

Inspector's Initial Comments and Questions to the Council Reading Borough Council response

23rd July 2018 (Amended 2nd August 2018)

This note sets out the Council's response to the Initial Comments and Questions to the Council provided by the Inspector into the Reading Borough Local Plan in July 2018. In many cases, the responses refer to evidence documents making up part of the evidence base, which provide more detail.

Appendix 1 also sets out a brief update on other matters arising since the date of submission in March, not covered by the Inspector's questions.

Meeting with representors/Statements of Common Ground

Q1. Is it the Council's intention to have any further discussions with representors? If so, could the Council please provide details and confirm when any Statements of Common / uncommon Ground are likely to be completed?

[Note: The second paragraph of this answer was amended on 2nd August 2018 to correct an error relating to who was contacted in May and June 2018]

After carrying out the consultation on the Pre-Submission Draft Local Plan, the Council considered and provided a response to representations (see LP006), made minor changes to the document to form the Submission version (see LP008) and published some additional evidence documents. It was therefore considered to be worthwhile to engage further with those who made representations to consider the degree to which representations had been resolved.

Therefore, during May and June 2018, the Council wrote to a number of those who made representations at Pre-Submission stage detailing the Council response to their representation and any changes proposed as a result. Not all representors were contacted, but it included those where there was considered to be a realistic prospect of resolution of issues. As a result, there have been the following updates.

Highways England

Highways England expressed a number of concerns around the Pre-Submission Draft Local Plan. However, in a telephone call on 1st March 2018, it was clear that the most substantive issue was the fact that the Council's Transport Modelling (EV005) had not taken account of the M4 Smart Motorway project.

Therefore, the Council asked PBA to revise the Transport Modelling work to take account of the M4 Smart Motorway scheme. A draft of this revised work was provided to Highways England on 10th July. At the time of writing, Highways England had initially responded to seek a meeting. The Council's intention, discussed in the March conversation, is to seek a Statement of Common Ground with Highways England by the deadline for Hearings Statements (12th September) on this matter to which the updated Transport Modelling would be an Appendix.

Historic England

Historic England made a large number of representations on the Local Plan at Pre-Submission stage. Most of these were positive in nature, but there were some concerns expressed as well. RBC has liaised with Historic England about whether

the changes made to the Submission version of the Local Plan address any of these concerns, and a draft Statement of Common Ground was sent to HE on 16th July. At this stage, RBC is awaiting HE's response.

British Sign and Graphics Association

A Statement of Common Ground with the BGSA has been signed in relation to the objections to policy OU4 on Advertisements. This is included at Appendix 2. The BGSA has agreed that the objections are largely resolved with the exception of an additional minor change to the text.

Natural England

Natural England made a number of comments on various elements of the document. Some, but not all, of these resulted in changes to the Submission Draft version. In response to RBC's communication, Natural England said that:

"Given that the Plan does not have the capacity to impact Nationally or Internationally designated sites of nature conservation, I do not think that we would consider it necessary to work towards an SoCG from our point of view. However I'm glad to see that a few changes have been made in order to account for our comments.

Having looked through your responses to our comments, I don't think there are any issues which present sufficient risk for us to be reiterating these points at examination."

The e-mail chain with Natural England is included as Appendix 3.

Thames Water

Thames Water made comments on various elements of the document, including on some specific sites. In response to RBC's communication, Thames Water confirmed that the changes made to the submission version address the points made. The e-mail confirming that is set out at Appendix 4.

Other representors

A number of other representors have written to confirm that they do not consider that their concerns have been addressed through the Council's responses or (where relevant) modifications. This included Rentplus, who provided significant additional material, although the Council's communication had made clear that it was not an opportunity for new comments.

A significant proportion of those who made representations at Pre-Submission stage have not responded, and the Council will advise the Inspector if further progress is made.

Q2. It would be helpful if the Council could provide an update on the Memorandum of Understanding with South Oxfordshire District Council?

At the time of Submission, the Duty to Co-operate Statement (EV001) indicated that a Memorandum of Understanding with South Oxfordshire District Council (SODC) is in process, and had been signed by Reading Borough Council but not

SODC. The version signed by Reading is included within the Statement at Appendix 12.

SODC signed the MoU shortly after the Local Plan was submitted, on 3rd April 2018. A final version of the signed MoU is included at Appendix 5.

Since the signature of the MoU, there have been significant changes in the timetable for submission of the South Oxfordshire Local Plan. At a Council meeting on 27th March, the decision was made to not submit the Local Plan in its current form. The issues relate to the availability and deliverability of a strategic site at Chalgrove Airfield. Council asked Cabinet to consider alternative options, and at its meeting on 10th May, Cabinet agreed that the 15 sites capable of forming a strategic allocation should be reassessed. This includes three sites adjoining the boundary with Reading. This work is underway, and Reading Borough Council is engaging with SODC on this work.

Core Evidence base

Q3. Is any other substantial work/reports likely to be undertaken for the examination, and if so what is the timetable for such work?

There are no substantial additional pieces of work or reports intended to be undertaken for the examination, other than the additional highways work referenced in answer to Q1. The Council submitted what it considers to be its full evidence base.

Dealing with Changes to the Local Plan

Q4. Please give an indication of the Council's position on main modifications?

The Council confirms that, under section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended), it wishes the Inspector to recommend main modifications as necessary.

Q5. Notwithstanding the wording of the covering note to the schedule of modifications LP008, some of the wording proposed and incorporated into the LP appears to change policy wording or the interpretation of policy. Would the wording changes within the Submission Plan have been apparent to the reader? Could the Council please comment on this?

The Council did not publish a tracked changes version of the Submission Draft Local Plan. Therefore, for those simply reading the Submission Draft Local Plan, the changes made since Pre-Submission Draft stage would not necessarily have been apparent. However, the Schedule of Minor Changes (LP008) was published on the website at the same time as the Submission Draft Local Plan, and this clearly points to the changes within the document. This is in line with how the Council has dealt with submission documents in the past.

In addition, the Council wrote to those who made representations on the Pre-Submission Draft Local Plan during May, June and early July 2018 to highlight the responses to representations and where the Council had made changes in response to their comments. In each case, the e-mail contained either an extract from the

list of representations or responses and the schedule of changes, or links to the documents online. The changes should therefore be apparent on the basis of the documents that the Council has published.

If the Inspector considers it worthwhile, a tracked changes version of the Submission Draft Local Plan can be added to the list of Examination documents, although it will not be practically possible to do so for the two changes to the Proposals Map.

In more general terms, the Council's view is that the changes made to the Submission Draft Local Plan are very much minor in nature, and whilst in some cases detailed policy wording is altered, the policy approach is not materially affected. As such, it is considered that the changes made are appropriate at this stage. The approach the Council has taken is in line with the submission of previous Local Development Framework documents.

Neighbourhood Plans

Q6. Are there any Neighbourhood Plans in preparation within the Borough? If so what stage have they reached?

There are no Neighbourhood Plans either in place or in preparation within Reading. There are no parishes within Reading, nor are there any other existing or proposed designated neighbourhood areas at this stage.

Whole Plan Viability

Q7. What evidence is there for assessing the effect of the policies on the viability of development where they set out infrastructure requirements or contributions? If this is not available what steps would be needed to rectify this?

The effect of the policies on the viability of development is assessed in the Local Plan Viability Assessment (EV006). Although the text of the document itself focuses on the levels of affordable housing that should be required, this reflects the fact that this is the single biggest factor affecting viability, and where different requirements can have result in the most significant variance in viability. However, the document nonetheless incorporates the other main requirements of the Local Plan into the viability testing, factoring in matters such as the current Community Infrastructure Levy charges, the zero carbon homes requirement and, since the scenarios used are based in most cases on policy-compliant development, the use of the national space standards outside the town centre. The Assessment demonstrates that the requirements of the Local Plan can be met without an adverse effect on viability of development.

Housing Supply

Q8. Would the Council be able to demonstrate a five year housing land supply, including an appropriate buffer, at the point of adoption of the LP should it be found sound? Please provide evidence to demonstrate how.

The Council will be able to demonstrate a five-year supply at the point of adoption. The Housing Implementation Strategy (EV012) sets out in detail how the

five-year supply is calculated. For the five-year period 2018-2023, it has been calculated that Reading has 6.60 years' supply (see Table 3 of EV012). This includes a 5% buffer, based on generally good historic delivery against targets, as set out on pages 4-5 of the Housing Implementation Strategy alongside background as to why this buffer is appropriate. The Housing Implementation Strategy further demonstrates how a five-year supply will be maintained throughout the plan period.

Q9. Tables on pages 162, 179, 194, 201 and 210 - what is the current position on sites with planning permission?

The Council undertakes annual monitoring of the progress of planning permissions. The most recent exercise was for the 2017-18 monitoring year, with site visits carried out during April and May 2018. In most cases, the progress of the planning permissions below is derived from that exercise, unless there is more recent information available.

Site	App ref	Summary of development	Current position
Central Reading			
Energis House, Forbury Road	121826	Redevelopment for two new office buildings of 40,000 sq m total (under construction)	Development complete at April 2018
Kings Meadow Pool, Kings Meadow Road	141604	Extension, alteration and restoration of open air swimming pool for pool, spa and restaurant (under construction)	Development complete at April 2018
Jacksons Corner, 1-9 Kings Road	141713	Change of use and redevelopment for 28 dwellings and retail use	Development had commenced by April 2018
83-85 London Street	141720	Change of use of offices to 11 dwellings	Unimplemented. Prior approval has now expired.
60 Queens Road	141834	Change of use of offices to 30 dwellings	Unimplemented. Prior approval has now expired.
Kings Point, 120 Kings Road	150019	Redevelopment for 103 dwellings (under construction)	Development remains under construction at April 2018
173-175 Kings Road	151116	Change of use of listed offices to 13 dwellings (under construction)	Development complete at April 2018
Havell House, 62-66 Queens Road	151455, 151456, 151457, 151458	Change of use of offices to 13 dwellings	Development not yet started.
Primark, 32-42 West Street	152269	Reconfiguration from retail to offices and retail (under construction)	Development remains under construction at April 2018
34-36 Crown Street	160090	Change of use of offices to 14 dwellings (under construction)	Development complete at April 2018
Kings Lodge, 194 Kings Road	160158	Change of use of offices to 14 dwellings (under construction)	Development remains under construction at April 2018
160-163 Friar Street	160212	Change of use of offices to 28 dwellings	Development not yet started.

Former Gas Works Building, Gas Works Road	160378	Change of use and extension for 20 dwellings	Development not yet started.
Building 1, New Century Place, East Street	161601	Change of use of offices to 75 dwellings	Development had commenced by April 2018
Building 2, New Century Place, East Street	161602	Change of use of offices to 58 dwellings	Development had commenced by April 2018
9 Southern Court, South Street	162305	Change of use of offices to 16 dwellings	Development had commenced by April 2018
3-4 Wesley Gate, Queens Road	170314	Change of use of offices to 14 dwellings	Development had commenced by April 2018
Clarendon House, 59-75 Queens Road	170905	Change of use of offices to 49 dwellings	Development has commenced since April 2018
South Reading			
Plot 8, 600 South Oak Way	070488	Development for offices (20,430 sq m)	Development not yet started.
Madejski Stadium, Royal Way	101623	Expansion of football stadium (28,442 sq m net gain)	Development not yet started.
Lok n Store, 5-9 Berkeley Avenue	101656	Redevelopment for 112 dwellings	Development had commenced by April 2018
Green Park Village, Longwater Avenue	102172	Development for 737 dwellings, extra care housing, offices (16,000 sq m), primary school, community use (381 sq m), retail and related facilities (684 sq m) (under construction)	At April 2018: <ul style="list-style-type: none"> • 86 dwellings completed; • 239 dwellings under construction (includes extra care); • 461 dwellings not started; • No non-residential development yet started; • Majority of remaining phases now have reserved matters approval.
Foudry Place and 22 Commercial Road	120408	Remainder of permission for development for offices (2,295 sq m) and serviced apartments (1,400 sq m)	Remainder of development not yet started.
Kennet Island Phase 3, Manor Farm Road	121062	Development for 546 dwellings (under construction)	At April 2018: <ul style="list-style-type: none"> • 453 dwellings completed; • 85 dwellings under construction; • 8 dwellings not started.
21 Rose Kiln Lane	140542	Redevelopment for retail warehouse (net reduction in floorspace) (under construction)	Development complete at April 2018
Reading Girl's School, Northumberland	140708	Redevelopment for new secondary school (5,101 sq m net gain) (under	Development complete at April 2018

Avenue		construction)	
Plot 17, 500-600 Longwater Avenue	141447	Development for offices (22,540 sq m)	Development not yet started.
Land west of A33 and north of Island Road	141789	Development for industrial/warehouse (24,200 sq m) (under construction)	Development complete at April 2018
Land west of Longwater Avenue	141944	New railway station (6,106 sq m)	Development not yet started, but delivery of Green Park Station still expected in Summer 2019
177 Basingstoke Road	150715	Development of student accommodation for 34 bedspaces (under construction)	Development remains under construction at April 2018
Warwick House, Warwick Road	151407	Development for 10 dwellings*	Section 106 signed and permission issued 17 th April 2018. No development progress at last monitoring.
Worton Grange	151944, 161496	Development of 175 dwellings, industrial/warehouse units (2,452 sq m), car showrooms (2,510 sq m), hotel (4,134 sq m), retail and related uses (6,075 sq m) (under construction)	At April 2018: <ul style="list-style-type: none"> • 33 dwellings completed; • 89 dwellings under construction; • 53 dwellings not started; • Industrial units and part of retail completed; • Hotel and remainder of retail under construction; and • Car showrooms not started.
Lancaster Jaguar, Bennet Road, Reading	152071	Extension of vehicle dealership (3,078 sq m net gain) (under construction)	Development complete at April 2018
Land at the Madejski Stadium	160199	Development for up to 626 dwellings, convention centre and ice rink, 246 bedroom hotel, up to 102 serviced apartments, decked car parking, ancillary retail, open space, transport interchange*	Permission is still subject to the signing of S106 agreement. Development not yet started.
400 Longwater Avenue	160569	Development for offices (27,207 sq m)	Development not yet started.
West Reading			
1025-1027 Oxford Road	070937	Development of 12 dwellings	Development not yet started.
Government Offices, Coley Park, Wensley Road	151173	Redevelopment of offices for 71 dwellings (under construction)	At April 2018: <ul style="list-style-type: none"> • 33 dwellings completed; • 38 dwellings under construction.
Elvian School, Bath Road	151175	Development of former school for 118 dwellings and new secondary school	At April 2018: <ul style="list-style-type: none"> • 35 dwellings completed; • 63 dwellings under

		(approximately 6,000 sq m net gain of education) (under construction)	<p>construction;</p> <ul style="list-style-type: none"> • 20 dwellings not started; • School under construction.
1 Castle Crescent	151924	Conversion and additional development for 14 dwellings	Development had commenced by April 2018
10 Cremyll Road	152242	Change of use from snooker hall to place of worship (under construction)	Development remains under construction at April 2018
St Georges Hall, St Georges Road	152301	Church extension and development of 12 dwellings	Development had commenced by April 2018
26 Portman Road	160084	Change of use and refurbishment from car servicing to warehouse (under construction)	Development complete at April 2018
62 Portman Road	161345	Extension to self-storage facility (under construction)	Development complete at April 2018
Land at Conwy Close	161390	Development of 57 dwellings	<p>At April 2018:</p> <ul style="list-style-type: none"> • 42 dwellings under construction; • 15 dwellings not started.
72 Bath Road	170614	Conversion of 7 serviced apartments to 13 dwellings	Development not yet started.
Caversham and Emmer Green			
Chazey Farm, The Warren	030275	Development of 78-bed nursing home	Development not yet started.
Unit 1, Paddock Road Industrial Estate	100384	Development for industrial/warehouse units totalling 1,577 sq m	Development not yet started.
St Martin's Precinct, Church Street	140997	Redevelopment for retail (501 sq m net gain), restaurant (524 sq m net gain), leisure (652 sq m net gain), residential (40 dwellings) plus additional works	Development not yet started.
The Arthur Clark Home, Dovedale Close	152277	Development of former care home for 43 extra care apartments	Development had commenced by April 2018
East Reading			
Royal Berkshire Hospital, London Road	Various	Additional hospital floorspace outstanding under existing outline permissions	No further reserved matters have been granted or additional development carried out under the outline permission.
University of Reading, The Chancellors Way & Shinfield Road	100726	Development of 151-bed hotel and conference centre	Development not yet started - site is in use for temporary university buildings.
84 Watlington Street	111073	Extension and conversion of pub for 10 dwellings (under construction)	Development remains under construction at April 2018

<i>Wells Hall, Upper Redlands Road</i>	<i>121820, 140428</i>	<i>Redevelopment of halls of residence for 34 dwellings (under construction)</i>	<i>Development complete at April 2018</i>
<i>252 Kings Road</i>	<i>141986</i>	<i>Change of use and extension of offices to student accommodation (under construction)</i>	<i>Development complete at April 2018</i>
<i>Princes House, 73a London Road</i>	<i>150685</i>	<i>Change of use of offices to 26 dwellings</i>	<i>Unimplemented. Prior approval has now expired.</i>
<i>University of Reading, London Road</i>	<i>150730</i>	<i>Conversion of existing buildings to 53 dwellings (under construction)</i>	<i>Development complete at April 2018</i>
<i>40 Silver Street</i>	<i>150885</i>	<i>Development for 14 dwellings</i>	<i>Development not yet started.</i>
<i>1a Upper Redlands Road</i>	<i>150890</i>	<i>Development of 10 dwellings (under construction)</i>	<i>Development complete at April 2018</i>
<i>35 Christchurch Road</i>	<i>151034</i>	<i>Conversion of house in multiple occupation into 10 dwellings</i>	<i>Development not yet started.</i>
<i>Aspen House, 300 Kings Road</i>	<i>170512</i>	<i>Change of use of office to 78 dwellings</i>	<i>Development had commenced by April 2018</i>
<i>79 Silver Street</i>	<i>170685</i>	<i>Development of building for 56 student rooms</i>	<i>Development not yet started.</i>

**Development was permitted subject to S106 at time of Submission Draft Local Plan*

In general terms, the documents monitoring the progress of planning permissions for 2017-18 (Residential Commitments at 31 March 2018 and Non-Residential Commitments at 31 March 2018) were published in June 2018. These are available on the Council's website¹.

The headline figure is that 700 homes (net) were completed in 2017-18. This is above the objectively assessed need of 699 and Local Plan figure of 671, but below what was anticipated in the Local Plan Housing Trajectory for 2017-18 (818). The main reason for the difference is that a single block of 129 apartments at Green Park that was expected to have been completed was still in the final stages of construction at the time of the survey.

A large number of new residential permissions were issued (1,402), but generally these were on sites that were already known and therefore had already been taken into account in the Housing and Economic Land Availability Assessment (EV014 & EV015), so would not make a material difference to the overall housing supply calculations.

Q10. Paragraph 10.2.2 - a number of sites in the table are referred to as being 'long term' or 'unknown' - for each site (with the exception of Grazeley) could the Council please explain what the reasons are for this?

These are generally sites where there is no confidence that the site (or part of the site) will become available during the plan period. However, the Council considers that these sites are nonetheless important and that the Local Plan should advocate their development and provide policy guidance in case they come forward.

¹ www.reading.gov.uk/readingldf

In general, the vast majority of development in Reading takes place on sites which were formerly in another use. This means that sites can become available quite quickly when uses cease, and can result in planning applications that require some guidance from the development plan. For this reason, where a site has particular significance (e.g for reasons of potential heritage issues or its importance as part of a wider grouping of sites) but its availability cannot be confirmed, Reading Borough Council generally seeks to identify it as an allocation in the event that it comes forward. An example of how this has worked is the site of Reading Prison. This site was initially identified as an allocation in the Reading Central Area Action Plan (adopted 2009). At the time, there were no indications that the site was likely to become available. However, due to the particular importance of the site, it was considered necessary to identify it as an allocation in any case, in case it came forward, and it was therefore identified as 'aspirational'. In the event, Reading Prison closed in 2014, and the allocation provided a basis for the Council to enter pre-application discussions on the site and prepare a more detailed Development Framework.

Where a site, or part of a site, is listed as 'Longer term/unknown' in 10.2.2, development figures from those sites do not count towards the anticipated development in the Housing and Economic Land Availability Assessment or the Housing Trajectory/Five Year Housing Land Supply. Development on these sites would therefore be over and above the figures set out in those calculations.

Supplementary Planning Documents

Q11. For each of these listed below could the Council please confirm the date of production where this is not defined, and also it's planning status?

- Sustainable Design and Construction
- Station Area Framework
- Station Hill South Planning and Design Brief
- Kenavon Drive Urban Design Concept Statement
- Dee Park Planning Brief
- Whiteknights Development Plan

The date and status of each document is set out below:

- *Sustainable Design and Construction SPD:*
This is a formal SPD, was adopted in July 2011, and relates to policies CS1 and CS2 of the Core Strategy. It remains as relevant SPD, although some parts of the document have been superseded by events such as changes to building regulations and the withdrawal of the Code for Sustainable Homes. It is the Council's intention to bring forward a replacement Sustainable Design and Construction SPD immediately after adoption of the new Local Plan.
- *Reading Station Area Framework:*
This is a formal SPD, was adopted in December 2010, and provides more detail on policy RC1 of the Reading Central Area Action Plan. It remains in place as SPD, and would continue to apply under policy CR11 of the new Local Plan, as stated in paragraph 5.4.9. Whilst policy CR11 does have some changes from its predecessor RC1, notably additional land being brought within the policy, there are no changes to the policy that would

render the Station Area Framework out-of-date. It covers most of the area covered by policy CR11 of the emerging Local Plan, with the exception of CR11f and CR11i and part of CR11d.

- Station Hill South Planning and Urban Design Brief:
This is a formal SPD, was adopted in March 2007, and provides more detail on policy CEN13 of the 1998 Local Plan. The Reading Central Area Action Plan (adopted 2009) subsequently identified this and additional sites as part of a wider Major Opportunity Area, and stated in table 9.2 that the Brief will continue to guide planning applications. It would continue to apply under policy CR11 of the Local Plan, as stated in paragraph 5.4.9. It operates alongside the Reading Station Area Framework, with the RSAF providing the wider framework for areas both north and south of the station, and the SHSPUDB providing more detail on this specific site. Its coverage equates to sites CR11a, CR11b and CR11c of the emerging Local Plan.
- Kenavon Drive Urban Design Concept Statement:
This is a formal SPD, was adopted in July 2004, and originally supplemented policies in the 1998 Local Plan. The Reading Central Area Action Plan (adopted 2009) subsequently identified this and additional sites as part of a wider Major Opportunity Area, and stated at paragraph 6.33 that the KDUDCS remains relevant. Whilst it does remain formal SPD, paragraph 5.4.28 of the Submission Draft Local Plan recognises that it is now some years old and that proposals in the area have developed somewhat, and that Local Plan policy CR13 takes precedence. It covers sites CR13b (part), CR13c and CR13d of the emerging Local Plan, as well as sites where development has now been completed.
- Dee Park Planning Brief:
This is a formal SPD, was adopted in December 2008, and provides more detail on the identification of Dee Park for area regeneration on the Core Strategy key diagram. Subsequently, the Sites and Detailed Policies Document (adopted 2012) included policy SA4 which is consistent with the Planning Brief, and which reasserted that the Planning Brief would continue to operate alongside the policy. Its coverage is the same as policy WR1 of the emerging Local Plan, and it would continue to apply under policy WR1, as stated in paragraph 7.3.4. The entire Dee Park development is covered by an outline planning application, and phases 1 and 2 are already complete. No reserved matters for Phase 3 have yet been applied for, and the policy and SPD are required to remain in place to guide the reserved matters, or, potentially, a different full application for the final phase.
- Whiteknights Development Plan:
This has no formal policy status. It was produced in 2008 by the University of Reading to set out its intentions for its own Whiteknights Campus. Although Reading Borough Council was consulted on the Development Plan, the Council never sought to formally approve this document as policy. As such, it provides useful context for understanding how developments on the campus fit into a wider plan, but would not be used for development management purposes. It covers the whole Whiteknights Campus, including the area identified as ER2 in the emerging Local Plan as well as the rest of the campus within Wokingham Borough.

Built and Natural Environment

Q12. Policy EN12 - in the penultimate sentence what is meant by 'nationally or locally recognised metrics'?

The supporting text to EN12 (paragraph 4.2.63) provides more detail, and states that:

"There are established metrics for considering off-site mitigation at a national level, including those described in DEFRA's biodiversity offsetting guidance, and more specific local metrics may be produced during the plan period."

This reference includes a footnote link to DEFRA's biodiversity offsetting guidance from 2012². This was a metric for a pilot study, intended to inform an overall national government policy on biodiversity offsetting. However, this has not yet been taken forward. In the absence of any alternative metrics for assessing off-site mitigation, the 2012 work represents a reasonable basis for application of the policy. However, the policy does need to recognise that this work may or may not be taken forward by government, and that if it is not there is potential for more locally-based work to fill the gap. For that reason, it is not considered appropriate for the policy to refer to one specific metric.

Q13. In paragraph 4.2.85 - What is meant by the Council reviewing its approach to air quality, and are there any implications for Policy EN15?

The reference in paragraph 4.2.85 relates to the situation after publication of the Government's Air Quality Plan. In this plan, DEFRA modelling indicated that Reading was not expected to be in breach of NO₂ levels by 2020. However, it should be noted that Reading's modelled levels fell below the legal requirements in 2020 by a slim margin. The Council is clear therefore that, regardless of the requirements of the Air Quality Plan, there is a continued need to undertake measures to improve air quality in Reading and keep actions in the Air Quality Action Plan under review. The Council's Strategic Environment, Planning and Transport Committee considered a report on 19th March 2018 about air quality in Reading, and agreed that a feasibility study to bring about compliance with NO₂ limits on specific roads be submitted by the end of June deadline, and that

"... any funding arising would inform a refresh of the current Air Quality Action Plan alongside changes currently being developed/delivered to the Local Plan, Local Transport Plan and the Joint Strategic Needs Assessment"³.

There is therefore expected to be a refresh of the Air Quality Action Plan, and continued efforts to ensure compliance with limits across the plan period.

There are not expected to be significant implications for the effectiveness of policy EN15. The policy has been drafted in conjunction with the Council's Environmental Protection section, with responsibility for the AQAP, and it is

²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69531/pb13745-bio-technical-paper.pdf

³ See minutes of SEPT Committee, 19th March 2018, <http://committee.reading.gov.uk/TROVEPROGS/TROVEIIS.DLL?/IS=948457975/LI=Committee+Minutes+Library/ID=40/OS=156/DI=5992/DS=6005/LO=1/RW=2560/RH=1080/CD=32/VD=committee/WV=7/ST=ac/AC=AP/Fl=688/HU=EmptyURL>

considered to represent a robust policy position. As demonstrated by the Committee decision above, the AQAP is expected to complement the approach to air quality in the Local Plan rather than contradict it. Many likely measures in the AQAP involve interventions other than through development management policy, with the production of a new Local Transport Plan playing a particularly significant role. There remains the possibility of a Supplementary Planning Document on Air Quality should there be revisions to the approach that require more detail than the overall approach in EN15, but this is not currently programmed.

The background to policy EN15 is set out in more detail in section 4.24 of the Local Plan Background Paper (EV002).

Employment

Q14. Paragraph 4.3.8 - What is the likelihood of a freight consolidation centre coming forward and will it be clear to the decision maker how to react to such a proposal?

The Council is not aware of any current proposals for a freight consolidation centre, and has no particular information on whether such a development is likely over the plan period. Where freight consolidation centres have been provided (e.g. Bristol and Bath, London) these have generally been initiated by the relevant local authority or authorities. Whilst Reading Borough Council has no current plans for such a centre, it does offer a potential measure to help to improve NO2 concentrations, particularly around the town centre. The reference is therefore worthy of inclusion in the event of such a proposal.

It is considered that the wording as proposed makes it clear how a decision-maker will react. In general, they should be considered in line with relevant policies in the plan, but EM1 indicates that subject to these policies the presumption should be to support such a proposal.

Housing

Q15. Paragraph 4.4.13 - what is the latest position on the Register for Self-Build Homes?

At June 2018, there were 145 entries on the Self-Build Register.

In terms of supply, the best source for identifying self-build homes is by the granting of Community Infrastructure Levy self-build relief. Since CIL was introduced in Reading in April 2015, self-build relief has been granted for only 15 new dwellings. Of these, 2 had been completed by April 2018, 7 were under construction, and the remainder were not started. Although there may still be a self-build homes being delivered that predate CIL, the numbers are likely to be very small, and current policies are clearly not therefore delivering adequate self-build homes to meet the demand on the Self-Build Register.

Q16. Policy H5 - what is the evidence for applying the optional technical standards as policy?

The evidence to support the optional technical standards in policy H5 is set out in section 4.36 (pages 119-129) of the Local Plan Background Paper (EV002). The points below provide a very brief summary, but the Background Paper discusses it in more depth.

Space standards

The evidence for applying the nationally described space standards in Reading centres around analysis of recent developments and existing planning permissions. It became clear that there was a clear difference between town centre developments, which would have largely struggled to meet the space standards, and developments in other locations, where the space standards would largely have been met. It was clear that requiring space standards in the town centre would stifle supply, whereas it would not elsewhere. This reliance on smaller dwellings in the town centre makes it more essential to provide more spacious dwellings, often more appropriate for families, elsewhere.

These past developments and recent planning permissions used in the analysis were taken from those schemes that fed into the Local Plan Viability Assessment (EV006), and therefore the viability of the policy requiring compliance with the space standards outside the town centre has been taken into account.

Water efficiency

Planning Practice Guidance (56-015-20150327) states that justification for adopting this stricter standard should be based on existing evidence, consultation with the local water and sewerage company, the Environment Agency and catchment partnerships, and information on viability and housing supply.

The Thames Water area, within which Reading falls, has been identified as a 'water stressed area' by the Environment Agency in their publication Water Stressed Areas - Final Classification (July 2013). The Thames River Basin Management Plan (December 2015) identifies demand management measures as being necessary to address changes to the natural flow and level of water and therefore to achieve objectives of the plan. Thames Water's Water Services Infrastructure Guide for Local Planning Authorities gives clear support for local authorities in pursuing stricter water efficiency standards. Both the Environment Agency and Thames Water have supported the Council's stance in this part of policy H5 through consultation.

No effect on housing delivery is likely, as, under existing policies before withdrawal of the Code for Sustainable Homes, all new homes would have needed to comply with the equivalent water efficiency standard for both Code Level 3 (105 litres/person/day). Adoption of the national standard is actually therefore a slight reduction on what has been sought historically.

Accessibility

In terms of adaptable and accessible homes (part M4(2) of the Building Regulations), it is anticipated that there will be a 78.1% increase in people with mobility problems in Reading up to 2036. However, simply applying a policy requirement based on a need resulting from this figure ignores the purpose of these types of homes, which is to allow people to remain in the home despite changing circumstances such as age or disability. The specific homes where this

will arise cannot be predicted. Logically therefore, if needs arising are to be met, it should apply to all new-build homes. The Council already operates a 100% Lifetime Homes requirement in policy DM5 of the Sites and Detailed Policies Document, and there are strong similarities between adaptable and accessible homes and Lifetime Homes, with both entailing simple design measures that place a very small cost per dwelling that should have negligible effects on viability.

In terms of wheelchair accessible and adaptable homes (part M4(3) of the Building Regulations), the Council has used a methodology set out by Habinteg for calculating existing unmet needs for wheelchair homes, and has then sought to apply the expected increase in mobility problems as assessed by the SHMA to this base. On this basis, a need for 460 additional wheelchair homes is identified, which represents 2.86% of the objectively assessed need. However, this proportion cannot be applied through policy, as a threshold will need to be set above which the policy results in at least a whole unit being delivered. The conclusion is that a proportion of 5% from developments of 20 dwellings or more is required to meet these needs.

Q17. Policy H6 - what is the status and age of the Housing Strategy referred to within this Policy?

The Council's most recent Housing Strategy, 'Firm Foundations'⁴, covers the period 2009 to 2014. As such, it is no longer up-to-date, and would be of very limited relevance in applying this policy. However, the Council is in the early stages of preparation of a new Housing Strategy, and one of its tasks would be to identify any priorities for the provision of accommodation for vulnerable people. Timescales for production of the Housing Strategy are set out in our most recent Corporate Plan 2018-2021, agreed by Council on 26th June, and involve consultation between July and September 2018 and adoption in November 2018.

The reference in the policy is designed to be applicable to whichever the most recent Housing Strategy is, rather than a specific, dated document. Housing strategies tend to cover much shorter periods than Local Plans, typically five years, and specific needs for vulnerable groups may change during that period, particularly because they may relate to relatively small numbers of people. For that reason, references to housing strategies need to be flexibly worded.

Q18. Paragraph 4.4.96 what is the evidence relating to student numbers produced by the University?

A note on additional needs for student accommodation was prepared by Cushman and Wakefield to support a planning application for additional student accommodation at the existing St Patrick's Hall on Shinfield Road, which was refused in February 2018. This site is included as a proposed allocation for student accommodation within the Local Plan, albeit with a lower capacity figure than proposed by the University. The note was also submitted by the University of Reading and UPP as part of their representations to the Pre-Submission Draft Local Plan, and can be read in full within the copies of representations (LP007) at pages 1341-1363.

This note stated that the University has grown full time student numbers by 18% between 2010/11 and 2015/16, which outstrips the national average of 5%.

⁴ <http://www.reading.gov.uk/media/2498/Housing-Strategy-2009/pdf/Housing-Strategy-2009.pdf>

According to this note, the proportion of students of 20 and under is 59% and the proportion of overseas students is 29%, well above the respective national averages of 51% and 23%, and these are groups that are particularly reliant on purpose-built accommodation. The note does not put a figure on the need for new accommodation, but does note that there has been a 16% increase in students living in HMOs between 2010/11 and 2016/16 in response to a lack of purpose-built accommodation, compared to an 8% increase nationally.

The significance of the conclusions of this note in comparison to the SHMA conclusions, the pipeline of student accommodation, and the resultant policy approach are discussed in section 4.43 (pages 138-141) of the Local Plan Background Paper (EV002).

Gypsy and Traveller provision

Q19. Has the methodology of the Gypsy and Traveller Accommodation Assessment been tested at any other examinations to date?

The methodology used by arc4 in the Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment (EV016) has been used by a number of different local authorities across the country. Recent examples where assessments using this methodology have been considered at examination are set out below.

South Worcestershire Development Plan (Adopted February 2016)

Para 140 of the Inspector's Report⁵ states that:

"Most aspects of the methodology employed in the 2014 GTAA are sound. However, two adjustments need to be made to make allowance which the assessment makes for pitch turnover. The first adjustment is necessary to account for the fact that propensity to move to another pitch within the area must logically add to need as well as to supply. The second is needed to reduce the unusually high, trend-based turnover rate in Malvern Hills district to a level that is more in line with the rest of the country and thus more likely to be sustained over the next five years."

Shropshire Site Allocations and Management of Development Plan (Adopted December 2015)

Paragraphs 71 to 79 of the Inspector's Report⁶ consider Gypsy and Traveller need. The inspector set out the findings of the GTAA prepared by arc4 and concluded in para 79:

"To conclude, the evidence confirms that it is not necessary for the SAMDev Plan to make further provision to meet the accommodation needs of the gypsy and traveller community and travelling showpeople".

⁵ http://www.swdevelopmentplan.org/wp-content/uploads/2016/02/SWDP_Inspectors_Report_Feb2016.pdf

⁶ <https://shropshire.gov.uk/media/8232/samdev-plan-inspectors-report.pdf>

Carlisle District Local Plan (Adopted November 2016)

The Inspector's Report⁷ concludes at paragraph 45 that:

"The assessment of the accommodation needs of gypsies and travellers is contained in the Cumbria Gypsy and Traveller Accommodation Assessment (November 2013). It is generally considered to be robust although an allowance for a 10% turnover rate on existing sites is considered by some to be rather high (the inspector then recommended that monitoring is put in place to further test this assumption)."

Bradford Core Strategy (Adopted July 2017)

Paragraph 114 of the Inspector's Report⁸ stated that:

"CBMDC commissioned a [GTAA] update for Bradford district, in order to update the pitch requirements and address concerns about the methodology raised by gypsy organisations, but this was not completed and approved until after the initial hearings of the examination had closed. The updated GTAA identifies a need for 82 pitches for gypsies and travellers (2014-19), along with pitches for the longer term (2019-30) and 7 transit pitches, and 68 plots for travelling showpeople (2014-19) with a longer term requirements for 13 plots... These amended requirements...were subject to consultation as part of the Main Modifications procedure, and no new issues were raised."

It should further be noted that arc4 have also carried out Gypsy and Traveller Accommodation Assessments for two other authorities within the local area using the same basic methodology, Wokingham Borough Council (May 2017), and Bracknell Forest Borough Council (October 2017). However, these have yet to be considered at examination.

Q20. Could the Council please confirm what options were explored for both permanent and transit Gypsy and Traveller sites within the Borough, and the reasons for discounting any sites?

Providing sites for gypsies and travellers has always been very difficult to achieve in Reading given its urban nature and tightly drawn boundaries. There are no existing authorised gypsy and traveller sites in the Borough that could be extended. There has also been only one application for gypsy and traveller pitches in Reading in recent years, for two pitches at Brybur Close, which was refused and is now subject to a planning permission for a new house.

Initially, before the Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment (EV016) was finalised, the following measures were undertaken to identify any potential sites:

- *January 2014 - the Council carried out a call for sites exercise, for all uses. No sites were nominated as having potential for gypsy and traveller use.*
- *September 2015 - the Council carried out a second call for sites exercise for all uses. Once again, no sites were nominated as having potential for gypsy and traveller use.*

⁷https://www.carlisle.gov.uk/Portals/24/Documents/Examination_Library/Inspectors%20Report/Final%20Inspectors%20Report%2025%2007%2016.pdf?timestamp=1531235713128

⁸<https://www.bradford.gov.uk/Documents/planningStrategy/08%20Inspectors%20Report//Bradford%20Core%20Strategy%20Inspectors%20Report%20FINAL.pdf>

- *January 2016 - a specific question in the Issues and Options report asked for sites for gypsy and traveller use to be put forward. No responses identified any sites.*
- *May 2017 - the Draft Local Plan at paragraph 4.4.87 once again stated that the Council was open to suggestions for sites for gypsies and travellers. Once again, none were suggested.*

Alongside the above, the Housing and Economic Land Availability Assessment (EV014, EV015) was a comprehensive study of the potential of land in the Borough for meeting development needs. No clear candidate sites for gypsy and traveller provision emerged.

Finalisation of the Accommodation Assessment led to further efforts to identify sites in September 2017. A comprehensive assessment of the Council's own land was carried out, to identify land above 0.15 ha not covered by permanent buildings or defined as protected open space or covered by statutory allotments. This resulted in 80 sites being identified for further consideration, and assessed against the following criteria:

- *Flood risk*
- *Highway access*
- *Access to facilities*
- *Effect on character*
- *Effect on amenity*
- *Trees and biodiversity*
- *Other suitability considerations*
- *Availability.*

All but one of those 80 Council-owned sites was rejected for one or more of the reasons above. The remaining site, at Cow Lane, was considered to have potential for transit provision.

At the same time, on 8th August 2017, the Council wrote to all landowners of sites identified for development in the draft Local Plan, other than high-density town centre sites, as a last check whether the site was likely to have availability for gypsy and traveller provision. No landowners suggested that their site would potentially be available.

The Cow Lane site, together with a description of the work undertaken to date in identifying sites for gypsies and travellers, was subject to consultation during September and October 2017. All of the above information, including information on why each of the 80 Council-owned sites was rejected, is set out in more detail in the Gypsy and Traveller Provision Background Document (EV019), which was made available as part of that consultation.

The most recent position is that a meeting of the Council's Policy Committee on 11th June 2018 considered the results of the consultation on gypsy and traveller provision that was carried out in September and October 2017 (EV017). The report to Committee⁹ included a summary of the results of consultation (a similar summary is included in the Submission documents as EV018), and this in particular included a significant number of objections to the proposed traveller transit site at Cow Lane. Many of the issues raised were considered capable of being

⁹ <http://www.reading.gov.uk/media/8894/item10-GypsiesandTravellers/pdf/item10-GypsiesandTravellers.pdf>

overcome, but the most serious concern is the impact on the Reading Festival, which uses the site for a number of functions during the time of the festival (which takes place in August). After discussions with Festival Republic, it is clear that there are no possible adequate alternative arrangements, and the use of this site as a transit site would prevent the operation of the Festival, which forms a vital part of Reading's economic and cultural life. For this reason, and due to the identification of this land as part of the preferred site for the secondary school (see answer to Q24), Committee agreed that this proposal should not be pursued. Use of the land as part of the secondary school would not have the same impacts on the Festival, as it is expected to mainly be hardstanding on which the uses could continue to operate, and the Festival takes place during school summer holidays.

This means that allocation WR4 for a potential traveller transit site at Cow Lane is no longer considered capable of delivery. The Council would therefore suggest that this allocation is removed from the Local Plan. The result would be that the Council no longer has a site to meet its identified transit needs. Unlike for permanent accommodation needs, there is no proposal to instead meet these needs in another authority, as doing so would mean that the police could not make use of the enhanced enforcement powers under Section 62 of the Criminal Justice and Public Order Act 1994. Policy Committee agreed that the Council will instead continue to look for opportunities to meet these transit needs within the Borough.

During the September consultation, a number of other sites were suggested for consideration as an alternative to Cow Lane¹⁰. Of those that were not already considered as part of the site selection process, none are considered suitable, for the reasons set out below and articulated in the June Policy Committee report.

- Site of Murdoch's Pub at the bottom on Langley Hill on the Bath Road In West Berkshire District, so would offer no benefits to Reading in terms of using enhanced enforcement powers.
- 20 Scours Lane/ Beneath the railway off Portman Road
These sites are largely within Flood Zone 3 and partly in the functional floodplain, and would not be suitable for caravans.
- Near the A33/M4 interchange
Not clear which site is referred to in the comment. Much of the area immediately around the junction is used for balancing ponds, and there is no prospect of allowing additional accesses that would interfere with the operation of the junction. There is a part of a field within Reading Borough to the south west of the junction that the Local Plan has earmarked to potentially be part of any Grazeley proposal (SR4f). However, there is no road access to this within Reading Borough, and any development here would require a larger development with land in Wokingham to come forward to realise this.
- Rear of 107-109 Castle Hill
This is a very small site which, at 0.08 ha is well below the 0.15ha needed.

¹⁰ It should be noted that they were suggested by members of the public or businesses close to Cow Lane rather than nominated by landowners.

- Site of the old Civic Centre, to the rear of the Police Station
The Council is actively working with development partners to bring this site forward for a major mixed use development (site CR12e in Local Plan).

The Council's position is therefore that, despite substantial efforts to consider all possible sites, it is not possible to meet the identified needs for gypsies and travellers within Reading Borough. In recognition of this issue, in February 2018 the Council made a duty to co-operate request to the 8 closest local planning authorities to consider accommodating some or all of Reading's unmet needs. Although authorities generally agreed to keep the matter of provision for gypsies and travellers under review, no local authority has indicated a willingness to contribute to these unmet needs. However, the Council considers that its assessment of capacity is robust, and that, regardless of the lack of agreement, Reading will not be able to meet its needs and this will need to be considered through other authorities' Local Plans. More detail on this request, and other relevant matters, is set out in the Duty to Co-operate Statement (EV001).

Transport

Q21. Policy TR2 - the policy refers to safeguarding land for high quality bus routes what land would this be?

There is no land that has been identified as needing to be safeguarded for high-quality bus services. The reference in TR2 is to giving priority to the listed major transport projects, and safeguarding land where relevant. In the case of high-quality bus services, safeguarding land is not specifically relevant.

There is some crossover with the Mass Rapid Transit proposals, which is a bus-based public transport proposal. There are areas of land required to be safeguarded for this proposal, particularly the south and east MRT routes, and these are shown on the Proposals Map and/or Figure 4.8.

Retail

Q22. Paragraph 4.6.6 - what is the previous national guidance referred to, and why is it relevant to Policy RL1?

The previous guidance referred to is Planning Policy Statement 6: Planning for Town Centres, published in 2005 and replaced by PPS4 in 2009 and then by the NPPF in 2012. Neither of those replacement documents articulated the need for a diversity of uses in town centres as clearly as PPS6. Paragraph 2.22 of that document stated that:

"A diversity of uses in centres makes an important contribution to their vitality and viability. Different but complementary uses, during the day and in the evening, can reinforce each other, making town centres more attractive to local residents, shoppers and visitors. Local planning authorities should encourage diversification of uses in the town centre as a whole, and ensure that tourism, leisure and cultural activities, which appeal to a wide range of age and social groups, are dispersed throughout the centre."

The reference in 4.6.6 therefore describes how the network and hierarchy evolved within the Core Strategy and relevant documents. However, this is not essential

to an understanding of the policy, and the reference could potentially be removed or amended.

Q23. Policy RL6 - what is the latest position on applications for public houses within the Borough to become Assets of Community Value?

The following public houses in Reading are listed as Assets of Community Value:

<i>Asset</i>	<i>Date of decision to list</i>	<i>Date of expiry of listing</i>
<i>Foresters Arms Public House, Brunswick Street, Reading RG1 6NY</i>	<i>19 October 2013</i>	<i>18 October 2018</i>
<i>The Three Tuns Public House, 191 Wokingham Road, Reading RG3 1LT</i>	<i>7 November 2014</i>	<i>6 November 2019</i>
<i>Jolly Anglers Public House, Kennet Side, Reading RG1 3EA</i>	<i>17 February 2015</i>	<i>16 February 2020</i>
<i>Red Cow Public House, 56 Star Road, Caversham, Reading RG4 5BE</i>	<i>8 September 2015</i>	<i>7 September 2020</i>
<i>The Grosvenor Public House, 109 Kidmore Road, Caversham, Reading RG4 7NH</i>	<i>16 October 2015</i>	<i>15 October 2020</i>

The listing of the following public house recently expired:

<i>Asset</i>	<i>Date of decision to list</i>	<i>Date of expiry of listing</i>
<i>The Retreat, 8 St John's Street, Reading RG1 4EH</i>	<i>26 March 2013</i>	<i>25 March 2018</i>

The following public houses were subject to unsuccessful nominations:

<i>Public House</i>	<i>Date of expression of interest</i>	<i>Date of decision not to list</i>
<i>The Ale House Public House, 2 Broad Street Reading RG1 2BH</i>	<i>11 July 2014</i>	<i>4 September 2014</i>
<i>The Wynford Arms Public House, 110 Kings Road, Reading RG1 3BY</i>	<i>25 May 2016</i>	<i>27 July 2016</i>

There are no pending applications for public houses to be designated as an Asset of Community Value at the time of writing.

Other uses

Q24. Paragraph 4.7.6 - what progress has been made on identifying a potential site for a new 6 form entry secondary school, and what are the potential implications for the LP if a site is not found?

On 11th June 2018, the Council's Policy Committee received a report on planning for secondary school places. This contains details on future secondary education needs and notes that, by 2025-26, the Borough is expected to be around 1,000 places short in terms of secondary school provision without intervention. The report notes that, in addition to additional forms of entry within existing schools, there is a requirement for a new secondary school to meet needs arising. This has also been highlighted in the Local Plan (see paragraph 4.7.6 and Figure 10.2).

As recommended in the report, Committee resolved that the preferred site for a new 6-form entry secondary school to meet needs arising should be at Richfield Avenue. The report notes that there remain potential planning policy issues with the preferred site, including the loss of open space. The main part of the site constitutes a former golf driving range, now out of use, but the site also incorporates the land identified in the Local Plan for a potential traveller transit site (WR4). See answer to Q20 for the implications for provision for gypsies and travellers.

The report to Policy Committee identified the following timelines in progressing a proposal for a school. These timelines would clearly be dependent on a planning application being considered acceptable.

- *ESFA feasibility study completed (August 2018)*
- *Heads of terms agreed (October 2018)*
- *Free School sponsor appointed (October 2018)*
- *ESFA contractors bidders day (October / November 2018)*
- *Appoint Contractor (January 2019)*
- *Planning application (April 2019)*
- *Contractor Award (October 2019)*
- *Construction start on site (November 2019)*
- *School Opens (September 2021)*

The potential implications if a site is not found is that there would be a lack of secondary school places within Reading to meet identified needs. At the moment, there are significant flows of pupils out of Reading to secondary schools in West Berkshire, Wokingham and South Oxfordshire, and this would place further pressure in schools in Reading and adjoining authorities. One possibility is seeking education provision as part of a mix on the major town centre sites, and the three town centre Major Opportunity Area policies (CR11, CR12 and CR13) refer to education provision as a potential part of the development. However, it should be recognised that a new school is only part of the solution, and additional forms of entry within existing secondary schools forms part of the Council's approach.

Q25. Policy OU2 Figure 4.9 is there any planned development in the Middle and Outer Zones? If so, what are the implications for the LP?

The following Local Plan allocated sites are within the Middle Consultation Zone for AWE Burghfield:

- *SR1a: Former Landfill, Island Road (small proportion of site within zone) - industrial and warehouse uses;*
- *SR4e: Part of Former Berkshire Brewery site - office, industrial and warehouse uses with potential for other commercial use;*
- *SR4f: Land south west of Junction 11 of the M4 - uses associated with any major development around Grazeley.*
- *Total - 106,000 - 129,000 sq m of industrial and warehouse space on sites partly or fully within Middle Consultation Zone.*

In addition to the above, the following Local Plan allocated sites are within the Outer Consultation Zone:

- *SR1b: North of Island Road - industrial and warehouse uses;*
- *SR1c: Island Road A33 frontage - commercial uses, such as industrial and warehouse and offices;*

- SR2: Land north of Manor Farm Road - redevelopment for mainly residential (680 - 1,020 dwellings) and district centre extension
- SR3: South of Elgar Road - redevelopment for residential (330-500 dwellings)
- SR4c: 169-173 Basingstoke Road - residential (50-80 dwellings)
- SR4d: 16-18 Bennet Road - industrial and warehouse uses
- WR3n: Amethyst Lane - residential (32-48 dwellings)
- WR3o: The Meadway Centre - new district centre including retail and leisure and possibility of inclusion of residential
- WR3p: Alice Burrows Home, Dwyer Road - residential or residential care (18-27 dwellings or residential care equivalent)
- Total - 1,110 - 1,675 dwellings, 36,600 - 43,700 sq m of industrial and warehouse space and 3,700 - 4,600 sq m of retail and leisure space on sites within Outer Consultation Zone.

The Inner Consultation Zone (which does not include any land in Reading), extending up to 1.5 km from the facility, was also known as the Detailed Emergency Planning Zone (DEPZ). The relevance of the DEPZ is to identify the area for which the responsible local authority, supported by other responding agencies are required to plan in more detail. Planning is required in order to protect the public in the event of a radiation emergency which has an impact outside of the nuclear site boundary.

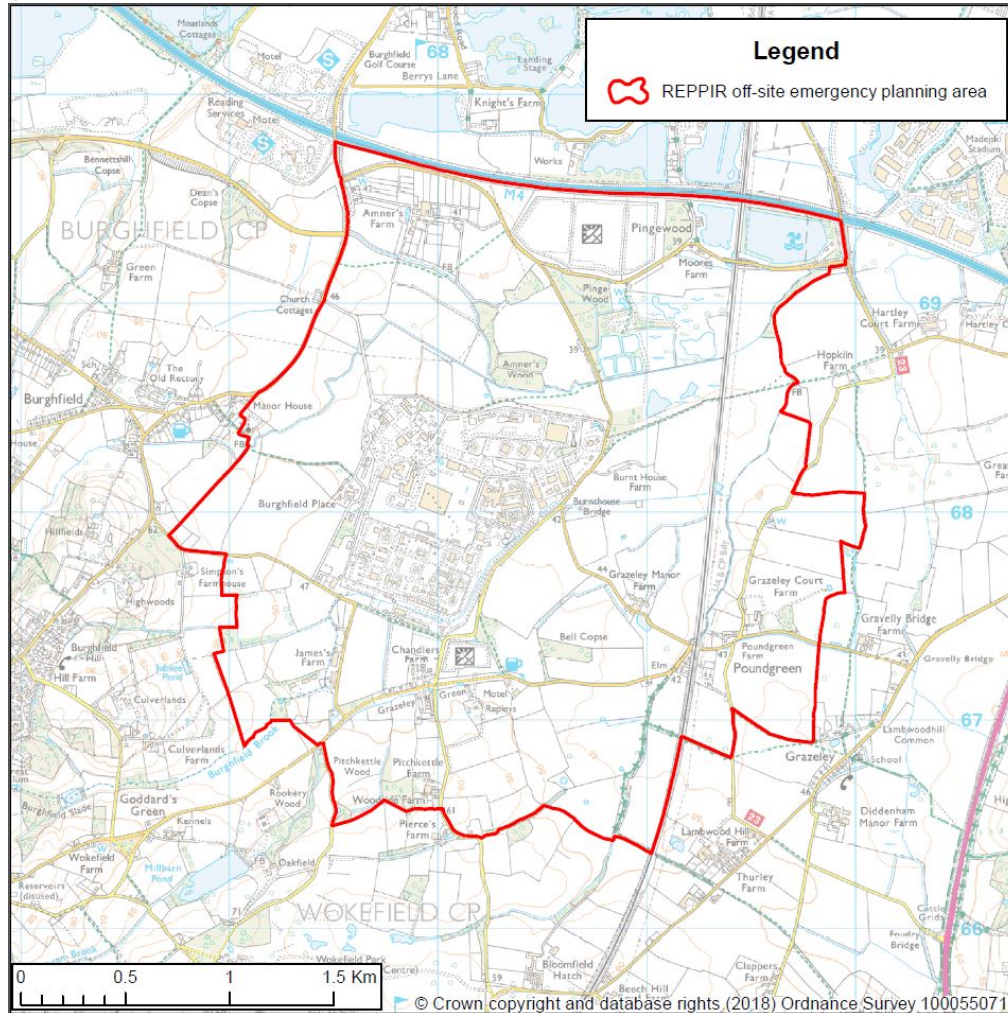
The Office for Nuclear Regulation (ONR) provides advice to the local planning authorities on any planning applications for developments around the AWE nuclear sites. The advice provided seeks to limit the radiological consequences to members of the public in the event of a nuclear emergency. The Middle (1.5 - 3km) and Outer (3-5km) Consultation Zones were established to ensure that ONR would be consulted on any planning applications which have the potential to affect the viability, operability or extendibility of the off-site emergency plan. An example of development within an Outer Consultation Zone that would require consultation with ONR would be a planning application (or two or more adjacent applications) for 200 or more dwellings. No ceiling to the amount of development which could be accommodated within the zone was ever formally set out to the Council's knowledge. The ONR's view was that the onus would be on each local authority affected to ensure that their emergency planning arrangements were sufficient to accommodate new developments.

On 14th March 2018, the ONR re-assessed the approach to AWE Burghfield, and focussed on identifying a new DEPZ, to be based on physical features on the ground rather than concentric distances. This zone, shown in Figure 1, still does not cover any part of Reading Borough. Reference was not made to the Middle and Outer Zones. It is understood that, whilst these zones no longer have any formal status, they are still useful for consultation purposes.

Radiological risks from the AWE sites are qualitatively different from other major hazard sites (e.g. those holding quantities of hazardous chemicals or explosives). For chemical or explosive hazards, there is typically a maximum distance within which people would definitely be harmed in the event of an accident, beyond which people would not be harmed. For radiological releases, exposure to ionising radiation decreases with distance from the point of release (and therefore the chance that an individual may be harmed by such an exposure decreases), but there is no fixed distance beyond which it can be guaranteed that no person might experience harm (although the probability of that harm being realised at greater

distances will be very small). This difference results in the application of consultation zones around nuclear sites that are much larger than those around other major hazard sites.

Figure 1: AWE Burghfield Emergency Planning Area as of 14 March 2018 (Source:



It is not considered that inclusion within the middle and outer consultation zones has implications for the development proposed in the Local Plan. The Council has consulted ONR on every stage of the Local Plan (and indeed on the Sites and Detailed Policies Document from which allocations SR2 and WR3p were carried forward), and not received any representations. Officers from the four authorities around the AWE sites (which also includes West Berkshire, Wokingham and Basingstoke and Deane) have met regularly with ONR over the years, and the scale of development in Reading was not considered a particular concern. Indeed, as far as officers are aware, the ONR has also not objected to any planning applications in Reading within recent years, seeing this instead as a matter for local emergency planning.

Central Reading

Q26. What is meant by the '18 hour welcome' and is it defined anywhere?

The term '18-hour welcome' originated in the City Centre Strategy 2010, produced by Reading City Centre Management in 2005. That document stated that, as part of the Action Plan:

"Reading City Centre will offer an 18-hour welcome and develop a reputation for excellence in cleanliness, maintenance and security"

That document did not specifically define the 18-hour welcome, but what was meant was that central Reading would continue to cater to a strong and diverse evening economy, but that referring to a 24-hour economy would give the wrong impression, particularly with the increase in residential in the core of the centre. Although not specifically defined, it would approximate to the period between 7-8 AM and 1-2 AM.

The City Centre Strategy is no longer current, and has not been replaced, but it informed the Reading Central Area Action Plan, and the reference has been carried forward to the Local Plan as it still best represents the most appropriate approach for central Reading.

If it is considered necessary, the 18-hour welcome could be included in the Glossary, although it is not intended to relate to a very specific time period. An entry could be as follows:

"A welcome provided by activity for an approximately 18 hour period of the day in the centre, which would exclude the early hours of the morning."

Q27. Paragraph 5.4.36 refers to regional policy - what is this?

This is included in error, and the Council considers that the reference should be deleted.

Caversham and Emmer Green

Q28. Policy CA1a the first sentence refers to national policy - what particular national policy is being referred to?

This is a particular reference to national policy in the NPPF on loss of sports and recreational buildings and land, in particular paragraph 74. It was included in response to a representation by the owners of the site, the University of Reading, at Pre-Submission stage (although it was not the wording suggested by the University), in recognition of paragraph 74 which allows for loss where the listed criteria are fulfilled. It was considered preferable to refer to the national policy on loss of such facilities rather than either repeat it or include specific cross-references to parts of the NPPF which may be subject to change.

The terminology used is consistent with the wording of a modification suggested by the Inspector for the Sites and Detailed Policies Document in his 2012 Inspector's Report, who recommended adding "subject to it being demonstrated that the loss of the open space is justified under relevant national and local policy" to policy SA5 of that document where development of a playing field was proposed.

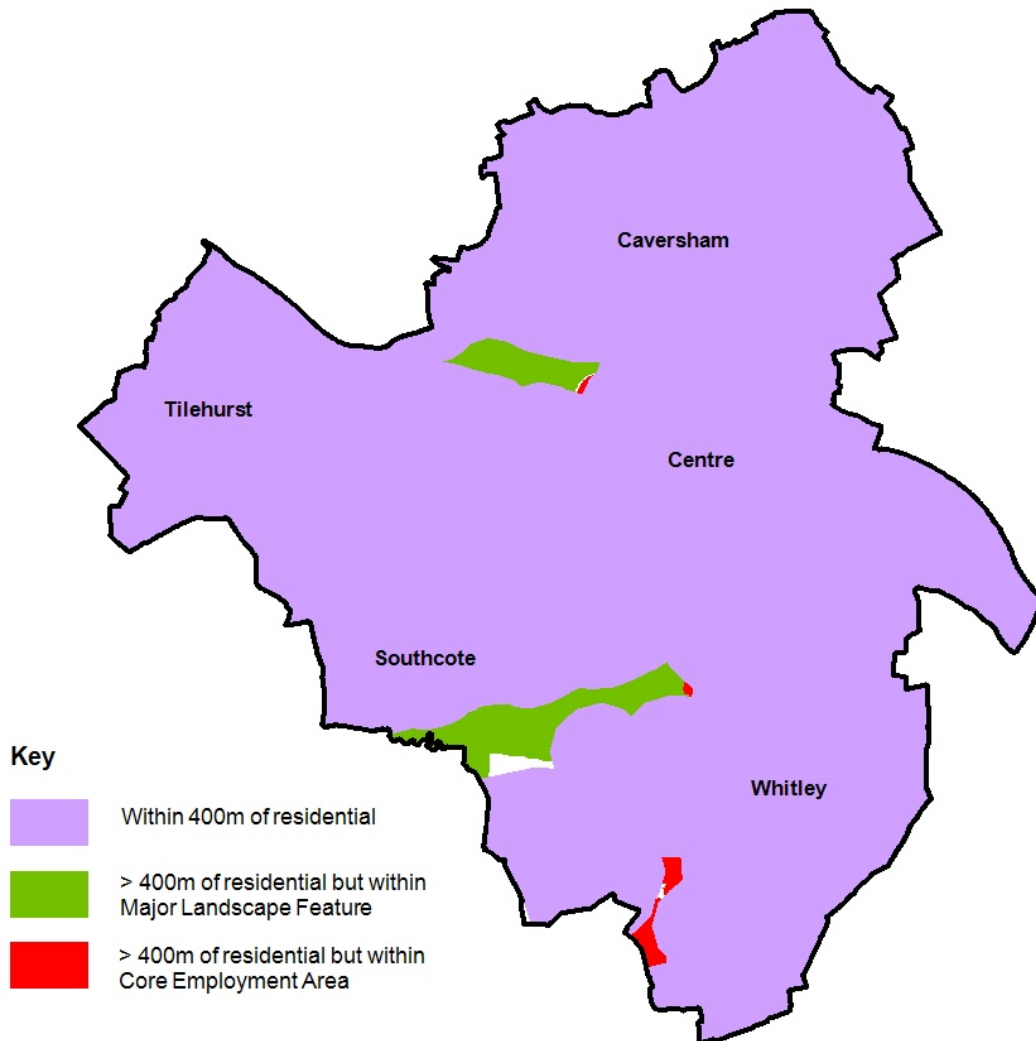
Wind Turbine Development

Q29. In light of this WMS, can the LP be regarded as being effective and consistent with national policy in so far as it relates to wind energy related developments? If not, what modifications would be necessary to the Local Plan?

The Written Ministerial Statement of 18th June 2015 requires that planning applications for onshore wind development must be in an area identified as suitable for wind energy development in either local plans or neighbourhood plans. In addition, it must be demonstrated following consultation that the proposal reflects the planning concerns of local communities and therefore has their backing.

No areas suitable for wind energy development have been identified in the Reading Borough Local Plan because it is not considered that any areas of the Borough would be suitable. Figure 2 shows that virtually all of the Borough falls within one of three constraints that would prevent wind energy development.

Figure 2: Constraints on wind energy development in Reading



According to the Centre for Sustainable Energy guidance on onshore wind development, Local Planning Authorities should exclude all sites in residential areas plus a buffer of 8 times the rotor diameter (for example, a large turbine

with 50-metre blades would require a buffer of 400 metres)¹¹ in order to prevent shading and noise impacts. As Reading is an urban authority, the vast majority of which is close to residential properties, this excludes virtually all of the Borough. Secondly, it is considered that sites must avoid impacts on any designated major landscape features under policy EN13. Finally, existing core employment areas are valuable existing developed areas and could not be developed for wind energy. In addition, there will be a number of other constraints that are not taken into account above, such as flood risk, heritage assets or transport access.

Considering these constraints, it is not possible to identify areas suitable for wind energy in the Local Plan. The Local Plan is therefore effective and consistent with national policy in this regard.

Other Matters

Q30. Are the policies worded to ensure that they will be effective and that they provide a clear indication of how a decision maker should react to a development proposal? For example phrases such as 'Take account of' (for example Policies ER1d and ER1c) and in Policy EM3 the criteria are questions, these are not requirements that must be satisfied. The Council may wish to consider if modifications are necessary.

In drafting the Local Plan, the Council has sought to include wording that gives a clear indication how a decision maker should react. This does differ from policy to policy. The Council has thought carefully about how these policies are worded.

In the case of EM3, there is a balanced judgement needed as to whether an area of employment land should be released for alternative uses, and the criteria set out are those that need to be taken into account. There will be very few occasions where all, or none, of these criteria are satisfied, and it does not therefore make sense to word the policy to indicate this. This policy uses the wording taken from policy CS11 of the Core Strategy, and therefore similar wording has already been used for development management purposes for ten years without any issues arising about whether the policy is effective.

With reference to the site allocation policies, the wording 'take account of' is often used where there is considered to be potential for impacts but where further assessment at application stage may reveal that there are in fact no impacts. It therefore acts as a placeholder for both applicant and decision-maker to ensure that the issue is considered, and, if necessary, responded to. Once again, this wording is already used in development plans in Reading, in this case the Sites and Detailed Policies Document, and there is therefore some years of experience of applying the policies without the wording causing any issues.

¹¹ <https://www.cse.org.uk/downloads/reports-and-publications/community-energy/planning/neighbourhood-planning-wind-guidance.pdf>

Appendix 1: Other updates

There is one other matter on which updates since Submission of the Local Plan may be of value, which is on the Memorandum of Understanding on objectively assessed need, which is referred to in paragraph 2.3.7 of the Duty to Co-operate Statement (EV001), and a draft version of which is included as Appendix 4 of that Statement. The MoU was signed by four of the six Berkshire authorities, excluding the Royal Borough of Windsor and Maidenhead and Wokingham Borough Council. RBC has never considered this to be one of the most significant duty to co-operate measures for its Local Plan, but since this MoU was raised in duty to co-operate objections by Chiltern and South Bucks District Councils, it is worth providing an update.

Discussions around a new version of this MoU have continued since submission, and these have included discussions with Chiltern and South Bucks. This resulted in a new draft, which, at their request, featured an Appendix drafted by Chiltern and South Bucks, setting out their points of disagreement with the Berkshire authorities. The MoU has now been signed by five of the six Berkshire authorities. The exception is Wokingham Borough Council, which is still taking the MoU through member processes. It was decided to sign the MoU via an Individual Executive Member Decision on 12th July, and a final signature from Wokingham is awaited. It was agreed that Chiltern and South Bucks District Councils would not be signatories to the MoU.

The MoU as signed by five authorities is included overleaf.

Appendix 2: Statement of Common Ground with British Sign and Graphics Association

EXAMINATION INTO THE READING BOROUGH LOCAL PLAN

STATEMENT OF COMMON GROUND
between the BRITISH SIGN AND GRAPHICS ASSOCIATION and READING BOROUGH
COUNCIL


June 2018

This Statement of Common Ground between the British Sign and Graphics Association (BSGA) and Reading Borough Council (RBC) relates to policy OU4 (Advertisements) and related supporting text of the Reading Borough Local Plan. This policy and its supporting text were the only parts of the Local Plan on which the BSGA made comments at Pre-Submission Draft stage.

In response to these representations, RBC made minor changes to the Local Plan prior to its submission in March 2018. The full schedule of changes is set out in the Schedule of Minor Changes prior to Submission¹, and the relevant changes are 48, 49 and 50.

Both parties agree that the changes made largely resolve the concerns raised by the BSGA on the Local Plan and that the Local Plan is therefore 'sound'. The BSGA suggests an additional minor reference, that in paragraph 4.7.29, after "The most recent report (2015) sets the following levels", insert "(applicable to measurements at night)", which is a factual change from the Institute of Lighting Professionals 2015 report. RBC agrees that this change would help to improve clarity, and intends to include it as an additional modification to the Local Plan as part of the examination process.

Signed:


..... on behalf of the British Sign and Graphics
Association
(name, role) CHRIS THOMAS, AGENT FOR BSGA
29 May 2018

MARK WORRINGHAM on behalf of Reading Borough Council
(Mark Worringham, Planning Policy Team Leader)

¹ http://www.reading.gov.uk/media/8660/LP008-Schedule-of-Minor-Changes-prior-to-Submission/pdf/LP008_Schedule_of_Minor_Changes_prior_to_Submission.pdf

Appendix 3: E-mail communication with Natural England

From: [Baines, Chris \(NE\)](#)
To: [Worringham, Mark](#)
Cc: [Southworth, Isabel \(NE\)](#)
Subject: RE: Reading Borough Local Plan - comments by Natural England
Date: 11 June 2018 15:39:09

Hi Mark

My colleague is also of the opinion that we would not need to reiterate the points made in our response at examination. So I hope this response is sufficient regarding your original email?

Kind regards,

Chris

From: Worringham, Mark [mailto:Mark.Worringham@reading.gov.uk]
Sent: 11 June 2018 11:38
To: Baines, Chris (NE) <Chris.Baines@naturalengland.org.uk>
Cc: Southworth, Isabel (NE) <Isabel.Southworth@naturalengland.org.uk>
Subject: RE: Reading Borough Local Plan - comments by Natural England

Thanks Chris, that's helpful. I will await confirmation after discussion with your colleague.

Regards

Mark

Mark Worringham
Planning Policy Team Leader
Planning Section | Directorate of Environment and Neighbourhood Services

Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

0118 937 3337 (73337 internal extension)
Email: mark.worringham@reading.gov.uk

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From: Baines, Chris (NE) [mailto:Chris.Baines@naturalengland.org.uk]
Sent: 05 June 2018 17:15
To: Worringham, Mark
Cc: Southworth, Isabel (NE)
Subject: RE: Reading Borough Local Plan - comments by Natural England

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Dear Mark

Thanks for passing on those documents. Given that the Plan does not have the capacity to impact Nationally or Internationally designated sites of nature conservation, I do not think that we would consider it necessary to work towards an SoCG from our point of view. However I'm glad to see that a few changes have been made in order to account for our comments.

Having looked through your responses to our comments, I don't think there are any issues which present sufficient risk for us to be reiterating these points at examination.

I have passed this on to my colleague who now covers the Berkshire area for a second opinion, and would be happy to confirm our position on this when she gets back to me, if that would be helpful.

Kind regards,

Chris

From: Worringham, Mark [<mailto:Mark.Worringham@reading.gov.uk>]

Sent: 29 May 2018 09:19

To: Baines, Chris (NE) <Chris.Baines@naturalengland.org.uk>

Subject: Reading Borough Local Plan - comments by Natural England

Mr Baines

You provided comments on Reading Borough Council's Pre-Submission Draft Local Plan on behalf of Natural England, and we wrote to you to notify that the Local Plan was submitted to the Secretary of State on 29th March 2018. We are now working towards likely hearings beginning in September, and would ideally like to identify whether changes we have made to the Local Plan help to satisfy some or all of the comments, with a view to a possible Statement of Common Ground. Inspectors find this can be a useful approach and saves time for all parties at Examination.

In order to identify any possible areas of agreement, I attach a schedule setting out your comments together with Council responses, along with a schedule of changes that have been made in response to your comments. It would be really helpful if you could let me know please whether these go some way to resolving concerns.

If you do not feel that the changes are helpful or appropriate, there is no need to respond further, as the Inspector into the plan already has your Local Plan comments.

If you would like to discuss any of this further, please let me know.

Regards

Mark Worringham

Planning Policy Team Leader
Planning Section | Directorate of Environment and Neighbourhood Services

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0118 937 3337 (73337 internal extension)
Email: mark.worringham@reading.gov.uk

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Appendix 4: E-mail communication with Thames Water

From: [Carmelle Bell](#) on behalf of [Thames Water Planning Policy](#)
To: [Worringham, Mark](#)
Cc: [Thames Water Planning Policy](#)
Subject: RE: Reading Borough Local Plan - Examination
Date: 29 June 2018 10:28:31
Attachments: [image002.gif](#)
[image003.jpg](#)

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Mark,

On behalf of Thames Water I have reviewed the proposed changes and can confirm that they address the points we raised through our reps.

Kind Regards

Carmelle

Carmelle Bell BA (Hons), MSc, MRTPI
Senior Planner
Planning

Savills, Ground Floor, Hawker House, 5-6 Napier Court, Napier Road, Reading RG1 8BW



Tel :+44 (0) 1189 520 503
Mobile :+44 (0) 7807 999 429
Email :CTBell@savills.com
Website :www.savills.co.uk



Before printing, think about the environment

From: Worringham, Mark [<mailto:Mark.Worringham@reading.gov.uk>]
Sent: 28 June 2018 16:16
To: Thames Water Planning Policy <ThamesWaterPlanningPolicy@savills.com>
Subject: Reading Borough Local Plan - Examination

You provided comments on Reading Borough Council's Pre-Submission Draft Local Plan, and we wrote to you to notify that the Local Plan was submitted to the Secretary of State on 29th March 2018. We are now working towards an Examination including hearings beginning in September, and would ideally like to identify whether our responses to representations have helped to satisfy some or all of the comments. Inspectors find this can be a useful approach and saves time for all parties at Examination.

I attach a schedule setting out your representations together with Council responses. I also attach a list of any minor changes that have been made to the Local Plan in response to your representations. It would be really helpful if you could let me know please if these go some way to resolving any of your points.

Because the plan has been submitted, this is not an opportunity for further comment. If you do not feel that the changes are helpful or appropriate, there is no need to respond as the Inspector into the plan already has your Local Plan comments.

Please let me know if you have any further queries or would like to discuss further.

Regards,

Mark Worringham
Planning Policy Team Leader
Planning Section | Directorate of Environment and Neighbourhood Services

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**Appendix 5: Signed Memorandum of Understanding with South
Oxfordshire District Council**

Duty to Cooperate Memorandum of Understanding between South Oxfordshire District Council and Reading Borough Council

March 2018

1. Introduction

- 1.1. This Memorandum of Understanding (MoU) has been prepared by South Oxfordshire District Council (SODC) and Reading Borough Council (RBC) to assist the Inspector during the examination of the South Oxfordshire Local Plan 2033 and Reading Borough Local Plan 2013-2036.
- 1.2. In the light of the Duty to Cooperate, SODC and RBC have agreed this MoU to identify areas and topics of common strategic agreement.
- 1.3. This MoU identifies the current position between the authorities. This MoU will be updated as necessary and updates can be sought at the request of either of the signatory authorities.

2. Housing Market Areas and Functional Economic Market Areas

- 2.1. SODC lies within the Oxfordshire Housing Market Area, as identified in the 2014 Oxfordshire Strategic Housing Market Assessment (SHMA). The SHMA was jointly commissioned and accepted by all Oxfordshire authorities.
- 2.2. RBC lies within the Western Berkshire Housing Market Area, covering the local authorities of Bracknell Forest, Reading, West Berkshire and Wokingham, as identified in the 2016 Berkshire (with South Bucks) Strategic Housing Market Assessment. The SHMA was jointly commissioned and accepted by all Berkshire authorities.
- 2.3. It is agreed that South Oxfordshire District and Reading Borough lie in separate but adjoining Housing Market Areas and Functional Economic Market Areas.

3. Housing and Employment Needs

- 3.1. Policy STRAT2 of the Publication version of the South Oxfordshire Local Plan commits SODC to make provision for at least 17,050 new homes. This equates to 775 homes a year, which is South Oxfordshire's objectively assessed need. In addition Policy STRAT3 of the Publication version of the South Oxfordshire Local Plan commits SODC to meet some of Oxford City Council's unmet housing needs. This will be delivered within the District and SODC is not seeking any neighbouring authorities to accommodate any of its housing requirements.
- 3.2. The Employment Land Review 2015 and Employment Land Review Addendum 2017 assessed that between 33.2 and 35.9 hectares of employment land would be

needed within the Plan period. Policy STRAT 2 of the Publication version of the South Oxfordshire Local Plan commits SODC to make provision for at least 35.9 hectares of employment land. The Publication version of the South Oxfordshire Local Plan identifies locations for a total of 37.2 hectares of employment land to be provided across the district. Some of this will be provided through Neighbourhood Development Plans. SODC does not anticipate that there will be a need to seek to meet needs for employment land outside the District.

- 3.3 Policy H1 of the Reading Borough Pre-Submission Draft Local Plan makes provision for 15,433 homes in Reading between 2013 and 2036, which equates to 671 per annum. Reading's objectively assessed need, identified in the Berkshire (with South Bucks) Strategic Housing Market Assessment (2016) is 699 dwellings a year, a total of 16,077 between 2013 and 2036. The Local Plan therefore identifies a shortfall of 644 dwellings in total. This conclusion is based on a Housing and Economic Land Availability Assessment.
- 3.4. The local authorities that lie within the Western Berkshire Housing Market Area (Bracknell Forest Borough Council, Reading Borough Council, West Berkshire District Council and Wokingham Borough Council) have agreed in a signed Memorandum of Understanding that the full objectively assessed housing need for the Western Berkshire Housing Market Area should be met within the Housing Market Area as defined in the Strategic Housing Market Assessment (2016) and that there is no requirement for RBC to seek alternative locations outside the Western Berkshire Housing Market Area to accommodate its identified unmet need. The authorities will continue to work together to ensure that Local Plans in the area set out policies and proposals that collectively provide for the full housing needs of the area, including unmet need from Reading.
- 3.5. The Economic Development Needs Assessment for Central Berkshire (2016) identified a need for Reading to provide 52,775 sq m of office floorspace and 148,440 sq m of industrial and warehouse floorspace over the plan period. The Pre-Submission Draft Reading Local Plan (November 2017) identifies appropriate locations to address this need.
- 3.6. It is agreed that SODC will not be seeking RBC to meet any of its housing or employment needs within the emerging Local Plan.
- 3.7. It is agreed that RBC will not be seeking SODC to meet any of its housing or employment needs within the emerging Local Plan.
- 3.8. Whilst the two authorities fall within different and separate HMAs, it is recognised that any housing development delivered in South Oxfordshire close to its boundary with RBC will be likely to have cross-boundary infrastructure implications. While neither SODC nor RBC propose that development takes place in this location, SODC and RBC agree to discuss how cross-boundary issues can best be mitigated should such developments be approved and to constructively consider how the approved development meets identified needs.

4 Gypsies and Travellers

- 4.1 The South Oxfordshire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2017) identifies a need for 10 additional gypsy and traveller pitches and no future need for travelling showpeople plots up to 2033. SODC's Local Plan 2033 identifies locations for this provision.
- 4.2 The Reading Borough Gypsy and Traveller, Travelling Showperson and Houseboat Dweller Accommodation Assessment (2017) identifies a need for 10-17 permanent gypsy and traveller pitches and 5 transit pitches up to 2037. It also identified two additional plots for travelling showpeople up to 2037. RBC has recently consulted on a potential transit site at Cow Lane. However, after a comprehensive assessment of sites, no location(s) to meet permanent needs has been identified.
- 4.3 In their recent response to the Reading Borough Gypsy and Traveller, Travelling Showperson and Houseboat Dweller Accommodation Assessment (2017), SODC asked RBC to clarify that they have explored all options in terms of identifying appropriate sites or including gypsy and traveller provision within employment or mixed use allocations to be proposed in Reading's development plan and/or the development opportunity identified at Grazeley in the West of Berkshire Spatial Planning Framework (2016) and Draft Reading Local Plan (April 2017).
- 4.4 It is agreed that SODC will continue its dialogue with RBC in respect of any cross boundary strategic issues, whilst recognising that South Oxfordshire falls within a separate but adjacent housing market area.

5 Transport Infrastructure

- 5.1 SODC are working with RBC, Wokingham Borough Council, Oxfordshire County Council and the Local Enterprise Partnerships to examine transport modelling and options for a third crossing of the Thames.
- 5.2 The Draft Reading Local Plan (April 2017) identifies three corridors on which opportunities for park and ride will be sought that cross the boundary into South Oxfordshire. There is likely to be a reliance on sites in South Oxfordshire. No specific sites have been identified in the Local Plan. SODC do not object to the principle of park and ride on road corridors into Reading, but this will depend on the specific sites identified. Policy TRANS2 of the Publication version of the South Oxfordshire Local Plan provides general support for park and ride in the district.
- 5.3 Policy TRANS1 of the Publication version of the South Oxfordshire Local Plan commits SODC to work with Oxfordshire County Council and others to plan for transport improvements in the Reading area, including the proposal for a new River Thames crossing which provides demonstrable benefits for South Oxfordshire and which ensure that there are no adverse traffic and environmental impacts of those measures.

5.4 It is agreed that SODC will continue its dialogue with RBC in respect of strategic transport networks which affect both local authorities and to consult on policies and proposals that affect the strategic network or which have cross boundary impacts.

6 Other strategic matters

6.1 SODC and RBC agree to cooperate on matters concerning any other strategic issues which affect both local authorities and to consult on policies and proposals that have cross boundary impacts.

7 Conclusions

7.1 This Memorandum of Understanding provides a framework for joint working between SODC and RBC. It is not a legally binding document but a document through which authorities have agreed an approach to work together on shared planning principles to assist in the preparation of their respective Local Plans.

Signed by the following Council representatives



Holly Jones

Planning Policy Manager

For South Oxfordshire District Council

Date - 03 April 2018



Councillor Tony Page

**Deputy Leader and Lead Councillor
for Strategic Environment, Planning
and Transport**

For Reading Borough Council

Date – 20 March 2018