if approved, would be carried out in two phases. The majority of works would take place in the first phase, but recognising that there is an existing lower ground, ground and first floor office occupier within the northern block (with this section of the building not benefitting from any prior approval for change of use to residential), the applicant has indicated that a second phase of works would follow. Obviously, from the local planning authority's perspective, it remains to be seen whether the office occupier vacates the building in the future (with that being a commercial matter outside of the control of the local planning authority), but ultimately the application seeks permission for works to all parts of the building and is considered on that basis – the indication by the applicant, as specified in full below, is helpful in the overall assessment of the proposals.

Phasing

- 4.10 A portion of the building in the north block at ground and first floor remains under a commercial lease. Whilst this application seeks permission for façade works to be undertaken to the entirety of the building up to parapet level, this is expected to be delivered in two phases. The majority of the works to the building will be carried out from the outset, alongside the change of use of the respective residential elements. The works to the remainder of the building (the ground and first floor of the north block) will follow, along with a future application for the change of use of this additional space. The submitted proposed elevation drawings makes this clear. The design has been mindful of this phased approach and care has been taken to ensure the replacement façade will be complementary to the retained elements for the period they remain in place.

2.3 Prior to the validation of the application a series of amended plans and further documents were received, as inconsistent / insufficient information was submitted at the outset. During the course of the application the applicant has submitted an updated Flood Risk Assessment, together with standalone heritage and sustainability statements, and a letter summarising what the applicant considers are the planning benefits of the proposals. Furthermore, the following was also submitted during the application:

- a Preliminary Roost Assessment and Tree Protection Plan were submitted following initial officer feedback;
- a letter by Anstey Horne responded to matters raised in the independent light review and a follow up email subsequent to further comments by the independent assessors;
- a revised Demolition and Construction Plan was submitted following officer feedback;
- a Construction Environmental Management Plan & Ecological Enhancement Plan was submitted following officer feedback;
- an Exterior Lighting Survey and Design Calculation Report was submitted following officer feedback.
- Various further information was submitted via email correspondence in relation to ventilation matters

2.4 Plans and documents considered:

- Application for Planning Permission PP-14643456, dated 23/01/2026
- Community Infrastructure Levy (CIL) - Form 1: CIL Additional Information, dated 23/01/2026
- Abbey Gardens, Façade Planning Application Planning, Design and Access Statement by hgh Consulting, dated January 2026
- Noise Impact Assessment Report by KP Acoustics Ltd Ref 28800.NIA.01 Rev E, dated 06/01/2026
- ABBEY GARDENS, ABBEY STREET, READING, RG1 3BA – LIGHT WITHIN THE PROPOSED DEVELOPMENT by Anstey Horne, Ref ROL01535, dated 24/12/2025;
- Letter 'Proposed Planning: The proposed application will seek planning permission to replace the existing building façade at Abbeygardens Reading at Kings Road, Reading, RG1 3BA' by Ryan & Associates Limited, dated 07/01/2026.
As all received on 26/01/2026
- Abbey Gardens – Façade Renovations Design Statement by Sada Architecture Ltd, dated February 2026
As received 11/02/2026
- 8-200 Rev P.02 – Site Layout Plan
- 8-210 Rev P.01 - Existing Ground Floor Plan

- 8-211 Rev P.01 - Existing First Floor Plan
 - 8-212 Rev P.01 - Existing Second Floor Plan
 - 8-213 Rev P.01 - Existing Third Floor Plan
 - 8-214 Rev P.01 - Existing Fourth Floor Plan
 - 8-215 Rev P.01 - Existing Fifth Floor Plan
 - 8-216 Rev P.01 - Existing Sixth Floor Plan
 - 8-217 Rev P.01 - Existing Seventh Floor Plan
 - 8-218 Rev P.01 - Existing Roof Plan
 - 8-240 Rev P.01 - Existing Sections
 - 8-250 Rev P.01 - Existing East and West Elevation
 - 8-251 Rev P.01 - Existing North and South Elevation
 - 8-252 Rev P.02 - Existing South and Central Block Elevations
 - 8-310 Rev P.02 - Proposed Ground Floor Plan
 - 8-310.2 Rev P.01 - Proposed Ground Floor Plan – Phase 2
 - 8-311 Rev P.02 - Proposed First Floor Plan
 - 8-311.2 Rev P.01 - Proposed First Floor Plan – Phase 2
 - 8-312 Rev P.02 - Proposed Second Floor Plan
 - 8-313 Rev P.02 - Proposed Third Floor Plan
 - 8-314 Rev P.02 - Proposed Fourth Floor Plan
 - 8-315 Rev P.02 - Proposed Fifth Floor Plan
 - 8-316 Rev P.01 - Proposed Sixth Floor Plan
 - 8-317 Rev P.01 - Proposed Seventh Floor Plan
 - 8-318 Rev P.01 - Proposed Roof Plan
 - 8-400 Rev P.01 - Proposed Sections
 - 8-400 Rev P.01 - Detail sections
 - 8-500 Rev P.01 - Proposed East and West Elevation
 - 8-500.2 Rev P.01 - Proposed East and West Elevation – Phase 2
 - 8-501 Rev P.01 - Proposed North and South Elevation
 - 8-501.2 Rev P.02 - Proposed North and South Elevation – Phase 2
 - 8-502 Rev P.02 - Proposed South and Central Block Elevations
- As all received on 27/02/2026
- 8-300 Rev P01 – BLOCK PLAN
- As received on 20/05/2026
- Flood Risk Assessment by EAS Revision B, dated 26/01/2026, as received 04/03/2026
 - Heritage Appraisal by The Heritage Practice, dated March 2026, as received 09/03/2026
 - BREEAM Planning Statement by Love Design Studio, Ref 1066_03 Version 03, dated.20/03/2026, as received 20/03/2026
 - Preliminary Roost Assessment by Arbtech Consulting, Version 2.0, dated and received 28/04/2026
 - Tree Protection Plan Abbey Gardens, Reading by Randalswood, as received 30/04/2026
 - Letter by Anstey Horne - ABBEY GARDENS, ABBEY STREET, READING, RG1 3BA (PLANNING APP REF. PL/26/0091) – LIGHT WITHIN THE PROPOSED DEVELOPMENT, Ref WW/EK/ROL01535, dated 29/04/2026, as received 30/04/2026.
 - Letter by hgh - ABBEY GARDENS – FAÇADE ALTERATIONS (REF: PL/26/0091), dated and received 12/05/2026.
 - Façade Demolition and Construction Plan prepared by Randalswood Construction Limited Rev 03 dated and received 19/05/2026;

- Email from hgh Consulting 'Re: Abbey Gardens, 4-6 Abbey St, Reading (PL/26/0091)' dated and received 19/05/2026
 - Email from hgh Consulting 'Re: Abbey Gardens, 4-6 Abbey St, Reading (PL/26/0091)' dated and received 27/05/2026
 - Construction Environmental Management Plan & Ecological Enhancement Plan by Arbtech Consulting Ltd, dated 27/05/2026, as received 05/06/2026.
 - Exterior Lighting Survey and Design Calculation Report by SKR Lighting Design, Rev A, dated and received 05/06/2026
 - Email from hgh Consulting 'Re: Abbey Gardens, 4-6 Abbey St, Reading (PL/26/0091)' dated and received 08/06/2026 at 13:24hrs
- 2.5 Community Infrastructure Levy (CIL) – A CIL form has been submitted with the application, as required. The proposed works are not considered to be CIL liable.

3. Relevant Planning History

- 3.1 PL/11/0658 - Remodelling of existing office entrance area and alterations to access to include disabled entrance and lift. Permitted 04/01/2012.
- 3.2 111790/FUL Installation of new plant and alterations to the roof to create associated louvre openings. Permitted 07/02/2012.
- 3.3 120497/ADV Hoarding marketing wrap and 2 halo illuminated entrance signs Permitted 22/08/2012.
- 3.4 121139/APC Discharge of condition 4 of planning permission 11/01726/FUL (also known as ref 110658/FUL) Discharged 28/06/2012.
- 3.5 121582/NMA Non material change to planning permission 11/01726/FUL for modifying and raising the levels of the planters to the south elevation along Kings Road to include for the existing floor structure below Agreed 04/10/2012.
- 3.6 121616/CLE Certificate of Lawfulness for proposed new door Permitted 15/08/2012.
- 3.7 172261/FUL External terrace and decked area, Refused 10/05/2018.
- 3.8 191033 - 2 no. Freestanding Directional Signs and 1 no. Building Mounted Sign. Granted 25/09/2019.
- 3.9 191777/FUL Removal of 2no glazed panels and installation of new Air Intake Louvres to match existing. Permitted 10/01/2020.
- 3.10 200477/FUL Remove existing glazed panel and replace with new entrance door to terrace area Permitted 27/05/2020.
- 3.11 20/1835/FUL Removal of 1No. glazed panel and the installation of a new air intake/outlet to match existing (part retrospective) Permitted 01/03/2021.
- 3.12 210071/NMA Non-Material Amendment to permitted application 200477 - revise the design from a single door to a single door with side and overhead glazed panels. Agreed 11/02/2021.

- 3.13 PL/21/1723 - Application for prior notification of proposed development by telecommunications code systems operators.
- 3.14 23/0211/FUL Remove existing glazed panel and replace with new entrance door to terrace area Permitted 19/04/2023.
- 3.15 PL/25/0202 - Change of use of part of ground, first, second, third, fourth and fifth floors from Class E (offices) to C3 (dwelling houses) to comprise 84x1 bed and 8x2 bed flats. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015. Prior Approval Given 23/05/2025.
- 3.16 PL/25/0918 - Change of use of part of the ground floor to seventh floor from Class E (offices) to C3 (dwelling houses) to comprise 53 1x bed and 54 2x bed flats. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015. Prior Approval Given 21/08/2025.
- 3.17 PL/25/1148 - Change of use of part of the 5th (north block) and 6th (middle block) floors from Class E (offices) to Class C3 (dwelling houses) to comprise 14 (1x1, 11x2 & 2x3-bedroom) residential units. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended). Application withdrawn 16/09/2025.
- 3.18 PL/25/1175 - Installation of roof space windows on the north, east and west elevations of the north block and north, south and west elevations of the central block and construction of a roof to enclose the plant area within part of the central block, all associated with the existing office use (Class E) (amended description). Granted 03/12/2025.
- 3.19 PL/25/1711 - Change of use of part of building from Class E (offices) to Class C3 (dwelling houses) to comprise 17 flats. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015. Prior Approval Given 19/01/2026.
- 3.20 PL/25/1729 - Installation of roof space windows and associated works within the north, east, south and west elevations of the south block of the offices (Class E). Granted 18/02/2026.
- 3.21 PL/25/1769 - Application for Approval of Details Reserved by Condition 6 (Supplementary Desk Study Report), 7 (Remediation scheme) and 8 (Remediation scheme implementation) of application PL/25/0918. Approved 04/02/2026.
- 3.22 PL/26/0012 - Change of use of part of building from Class E (offices) to Class C3 (dwelling houses) to comprise 12 new flats. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015. Prior Approval Given 03/03/2026.
- 3.23 PL/26/0060 - Application for Approval of Details Reserved by Condition 6 (Supplementary Desk Study Report), 7 (Remediation scheme) and 8 (Remediation scheme implementation) of application PL/25/0202. Approved 17/03/2026.

- 3.24 PL/26/0198 - Installation of roof space dormer windows on the north, east and west elevations of the north block and on the north, east, south and west elevations of the central block, all with associated external terrace spaces and replacement balustrades; the construction of a roof to enclose the plant area within part of the central block; and other associated development, all associated with the existing office use (Class E). Withdrawn 11/05/2026.
- 3.25 PL/26/0248 - Change of use of part of building from Class E (offices) to Class C3 (dwelling houses) to comprise 17 Flats. Prior Notification under Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015. Withdrawn 18/05/2026.

4. CONSULTATION AND PUBLICITY

- 4.1 RBC Building Control: No response.
- 4.2. RBC Conservation Officer: Summary - No objection (subject to condition) – The proposed scheme would result in no harm to the settings of heritage assets – Reading Abbey Ruins and Reading Gaol. A condition for the proposed brick slips' samples is suggested.
- 4.2.1 It is noted that the proposals have undergone some revisions following the pre-application advice, which raised some concerns about the colour and appearance of the proposed remodelling of the façade as follows:
- *"The Abbey Ruins have materials of 'Caen stone', 'flint' and 'Taynton stone', and the proposal would have a buff brick colour that is very close to the colour of Abbey. The result would be that the appearance of the building would be more dominant and dominating public views approaching the Abbey, causing the Abbey to be less visible. As such, I would highly recommend reconsideration of the proposed colour.*
 - *In addition, I noted that balconies are proposed to break the massing. However, I think the existing building already has some features, such as angled corners to break massing, which is one of the unique characteristics of the building. Therefore, in relation to the colour and scale of the building, I would suggest breaking the massing by the use of different materials or colours in different parts/elevations of the building. I think the Council needs to see more alternatives.*
 - *Since Reading Gaol and its outer walls are constructed of red bricks, I think red is the other colour that should be avoided, especially for the longer facades. As seen in the next page, the proposed King's Road façade appears more appropriate due to its perceived scale."*
- 4.2.2 The current application, as stated in the submitted Planning Statement, Design and Access Statement and Heritage Appraisal, utilises the comments above and appears to combine a collection of volumes with brick materiality in three different colours, aiming to provide a subtle contrast to the settings of the heritage assets. Considering the existing architectural features and appearance of the office building, I conclude that no additional harm would be generated by the proposed development.

- 4.2.3 The illustrations provided in the Design and Access Statement are helpful; however, the Council needs the full details of the proposed brick slips, and therefore, I support the application subject to the condition that the details or samples of the brick slips are provided. The proposal would meet the policies EN1 and EN6 of the Reading Borough Local Plan, 2019.
- 4.3 RBC Environmental Protection (EP): Initial comments that the noise assessment is generally acceptable, but more details concerning the ventilation strategy is required. The applicant subsequently confirmed that will be a mechanical ventilation system in each apartment and no trickle vents in the windows. EP then sought clarification as to whether the proposed mechanical ventilation has summer bypass cooling and whether the noise from the system itself will be compliant with BS8233 internal noise levels. The applicant advised the following on 08/06/2026:
- Regarding the mechanical ventilation, the system does not include summer bypass cooling. As this is a permitted development scheme, it is not required to meet the same Part O Building Regulations standards that would necessitate such a feature. However, the client has confirmed that the system is fully compliant with BS8233 internal noise levels.*
- It is important to note that the proposed facade offers significant improvements over the existing one, which has no ventilation whatsoever and is prone to overheating. The new design is vastly superior in terms of ventilation, thermal performance, and sound insulation, which will dramatically reduce overheating compared to the current building.*
- 4.3.1 EP advised that in this situation, in which the noise levels were only just above the acceptable levels with windows open, this is accepted on balance. A compliance-worded condition will secure the glazing / ventilation / mitigation being installed in line with the noise assessment prior to the first occupation of any future residential unit.
- 4.4 RBC Transport: Initial queries were raised in relation to the proximity of a lamp column on Abbey Street and the impact on any Juliet balconies and during the construction period. Further queries were raised in relation to the relationship between the balconies and the public highway / PROW. The applicant has been advised that separate Highways licenses would be required under section 177. It is advised that an informative is added to the decision notice in this respect.
- 4.4.1 The submitted CMS is confirmed to be satisfactory in relation to Transport based considerations. More specifically, all the closures/diversions were considered and agreed by street works prior to the submission of the CMS. A compliance condition should be secured for the development to be carried out in accordance with the submitted CMS.
- 4.4.2 The proposed works do not change or impact the parking or access arrangements or the Highway (once the construction works have taken place). There are no Transport objections to this application, subject to conditions and informative.
- 4.5 RBC Natural Environment: Initial comments: The proposal will involve at a lot of external works all around the building. Given the site is within the lowest canopy cover ward and an AQMA, the protection of trees and vegetation around the building from harm during works will be important. [I note the application form states there are no trees on site].

Therefore, a Tree/Vegetation Protection Plan should be submitted – preferably prior to a decision to avoid a pre-commencement condition. Otherwise, condition L7 will be required specifically for a Tree Protection Plan.

- 4.5.1 The applicant subsequently submitted a plan in an attempt to avoid the pre-commencement condition. The submitted document is considered to be largely satisfactory, with the exception of not commenting on the soft landscape beds around the site. *Planning Officer comment: the level of information is considered adequate, particularly bearing in mind the existence of a hoarding at part of the site already. Hence, a compliance condition will suffice in this instance, rather than requiring any further details to be submitted.*

4.6 GS Ecology (RBC Ecology consultants): Initial comments summarised as follows:

- Bat survey required prior to the determination of the application, as
 - o The site is located adjacent to two watercourses which are likely to be used for foraging and commuting bats.
 - o The proposals will involve extensive alterations to the existing façade and the building may possess features such as gaps or other areas that could be used as potential roosting features.
 - o There are records of bat roosts close to the site
- Most of the existing on-site habitats are of low ecological value and unlikely to provide habitat for protected species.
- The site is adjacent to the River Kennet which is likely to be a Priority Habitat and forms a significant Green link through Reading. There is a policy need to safeguard and enhance “wildlife corridors” and “ecological networks” and hence a comprehensive Construction Environmental Management Plan (CEMP) for biodiversity is required and should be secured via a planning condition.
- The proposed ecological enhancements, integrated bat boxes and bird nesting boxes, should be secured via a planning condition.
- In terms of biodiversity net gain, works appear to be confined largely to the existing hardstanding and building with very few habitats affected with only limited impacts on very small areas of shrub and trees. Although the development extends over two sections of the River Kennet watercourse, however the works are primarily external changes to the cladding and do not include works to the riparian area. As such, a watercourse BNG assessment is unlikely to be required. The application form states less than 25m2 of habitats are affected which is likely to be correct based on the current plans.
- In terms of lighting, no details have been submitted. In the context of the adjacent River Kennet, which is of significant value for wildlife and used by foraging and commuting bats, wildlife friendly lighting details should be secured via planning condition.

- 4.6.1 Following the submission of a bat survey, GS Ecology confirmed that this has been undertaken to an appropriate standard and concludes that the building is unlikely to host roosting bats. As such, the proposals are unlikely to affect bats and the development is not expected to result in harm to bats.

- 4.6.2 The applicant subsequently submitted a CEMP, ecological enhancements and lighting details, in an attempt to avoid the need for conditions being required which require further details to be submitted. GS Ecology advise that there are a series of issues with the information submitting, ranging from the biodiversity protection zones not being clearly identified, there being inconsistencies in terms of the bat and bird box provision and the

submission lacking the necessary precision in terms of the applicant committing to undertake works – e.g. the use of “it is recommended” and “should”, rather than the required “will”. In terms of the light assessment, there are a host of issues, including insufficient information has been submitted to show the lighting levels along the River Kennet, or across the water corridor, the luminaires not being set out and no assessment of the internal lighting being provided. Hence, the information submitted does not satisfy the conditions and the originally referenced conditions should continue to be secured as referenced at the outset.

- 4.7 Hawkins Environmental (RBC's appointed independent reviewers of the daylight, sunlight & overshadowing information submitted in support of the application): Hawkins initial review, based on a brief agreed between the LPA and the applicant, raised a number of issues, as summarised below:

Does the Anstey Horne Report use appropriate methodologies for assessing daylight and sunlight, solely in relation to future occupiers of the anticipated future residential occupiers?

Overall, the methodology is appropriate; however, in the application of the methodology, there are significant deviations from the typical procedures, specifically with the omission of kitchens from the analysis and the use of abnormally high reflectances, all without significant justification. These deviations, whilst they could be justified, in their unjustified state, could significantly skew the results and make the results appear much better than they actually are. For example, the omission of c.100 rooms that all fail to meet the BRE recommendations will have a significant impact on the overall results.

Conclusion: Unjustified deviations from the typical methodologies result in significantly skewed results.

Has the Anstey Horne Report tested all necessary possible future residential units associated with the proposed development, mindful of the applications referenced within the background section above?

Conclusion: It is understood that the Anstey Horne Report has considered all dwellings associated with the proposed development.

Does the proposed development would provide sufficient access to daylight for future occupiers of the proposed residential units within the proposed development site?

Conclusion: The results as presented show a good level of internal daylight given the location. However, there are potential shortcomings in the use of non-standard reflectance values and omitting kitchens, which if corrected, could significantly reduce daylight availability to a level that may be considered unacceptable.

Does proposed development provides sufficient access to sunlight for future occupiers of the proposed residential units within the proposed development site?

Conclusion: On balance, some dwellings receive good levels of direct sunlight. However, inevitably, some dwellings receive none. This is not considered a major issue, as direct sunlight is a desired quality rather than a necessity.

RBC asks:

“d) Following on from a), b) and c) if you consider that there are significant shortfalls / concerns with any daylight or sunlight element, please also specify whether:

- 1) There may reasonably be simple means of addressing these concerns (and, if so, specify possible measures which the applicant could explore)?
- 2) Whether, owing to the results shown, any revisions would instead be likely to require significant changes to the scheme?”

As noted, there are significant concerns regarding the veracity of the results, specifically in relation to the use of non-standardised reflectance and the omission of the kitchens.

It is strongly recommended that in the first instance, the daylight assessment is updated to reflect the concerns highlighted within this document, specifically:

1. Either: update the calculations to incorporate the default reflectances, or provide a thorough justification as to why alternatives are being used. If adequate daylighting within the rooms relies on highly reflective surfaces (for example lighter coloured walls or floor coverings), details of how these reflectance values will be maintained must be provided.
2. The daylight assessment must include all habitable rooms (which the BRE defines as including all kitchens), even if the rooms have no windows.

It is likely that this will result in a significantly lower percentage of rooms meeting the guidance.

It is important to note that where rooms do not fully meet the BRE Guidance, it does not necessarily mean that the development would be considered unacceptable. The BRE Guidance represents “Best Practice Guidance” and it notes that the advice given in the report is not mandatory nor adopted planning policy and the numerical guidelines “*should be interpreted flexibly since natural lighting is only one of many factors in layout design*”.

It is important to note that the NPPF now specifically mentions daylight/sunlight in national planning policy. The NPPF states that:

“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances... local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)”.

As a consequence, this review does not necessarily conclude that daylight within the dwellings would be unacceptable, rather that the level of daylight within the rooms has not been correctly quantified. It is entirely plausible that if this assessment was to be updated and the number of rooms meeting the guidance was to reduce, RBC may still grant permission as the benefits of this scheme outweigh the loss of amenity to future residents. It is important to note that regardless of the outcome of this application, this building has Prior Approval to be used for residential purposes.

4.7.1 On the basis of the above, this was fed into the applicant and a response was provided, which was then further considered by Hawkins Environmental, who advised:

I have reviewed the comments provided by Anstey Horne. While I am generally satisfied with the majority of their feedback—such as their helpful justification of the reflectance values used—I remain concerned regarding how the omission of certain spaces impacts the overall compliance figures.

I agree with Anstey Horne’s technical principle that internalized, windowless spaces enclosed by walls do not fall within the normal scope of a daylight model, as there is no external window opening to physically assess. However, my concern is not whether these windowless rooms should have been modelled; it is how their exclusion alters the final reporting metrics.

By completely removing these spaces from the final totals, the report presents an inaccurate picture of the development’s overall daylight performance:

- **As Reported:** The assessment states that **80%** of the assessed rooms meet the BRE guidelines (364 out of 455 rooms).
- **Adjusted Impact:** Roughly 100 kitchens (alongside a number of dining areas) have been omitted from the denominator. Because these windowless spaces will

receive no daylight, factoring them into the total scheme metrics drops the true compliance rate closer to 65% (364 out of 555 rooms).

The report currently creates the impression that 80% of the building's rooms successfully meet BRE Guidance, whereas the actual proportion of compliant habitable spaces is significantly lower. Therefore, if Reading Borough Council is minded to grant consent, I recommend that they exercise caution regarding these headline percentages, as they do not fully represent the reality of the proposed layouts.

4.7.2 The applicant was advised of the above and provided the following additional commentary:

In response to the daylight sunlight information, we welcome the confirmation that the technical principle is agreed, namely, that internalised, windowless spaces do not fall within the normal scope of a daylight assessment, as there is no external window opening through which daylight availability can be assessed. The key point from a daylight perspective is that Hawkins' 65% adherence figure combines assessed rooms with spaces that are not capable of being assessed under the normal scope of a daylight assessment, due to the absence of external window openings within these enclosed spaces. The reported adherence of 80% relates specifically to the rooms assessed within the normal scope of the daylight analysis and is therefore accurate in this context, reflecting the reality of the proposed design.

As to whether the internal configuration of such spaces is acceptable in overall design and planning terms, we acknowledge this is a broader matter for RBC to consider and beyond the remit of the daylight and sunlight surveyor.

As outlined in our letter dated 12 May 2026, the proposal delivers significant benefits architecturally, environmentally, and for the amenity of future residents. The proposals will improve the local character and provide a sympathetic contrast to the nearby heritage assets.

We trust the above assists with your consideration of the planning balance.

4.8 Reading Design Review Panel (DRP): It is noted that the proposals were considered at pre-application stage by the Reading DRP. It is clarified that the DRP has not been engaged at application stage. At the pre-application stage, DRP made a series of comments, summarised as follows:

- The existing building façade treatment is seen to have a neutral impact on the surrounding context.
- It is however seen to be quite dated in style, and due to the design it does emphasise its mass. There is an opportunity here to 'break down' the building mass through variation in the treatment of a new façade.
- The reduction of glazed elements and addition of insulation will have a positive benefit on the internal environment in terms of limiting solar heat gain and subsequently thermal comfort. Furthermore the introduction of openable windows and doors onto balconies, and louvres above will provide residents with user control and some natural ventilation. There is some concern with the proposed façade sections provided, in providing a thermal line. Further development of the detail is encouraged at this stage.
- Further consideration needs to be given to reviewing material palettes for the brick slips and the openings and balconies. The precedent images were well received with particular discussion on the relief brick slip variation and the randomized pattern of balconies and the applicant is encouraged to explore this further.

- The panel also queried the durability of bricks slips and recommended maintenance be further considered.
- The panel welcomed the use of brick, but also highlighted that there was a broad range of materials in the surrounding buildings from which to take precedent.
- The variation of two different colours to the two main blocks were seen positively by the panel, as this broke down the massing.
- The panel are keen to note that while varied colour palettes and materials can help break down the massing, there's also a risk that the building ends up looking like a patchwork quilt, which can feel dated and unnecessarily fussy. There is conviction in utilising a limited palette on a scheme.
- The panel recommends that the design is developed further to break down the massing more; the expression of the concrete frame is currently less apparent in the visuals than as existing, especially with the lighter buff brick proposed on the southern block.
- The panel recommends introducing variation in the balconies... helping the design feel more domestic in character and better attuned to its surrounding context.

4.9 Environment Agency: welcome the intention to include bat boxes, swift bricks and sparrow ledges and seek for these to be secured via an appropriate mechanism. In terms of flood risk, the proposed development will only meet the NPPF's requirements if a condition is secured for the development to be carried out in accordance with the FRA submitted, including mitigation measures. An informative in relation to the applicant requiring a separate Environmental Permit is also recommended.

4.10 Public Consultation – Four site notices were erected around the site on 06/03/2026, expiring on 27/03/2026. A press notice was published on 19/03/2026, expiring on 09/04/2026. No responses have been received.

4.11 Local Groups: Reading Conservation Area Advisory Committee (CAAC) and Reading Civic Society were both formally consulted. No responses have been received.

5. Equality Act 2010:

5.1 In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. However, there is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application. Therefore in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

6. Relevant Planning Policy and Guidance

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy Framework (NPPF) – among them the 'presumption in favour of sustainable development'. However, the NPPF does not change the statutory status of the development plan as the starting point for decision making (NPPF paragraph 12). The Development Plan for Reading relevant to the application site comprises the Reading Borough Local Plan (2019).

- 6.2 Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving a listed building or its setting or any features of special interest which it possesses.
- 6.3 Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority in the exercise of its functions to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.
- 6.4 The National Planning Policy Framework (“NPPF”) states clearly that its content is to be a material consideration in the determination of applications. The NPPF states that due weight should be given to the adopted policies of the Local Plan according to their degree of consistency with the NPPF (the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given). Accordingly, the NPPF, together with the NPPG and the following development plan policies and supplementary planning guidance are relevant:
- 6.5 National Policy and Guidance
- National Planning Policy Framework December 2024 (and update February 2025)
- 2. Achieving sustainable development
 - 4. Decision-making
 - 6. Building a strong, competitive economy
 - 8. Promoting healthy and safe communities
 - 11. Making effective use of land
 - 12. Achieving well-designed places
 - 14. Meeting the challenge of climate change, flooding and coastal change
 - 15. Conserving and enhancing the natural environment
 - 16. Conserving and enhancing the historic environment
- National Planning Practice Guidance (2014 onwards) (PPG)
- 6.6 Reading Borough Local Plan 2019
- CC1 Presumption in Favour of Sustainable Development
 - CC2 Sustainable Design and Construction
 - CC3 Adaption to Climate Change
 - CC7 Design and the Public Realm
 - CC8 Safeguarding Amenity
 - EN1 Protection and Enhancement of the Historic Environment
 - EN6 New Development in a Historic Context
 - EN12 Biodiversity and the Green Network
 - EN14 Trees, Hedges and Woodlands
 - EN15 Air Quality
 - EN16 Pollution and Water Resources
 - EN17 Noise Generating Plant
 - EN18 Flooding and Sustainable Drainage Systems
 - EM1 Provision of Employment Development
 - TR1 Achieving the Transport Strategy
 - TR3 Access, Traffic and Highways Related Matters
 - CR1 Definition of Central Reading
 - CR2 Design in Central Reading

CR3 Public Realm in Central Reading
CR13 East Side Major Opportunity Area
CR15 The Reading Abbey Quarter

6.7 Other relevant documentation

Sustainable Design and Construction Supplementary Planning Document (SPD) 2019
Reading Borough Local Plan Submission Draft Partial Update, May 2025
Historic England Advice Note 2 – Making changes to Heritage Assets 2025
English Heritage's Conservation Principles (2008)
Wildlife and Countryside Act 1981 (as amended)
The Conservation of Habitats and Species Regulations 2017

6.8 Local Plan Update

6.9 The current version of the Local Plan (adopted in November 2019) turned five years old on Tuesday 5th November 2024. The Local Plan was reviewed in March 2023 and around half of the policies in the plan are considered still up to date. However, the rest need to be considered for updating to reflect changing circumstances and national policy. A consultation version of the draft updated version of the Local Plan was published on 6th November 2024. Subsequent to this consultation a submission draft was sent to the Secretary of State on 9th May 2025. At the time of writing, the examination-in-public of the partial update to the local plan is in the process of taking place. Stage 1 hearings were held virtually on 11th and 12th November 2025. Stage 2 hearings are took place in February 2026.

6.10 Although there is a five-year period for carrying out a review of a plan after it is adopted, nothing in the NPPF or elsewhere says that policies automatically become “out of date” when they are five years old. It is a matter of planning judgement rather than legal fact whether a plan or policies within it are out-of-date. This will depend on whether they have been overtaken by things that have happened since the plan was adopted, either on the ground or through changes in national policy, for example.

6.11 Officer advice in respect of the Local Plan policies pertinent to this application is that they remain in accordance with national policy and that the objectives of those policies remains very similar in the submission draft updated Local Plan. Therefore, they can continue to be afforded weight in the determination of this planning application and are not considered to be ‘out of date’.

7. APPRAISAL

7.1 The main considerations are:

- Land use matters
- Design and impact on heritage assets
- Amenity
- Transport
- Flood risk
- Sustainability
- Trees, landscape and ecology
- Planning balance

7.2 Preliminary matters - basis on which the application is considered

- 7.2.1 Both the existing and proposed floorplans are marked out in the form of the building being in office use. No change of use is proposed as part of this application, for the change of use of the majority of the building (aside from part of the lower ground floor, ground floor and first floor associated with the northern block) benefits from prior approval for residential use (see introduction and planning history sections above for more details). Whilst the applicant has indicated that the proposed works are sought with the future residential use in mind, it is reiterated that no change of use is proposed as part of this application. Hence, it *could* theoretically be possible for an existing office use to continue throughout the site.
- 7.2.2 However, on the basis of the majority of the inside of the existing building having already been stripped out in preparation for an anticipated future residential use, together with the recent planning history, and the applicant openly presenting the proposals as being sought to facilitate that residential use (essentially as associated / operational development, outside of the scope of prior approvals), it is reasonable to consider the proposals on that basis of a residential use, but all within the context of the change of use not being applied for as part of this application. This therefore limits in some respects the considerations which would normally be applied had this proposal been a conventional (full planning permission) change of use from office to residential proposal.
- 7.2.3 It is also noted that part of the building remains in office use, with no prior approval for change of use for residential sought or permitted (part ground and first floor of the northern part of the building). This is explained in the proposals section above, with the applicant providing elevation plans showing phase 1 (the majority of the building, excluding parts of the ground and first floor of the northern part of the building) and phase 2 works (all parts of the building up to parapet level). The applicant has indicated that phase 1 will be carried out first, with phase 2 following if the commercial tenant vacates the building and separate permission for change of use to residential is granted. Ultimately the application seeks permission for works to all parts of the building and is considered on that basis, albeit the design section considers the possible scenario that only phase 1 is implemented, or there is a significant time delay between phases 1 and 2 being carried out.

7.3 Land use matters

- 7.3.1 The building is presently in office use, albeit the majority is presently vacant and has been stripped back internally in anticipation of the future change of use to residential following prior approvals in 2025 and 2026 (see relevant history above). As explained above, the building could theoretically remain in office use in the future. Whilst the proposed works as part of this application would undoubtedly make the attractiveness of the building for office use less straightforward, it is considered that it would not be impossible for it to continue to function as an office building, continuing to broadly align with Policies EM1 and CR1.
- 7.3.2 In terms of the existing office function still in use at the site, there would be harmful impacts to this occupier during the construction period (largely noise and disturbance), but this would largely be managed through the construction method statement. It is considered that post-completion of the phase 1 works and a residential use occurring, the office use could continue to operate from the site, with it including its own access for example.

7.3.3 As explained elsewhere, the residential use of the majority of the building has separately been established as part of previous applications at the site. Hence, from a land use perspective, again reiterating that no change of use is strictly proposed as part of this application, no land use principle matters are raised.

7.4 Design and impact on heritage assets

7.4.1 The main element of the proposal is to seek to alter the façade of the building from its existing curtain walling glazed form to a more conventionally styled residential appearance, with brickwork and punched window openings, supplemented by Juliet and projecting windows. This is all associated with the anticipated future residential use, as already permitted at the majority of the building. In advance of the submission of this application, a pre-application enquiry was submitted and, as part of this feedback advice was provided by the Reading DRP (summarised at section 4.8 above). Responses were also provided by officers at pre-application stage, including the specialist Conservation Officer owing to the sensitive location of the site in terms of nearby heritage assets and the building being highly visible in a number of locations in the local area. The local policy context includes Policies CC7, CC8, EN1, EN6, CR2 and CR15, with this last policy being particularly important as the site is within the Reading Abbey Quarter, with the Abbey being stated to be Reading's most significant heritage asset. The application submission includes a supporting design and access statement, heritage statement and a variety of visualisations. These have been carefully considered by officers at application stage.



Existing (left) and proposed east elevations (above) and visualisations (below)



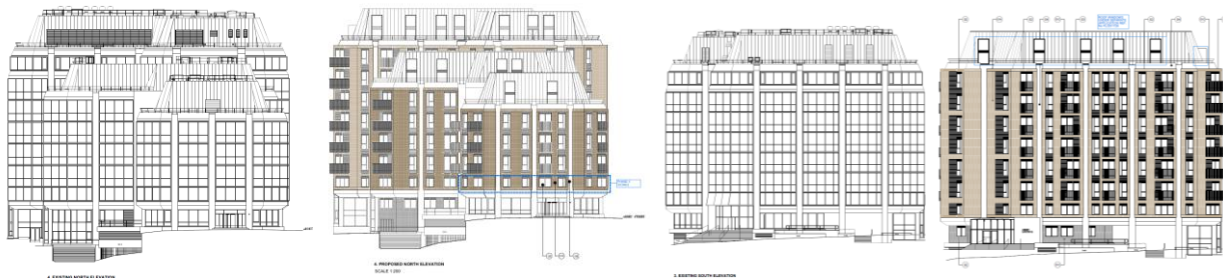
Below: Existing (left) and proposed views from Chestnut Walk



7.4.2 The use of brickwork is supported by officers, as it was by Reading DRP at pre-application stage. The applicant has chosen to bring the proposals forward with three main brick types, with a grey brick largely serving the southern block, a brown brick largely serving the central and northern blocks, charcoal/slate-blue brick to link and provide detail. The combination and location of the chosen brick types work successfully in the context of the nearby heritage assets, in particular the lighter brick being further away from the Abbey Ruins to avoid seeking to compete with its primacy. The changes in brick types across the building also help break up its overall massing into appearing as a series of structures, rather than a single block.



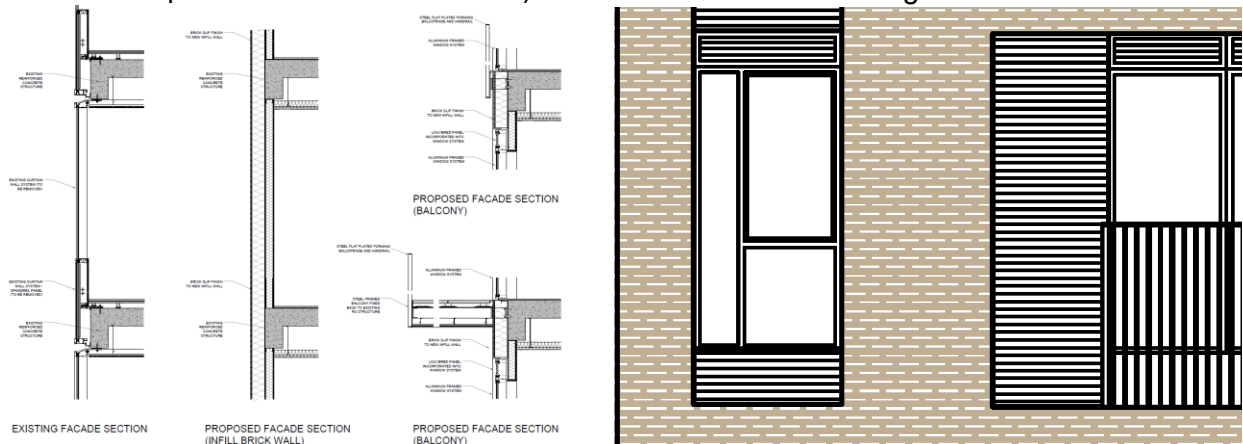
7.4.3 From a specific heritage perspective, the Conservation Officer is in overall terms satisfied with the proposals, as summarised at section 4.2 above. More specifically, the selection of three types of brick is considered to sufficiently retain the existing relationship with the Abbey Ruins, while keeping its harmony within the environment it is in. The proposed materiality would provide a subtle contrast to the settings of the heritage assets, not seeking to unduly compete with them.



Above left: existing & proposed north elevation. Above right: existing & proposed south elevation. Below: Existing and proposed views looking north towards the Abbey Ruins.



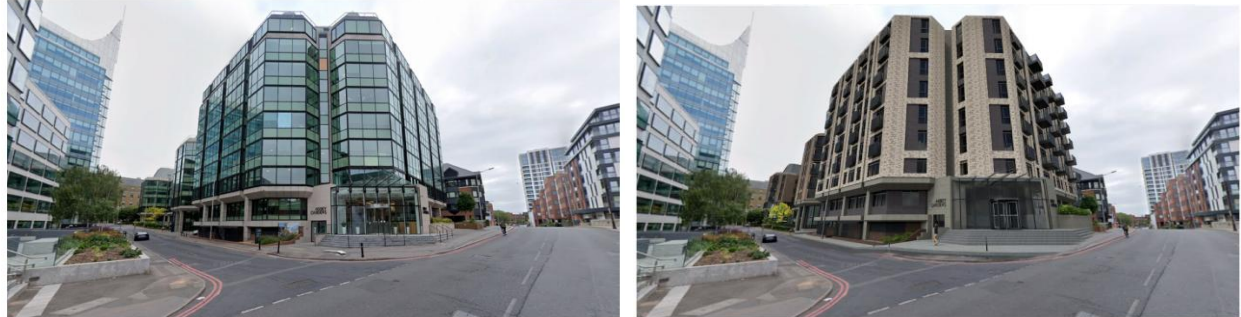
- 7.4.4 It is also welcomed that the applicant has indicated a suitable attention to detail in provided sectional plans to help understand the nature and extent of the brick slip system proposed for the buildings. This has provided reassurance to officers that the proposed system has been carefully advanced and has the potential to be implemented successfully. It is also welcomed that the applicant has complimented the proposed brickwork choices with high quality aluminium framed windows, galvanised steel protruding balconies (including complimentary painted soffits so as to maintain the appearance of the balconies from street level) and suitable juliet balconies too. The combined result is a coherent design response, which sits comfortably as a building in its own right (in the context of the anticipated future residential use) and within its sensitive setting.



- 7.4.5 In order to ensure that the new development responds positively to the local context and character a schedule of all new facing materials to be used for the external surfaces of the development will be secured via condition. In this specific instance this will include samples of the brickwork, mortar, joint profile and bond materials being provided on site for assessment, to see the proposed materials within the context of the surrounding context in practice. With this condition secured, the proposals are considered to comply with Policies CC7, EN1, EN6, CR2 and CR15.

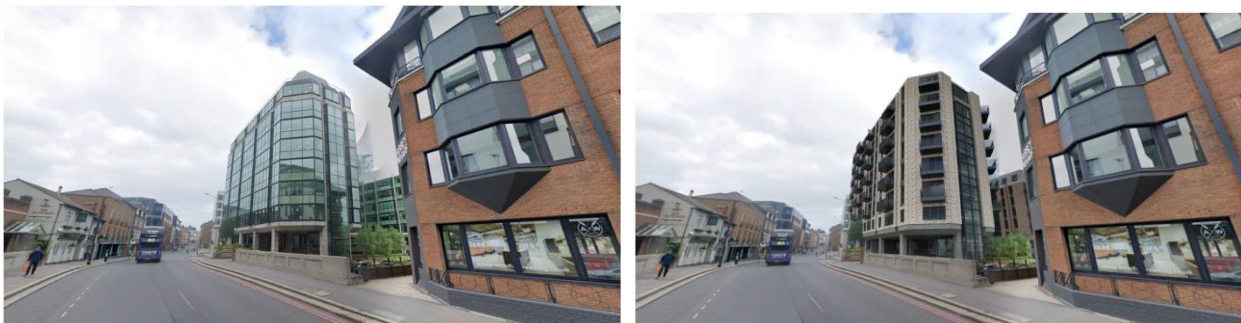


Above: Existing and proposed aerial views looking north-west. Below: Views from Kings Road.



7.4.6 It is also noted that the applicant has advised that in practice the proposals are likely to come forward in two separate phases, with the lower floors of part of the northern block unlikely to be implemented at the same time as the remainder of the building. Whilst this would result in an inconsistent appearance at this part of the building, it is on balance considered that the two would be able to sit alongside one another in a satisfactory manner, with this only anticipated to be the case for a temporary period. It would be a clear division between different uses at the building and would not significantly undermine the design approach of the building as a whole. Whilst not an ideal scenario, the applicant has been upfront in indicating this approach, whilst also providing details of the eventual overall appearance as part of the plans to be approved as part of the application.

7.4.7 It is also confirmed that the proposals would satisfactorily align with the roof level works already approved at the site (see relevant history section above), bearing in mind that these proposals involve no roof level works.



Existing and proposed views from Kings Road, looking west.

7.5 Amenity

- 7.5.1 Considering first the quality of accommodation provided for future occupiers, bearing in mind the applicant has openly indicated that the proposed works are associated with a future residential use, as permitted under separate applications, it is reasonable to consider the proposals on this basis, whilst acknowledging that a residential use could occur at the site with or without the proposed works.
- 7.5.2 The provision of Juliet balconies and protruding balconies for a significant number of the future residential units will be a benefit for future occupiers, by providing some beneficial outdoor amenity space / openings for the benefit of future amenity. Some concerns are presently raised that the close proximity of some balconies would actually result in harmful overlooking from future neighbouring units (and vice versa), so a strategy to protect the amenity of neighbouring and nearby occupiers from harmful overlooking and loss of privacy shall be secured via condition. In addition, specialist Environmental Protection and Transport officers are satisfied with the proposals, as summarised at section 4 above, again subject to conditions.
- 7.5.3 A particular focus of the consideration of the application has been on the impact of the proposals on the daylight and sunlight provisions for future occupiers. This was a consideration as part of the previous prior approval applications at the site, with the glazed nature of the building being helpful in the proposals being acceptable in that regard at prior approval stage. The potential concern is that the proposed works undermine that previous separate assessment, by altering the façade of the building and significantly reducing the size of the window openings, to the potential detriment of the future occupiers. As a consequence, the applicant included a light assessment as part of the supporting information with this application, with this being subject to independent review on behalf of officers during the course of the application.
- 7.5.4 The findings from this independent review, carried out by Hawkins Environmental, are summarised at section 4.7 above. It is evident that a series of potential concerns were initially raised, with the majority of these addressed through the submission of further information by the applicant. Hawkins follow up comments acknowledge this, but continue to raise concerns that the overall results have effectively been inflated by the non-inclusion of all spaces within a significant number of units. The final comments by the applicant continue to question this, with it clear that there is a difference of professional opinion in this regard.
- 7.5.5 Officers viewpoint is that it is clear that the proposals would worsen light provision for future occupiers, in comparison with the prior approval schemes. There would be a significant number of units which would not comply with the established BRE guidelines, which are acknowledged not to be mandatory requirements and need to be considered flexibly. With that in mind, together with residential properties being possible at the site with or without these works, which in other respects result in improvements for occupiers (e.g. Juliet and projecting balconies for many units, improved thermal performance), the reduction in light levels is a shortcoming of the proposal. However, when weighed against other quality of accommodation factors, the light shortfalls are not considered to harm the overall quality of accommodation to such an extent to represent a sustainable reason for refusal of this application, with future occupiers to be extent needing to proceed on a 'buyers beware' perspective in the context of the original prior approval nature of the residential use being accepted at the site and the town centre location of the site.
- 7.5.6 Turning to consider the impacts of the proposals on existing nearby occupiers, the proposals are not considered to result in any Policy CC8 harmful impacts to an extent to

seek to refuse the application on these grounds. There will be inevitable noise and disturbance during the construction period, but this is managed through the upfront CMS submitted as part of the application. This has been considered to be satisfactory, so a compliance condition will secure this, with separate licences also being needed from RBC Highways associated with the use of the PROW and oversailing matters. Through a combination of conditions, the limited extent of the external changes and information submitted by the applicant, the proposals are considered to be satisfactory in this respect.

7.6 Transport

- 7.6.1 Specialist transport officers have assessed the proposals, as summarised at section 4.4 above. In summary, the applicant will be required to seek separate highways licenses in respect of the proposed projecting balconies oversailing the PROW which runs through the site, with the applicant demonstrating that no other balconies would oversail the public highway. Informatives are recommended to be included on the decision notice in this respect. The CMS submitted has been assessed as satisfactory from a transport perspective, with the proposed works not changing or impact the parking or access arrangements or the Highway once the construction works have taken place, bearing in mind these matters have largely been considered under the separate prior approval applications at the site.

7.7 Flood Risk

- 7.7.1 Given the location of the site boundary within Flood zones 1, 2 & 3 (with the Holy Brook running beneath the building into the River Kennet) a flood risk assessment (FRA) has accompanied the application. The EA has confirmed contention with the FRA, subject to a compliance-worded condition. This will be duly added, in order to ensure the proposals comply with Policy EN18.

7.8 Sustainability

- 7.8.1 The applicant considers that the sustainability and environmental performance of the building is a planning benefit of the proposals, including an anticipated reduction in operational energy demand and improved thermal performance. The applicant has also submitted commentary, guarding against a formal BREEAM certification being required in this instance owing to the particular circumstances of this proposal. Officers have carefully considered the information provided by the applicant and acknowledge that these proposals do not fit neatly into the normal BREEAM requirements, given no change of use is proposed in this instance and that residential use has already been permitted under prior approvals, without the need for BREEAM assessments as part of those separate proposals. It is also pertinent that no additional floorspace is proposed as part of this application. Given the particular context of this application and the proposals in this instance, it is accepted that no formal BREEAM certification would be reasonable in this case.
- 7.8.2 The applicant has instead suggested that a life cycle analysis or sustainable procurement plan could be completed outside of the BREEAM assessment process, presumably via planning conditions. This has been carefully considered by officers, who consider that the information submitted at application stage is sufficient in demonstrating the sustainability credentials of the proposals, which by their very nature will result in betterments over the existing arrangements, with this being in line with the general thrust of Policies CC2 and

CC3. Accordingly, on this occasion and on the basis of the nature of these proposals, it is not considered necessary to secure further details via condition, with the application stage information demonstrating sufficiently compliance with policy.

7.9 Trees, landscape and ecology

7.9.1 With regards to trees and landscape matters, as per section 4.5 above, the proposals are considered to be appropriate subject to a compliance condition for the development to be carried out in accordance with the Tree Protection Plan submitted during the course of the application, in order to sufficiently protect the on-site and surrounding trees and landscaping.

7.9.2 Turning to consider ecological matters, ecological enhancements will be secured via condition, with the details submitted at application stage not satisfying the Council's ecology consultant. As per section 4.6 above, more lighting details and a Construction Environmental Management Plan (CEMP) for biodiversity are also required by condition, with there being a series of shortfalls in the information submitted at application stage by the applicant. A satisfactory bat survey has been submitted during the application and it is confirmed that the development is subject to the de minimis exemption in terms of biodiversity net gain.

7.10 Planning balance

7.10.1 In support of the proposals, during the course of the application the applicant has provided a supporting letter, summarising what the applicant considers to be the key benefits arising from the proposed development. These are specified in full below:

1. Architectural Improvements

The primary objective is to replace the existing "utilitarian" and "dated" commercial curtain wall with a high-quality residential façade.

- **Residential Character:** The new design uses a "punched" window rhythm and high-quality brickwork to better reflect its new function as a home rather than an office. This will improve the perceived quality of space, sense of belonging and security; leading to a greater emotional attachment to the building and contributing to its long term success.
- **Visual Interest:** The façade composition introduces variation in material tone and depth, assisting in breaking down the perceived scale of the building and reducing its visual massing at street level. This contributes to a more human-scaled appearance appropriate to its residential use. The addition of depth and detail to the façade will also provide additional articulation.
- **Heritage Sensitivity:** The proposal replaces a "negative contributor" with a design that provides a sympathetic contrast to nearby Grade I and II listed assets, such as the Reading Abbey Ruins and Reading Gaol. The Conservation Officer supports this view and has no objection to the proposed scheme.

2. Sustainability and Environmental Performance

Upgrading the building's envelope provides significant environmental benefits:

- **Carbon Reduction:** By retaining the primary structure and upgrading the exterior, the new façade is expected to significantly reduce operational energy demand over the building's lifespan.
- **Thermal Efficiency:** The new façade and high-performance glazing will deliver a major upgrade to the building's thermal performance.
- **Overheating:** The reduction of glazing will reduce overheating / solar gain, lowering internal temperatures during the summer and reduce reliance on active cooling.
- **Biodiversity Net Gain:** Although exempt from formal requirements, the project will deliver a net gain in biodiversity through the installation of bird and bat boxes.

3. Improved Occupant Amenity

The redesign focuses heavily on the quality of life for future residents:

- **Private Amenity Space:** The introduction of Juliette and projecting balconies provides much-needed private outdoor space for residents.
- **Natural Light:** Anstey Horne's assessment confirms that the development achieves high levels of daylight (80% compliance) and sunlight (92% compliance), ensuring future occupants have good access to natural light amenity.
- **Privacy:** Reducing the amount of glazing will serve to mitigate issues with overlooking / over exposure and provide a better sense of privacy and security. This is particularly the case for inward facing units at the internal corners of the building. A reduction in the use of blinds to constantly be drawn could lead to a net increase in internal daylight provision.
- **Acoustics:** The installation of new glazing will meet internal noise level standards (BS8233:2014) which is consistent with that achieved as part of the conversions approved as part of the prior approval applications.

4. Strategic Urban Development

- **Housing Delivery:** Whilst subject to a separate application, the project supports the conversion of the building into over 200 residential units in a highly sustainable town centre location.
- **Public Transport Links:** The site benefits from being in a highly sustainable location, less than a 10-minute walk from Reading Train Station and local bus routes.

7.10.2 The above has been considered by officers, with some benefits fully acknowledged and accepted, such as the architectural improvements, sustainability credentials and provision of private amenity space. These weigh in favour of the proposals. However, in other areas, the benefits specified by the applicant are not accepted, such as housing delivery (as these proposals do not involve the change of use of the building, so this cannot be applied) and future occupants having good access to natural light amenity. In terms of light matters, this is actually considered to be an evident shortfall of the proposals, as referenced separately above.

7.10.3 As with all applications considered by the Local Planning Authority, the application is required to be determined in accordance with the development plan unless material considerations indicate otherwise, as per Section 38(6) of the Planning and Compulsory Purchase Act 2004. Hence, the harmful impacts of the proposals need to be weighed against the benefits. In this instance, the harmful impacts in relation to reduced light provision are considered to be outweighed by the architectural, sustainability and other future amenity benefits (outdoor amenity spaces) of the proposals. Therefore, when applying an overriding critical planning balance of all material considerations, the merits of the proposals are such that in overall terms these benefits override the shortfalls, on balance and in this specific instance. Accordingly, within the context of national and local

planning policies and other material considerations, as detailed in the appraisal above, full planning permission is recommended to be granted, subject to a series of conditions, as set out below.

8. RECOMMENDATION & CONCLUSION

8.1 Grant Planning Permission, subject to conditions.

8.2 More specifically, on the basis of the above, it is considered that the application can be supported, subject to a series of recommended conditions:

Conditions:

1. The development hereby permitted shall begin no later than *three* years from the date of this planning permission.

Reason: In pursuance of Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004) in order to prevent an accumulation of unimplemented planning permissions.

2. The development hereby permitted shall ONLY be carried out in accordance with the following approved plans:

- 8-310.2 Rev P.01 - Proposed Ground Floor Plan – Phase 2
- 8-311.2 Rev P.01 - Proposed First Floor Plan – Phase 2
- 8-312 Rev P.02 - Proposed Second Floor Plan
- 8-313 Rev P.02 - Proposed Third Floor Plan
- 8-314 Rev P.02 - Proposed Fourth Floor Plan
- 8-315 Rev P.02 - Proposed Fifth Floor Plan
- 8-316 Rev P.01 - Proposed Sixth Floor Plan
- 8-317 Rev P.01 - Proposed Seventh Floor Plan
- 8-318 Rev P.01 - Proposed Roof Plan
- 8-400 Rev P.01 - Proposed Sections
- 8-400 Rev P.01 - Detail sections
- 8-500.2 Rev P.01 - Proposed East and West Elevation – Phase 2
- 8-501.2 Rev P.02 - Proposed North and South Elevation – Phase 2
- 8-502 Rev P.02 - Proposed South and Central Block Elevations

As all received on 27/02/2026

- 8-300 Rev P01 – BLOCK PLAN
As received on 20/05/2026

Reason: For the avoidance of doubt and to ensure that the development is carried out and adhered to in accordance with the application form and associated details hereby approved.

3. Prior to the relevant parts of the works commencing, a schedule of all new facing materials to be used for the external surfaces of the development shall be submitted to and approved in writing by the Local Planning Authority. Details shall include manufacturers specification details of all external facing materials (to be submitted to the Local Planning Authority) and samples of the brickwork and mortar materials, together

with joint profile and bond details are to also be provided on site of a minimum 1 square metre each – the approved details to then be retained on site and be available for inspection throughout the duration of the construction works. The development shall be carried out and thereafter maintained in accordance with the details approved.

Reason: These details are required due to insufficient information being contained within this submission and in the interests of visual amenity and ensuring the new development responds positively to the local context and character in accordance with Policies CC7, EN1, EN6, CR2 and CR15 of the Reading Borough Local Plan 2019.

4. Prior to the first use of any external balcony hereby approved, details of a strategy to protect the amenity of neighbouring and nearby occupiers from harmful overlooking and loss of privacy shall be submitted to and approved in writing by the Local Planning Authority. Details shall include the location, position, size, design, manufacturer's specification and ongoing maintenance arrangements of any measures proposed. The approved measures shall be installed in full prior to the first occupation of any residential unit at the site and permanently retained and maintained as such at all times thereafter.

Reason: To protect the amenity of future residential occupants at the site, in the interests of safeguarding the character and appearance of the building and ensuring the new development responds positively to the local context and character in accordance with Policies CC7, CC8, EN1, EN6, CR2 and CR15 of the Reading Borough Local Plan 2019.

5. * No development shall take place until a Construction Environmental Management Plan: Biodiversity (CEMP: Biodiversity) has been submitted to and approved in writing by the Local Planning Authority. The CEMP: Biodiversity shall include the following:
 - a) Risk assessment of potentially damaging construction activities.
 - b) Identification of "biodiversity protection zones".
 - c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
 - d) The location and timing of sensitive works to avoid harm to biodiversity features.
 - e) The times during construction when specialist ecologists need to be present on site to oversee works.
 - f) Responsible persons and lines of communication.
 - g) The role and responsibilities on site of an Ecological Clerk of Works (ECoW) or similarly competent person.
 - h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP: Biodiversity shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details.

Reason: To minimise impacts on biodiversity in accordance with Paragraphs 187 and 192 of the NPPF and Policy EN12 of the Reading Borough Local Plan 2019.

6. Prior to commencement of the development (excluding any demolition and site preparation works) a report detailing the internal (from windows facing the river) and external lighting scheme and how this will not adversely impact upon wildlife shall be submitted to and approved in writing by the Local Planning Authority. The report shall include the following figures and appendices:

- a) A layout plan with beam orientation
- b) A schedule of equipment
- c) Measures to avoid glare
- d) An isolux contour map showing light spillage to 1 lux.

The internal lighting (from windows facing the river Kennet) shall thereafter be implemented in accordance with the approved details prior to the first occupation of the relevant building for residential purposes and maintained as such thereafter.

Reason: To limit the impact of light pollution from artificial light on nature conservation, in accordance with paragraph 198 of the NPPF (2024) and Policies EN12 and EN16 of the Reading Borough Local Plan 2019.

7. A) Prior to commencement of the development (excluding any demolition and site preparation works), details of biodiversity enhancements, to include 1a) bird and bat boxes, or 1b) bird and bat bricks or tiles built into the walls of the building, and 2) proposals for native and wildlife friendly landscaping, shall be submitted and approved in writing by the Local Planning Authority. All bird and bat boxes should be installed in accordance with British Standard BS 42021:2022, and the submitted details shall include specification, location, installation details and monitoring and maintenance arrangements in line with BS: 42021:2022.

B) Prior to the first occupation of any part of the building for residential use, a brief letter report shall be submitted and approved in writing by the Local Planning Authority, confirming that the approved biodiversity enhancements have been installed. The report will include photographs of the features in situ and a simple plan showing their location. Thereafter the biodiversity enhancements shall be permanently retained and maintained in accordance with the approved details.

Reason: To secure the delivery of sustainable long-term biodiversity enhancements on site. This accords with Paragraph 193 of the NPPF, Policy EN12 of the Reading Borough Local Plan 2019, the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2017.

8. The measures within the approved Demolition and Construction Method Statement, namely Façade Demolition and Construction Plan prepared by Randalswood Construction Limited Rev 03 dated and received 19/05/2026, shall be adhered to throughout the whole of the demolition and construction period.

Reason: In the interests of protecting the amenity of local land uses or neighbouring residents, the character of the area and highway safety in accordance with Policies CC8, CR6 and TR3 of the Reading Borough Local Plan 2019.

9. Protective measures, including fencing, ground protection, supervision and working procedures shall be carried out throughout the demolition and construction stages of the development in accordance with the hereby approved Tree Protection Plan - Abbey Gardens, Reading by Randalswood, as received 30/04/2026.

Reason: In order to ensure that reasonable measures are taken to safeguard trees in the interests of local amenity and the enhancement of the development itself, in accordance with Policies CC7, EN14 and CR2 of the Reading Borough Local Plan 2019.

10. The glazing, ventilation and any other mitigation specified shall be installed in accordance with the specifications recommended within the Noise Assessment submitted with the application, namely Noise Impact Assessment Report by KP Acoustics Ltd Ref 28800.NIA.01 Rev E, dated 06/01/2026, as received on 26/01/2026. All measures will be completed prior to the first occupation of any residential unit at the site and thereafter the measures shall be permanently retained and maintained in accordance with the approved specifications.

Reason: In order to protect the amenity of future occupants of the proposed development in accordance with Policies CC8, EN16 of the Reading Borough Local Plan 2019.

11. The development shall be carried out in accordance with the flood risk assessment (Flood Risk Assessment by EAS Revision B, dated 26/01/2026, as received 04/03/2026) hereby approved and the mitigation measures contained therein. These mitigation measures shall be fully implemented prior to the first occupation for residential use (as approved separately) and subsequently in accordance with the scheme's timing/phasing arrangements. The measures shall be retained and maintained thereafter throughout the lifetime of the development.

Reason: To reduce the risk of flooding to the proposed development and future occupants, with the Environment Agency considering that the river is highly constrained at this location and the Environment Agency wish to secure the storage capacity of the floodplain, in accordance with Policy EN18 of the Reading Borough Local Plan 2019.

Informatives

1. The Local Planning Authority has worked positively and proactively with the applicant to resolve relevant matters to allow permission to be granted within the agreed extended timescale for the decision to be issued.
2. i) The attention of the applicant is drawn to Section 59 of the Highways Act 1980, which enables the Highway Authority to recover expenses due to damage caused by extraordinary traffic.
ii) Any works affecting the Highway shall be in accordance with Reading Borough's Council's document "Guidance Notes for Activities on the Public Highway within the Borough of Reading". The applicant should note that compliance with this document is mandatory and licences to work on the Highway will only be issued if the requirements contained within it are met. A copy can be obtained from the Council's website.
3. Your attention is drawn to the terms and conditions of this permission. Any development which is carried out but which differs materially from the approved plans and details, or does not comply with any condition(s) or planning obligation(s) attached to the permission may result in the Council taking action to remedy the breach of planning control. If you are in any doubt please contact the Council.
4. A Building Regulations application may be required for the proposed development. Please go to our website for more advice.

<https://www.reading.gov.uk/planning-and-building-control/building-control/apply-for-building-control/>

You can also find advice and submit an application using the Planning Portal.

5. Complaints are commonly received about noise and dust caused by construction and demolition works, particularly working outside reasonable hours and smoke from bonfires associated with the burning of waste on site. The developer is reminded that construction and demolition associated with the approved development will be subject to environmental health law.
6. You are advised that no tree works are approved by virtue of this consent. Any works to trees subject to a Tree Preservation Order will require submission of a tree works application.
7. The Environment Agency advises the following:

Environmental permit - advice to applicant

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

8. The proposed work should be in accordance with the Borough's Guidance Notes for Activities on the Public Highway. Any licenses required for the development can be obtained from the Council's website using the following link. <http://www.reading.gov.uk/maintenanceandroadworks>
9. Given balconies are proposed which oversail the Public Right Of Way (as shown on the information provided by you on 20th May) a section 177 license will be required. More formally, before any canopy/structure is erected a separate licence must be obtained, under Section 177/178 of the Highways Act 1980, for any part of it that overhangs the highway. A licence can be sought to be obtained from the Council's Highways section at 19 Bennet Road, Reading, RG2 0QX, telephone 0118 937 2138.
10. In accordance with Article 35 (DMPO 2015) some conditions have been highlighted (with a *) to make clear that they require approval from the Local Planning Authority before any development begins. This is because the details need to be designed or works implemented before any other works start on the site or are of a nature that it would be impractical to consider after work has started.

11. During the course of construction, the developer should take care to ensure that no part of this development (foundations, eaves, guttering, etc.) would encroach on, under or across the boundary line with the adjoining property, as the requisite Notice has not been served on the owner of that property. This permission does not confer any right of access onto land that is not under the developer's control. The developer should also be mindful of the obligations and requirements of the Party Wall Act (1996) details of which can be found at: www.communities.gov.uk/publications/planningandbuilding/partywall