

# READING BOROUGH LOCAL PLAN CONSULTATION ON MAIN MODIFICATIONS JUNE 2019

The Reading Borough Local Plan was submitted to the Secretary of State on 28<sup>th</sup> March 2018. The public hearings for the Examination took place between 25<sup>th</sup> September and 5<sup>th</sup> October 2018.

The Inspector's view, as articulated through the hearings and in subsequent written advice, is that, in order for the Local Plan to be considered 'sound', a number of modifications needed to be made. These modifications need to go through community involvement, as well as through the Sustainability Appraisal process. Such modifications are known as 'main modifications'.

As a result of this, the Council has therefore written to the Inspector to request that the main modifications contained in this document are made to the Local Plan.

This document asks for your views on the main modifications identified by the Inspector, as well as on the Sustainability Appraisal of those modifications (which is a separate document, available on the Council's website<sup>1</sup>). Page and paragraph references in the table are to the Submission Local Plan, which is available on the Council's website<sup>2</sup>, or in Reading Borough libraries and the Civic Offices. Please note that, at this stage, we are not accepting comments on any parts of the Local Plan other than the main modifications. Your comments on the main modifications will be provided to the Inspector for her consideration. It would be helpful if you could please refer to the modification reference when commenting.

Please note that the Council has also produced a schedule of more minor changes which do not alter the policy approach, and which it intends to make to the final version of the Local Plan. These do not require additional consultation or sustainability appraisal, but they are available for information on the Council's website<sup>3</sup>.

Please send comments to the Planning Policy Team on:  
[planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)  
Civic Offices  
Bridge Street  
Reading  
RG1 2LU

Please ensure that all comments are received by 5pm on Wednesday 24<sup>th</sup> July 2019.

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<sup>1</sup> [http://www.reading.gov.uk/media/10226/EM002-Sustainability-appraisal-of-main-modifications-June-2019/pdf/EM002\\_Sustainability\\_Appraisal\\_of\\_Main\\_Modifications\\_June\\_2019.pdf](http://www.reading.gov.uk/media/10226/EM002-Sustainability-appraisal-of-main-modifications-June-2019/pdf/EM002_Sustainability_Appraisal_of_Main_Modifications_June_2019.pdf)

<sup>2</sup> [http://www.reading.gov.uk/media/8649/LP001-Submission-Draft-Local-Plan/pdf/LP001\\_Submission\\_Draft\\_Local\\_Plan.pdf](http://www.reading.gov.uk/media/8649/LP001-Submission-Draft-Local-Plan/pdf/LP001_Submission_Draft_Local_Plan.pdf)

<sup>3</sup> [http://www.reading.gov.uk/media/10225/EM003-List-of-Minor-Modifications-for-Adoption-Local-Plan-0619/pdf/EM003\\_List\\_of\\_Minor\\_Modifications\\_for\\_Adoption\\_Local\\_Plan\\_0619.pdf](http://www.reading.gov.uk/media/10225/EM003-List-of-Minor-Modifications-for-Adoption-Local-Plan-0619/pdf/EM003_List_of_Minor_Modifications_for_Adoption_Local_Plan_0619.pdf)

## Schedule of Main Modifications

The examples of modifications below are expressed either in the conventional form of ~~striketrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the Submission Local Plan, and do not take account of the deletion or addition of text.

*\*Changes marked with an asterisk were already made to the Local Plan at Submission stage, but have been identified by the Inspector as requiring consultation at Main Modifications stage.*

*\*\*Changes marked with two asterisks were only partly already made to the Local Plan at Submission stage, and also incorporate further changes*

Ref	Page	Policy/ Paragraph	Main Modification	Reason
MM1	21	CC1	<p><b><i>“CC1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT</i></b></p> <p><i>A positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework <u>(NPPF)</u>. Where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, <del>and to secure development that improves the economic, social and environmental conditions in the area.</del></i></p> <p><i>Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Planning applications that accord with the policies in the development plan (including, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Proposed development that conflicts with the development plan will be refused, unless other material considerations indicate otherwise.</i></p> <p><i>Where there are no policies relevant to the application or <del>relevant the</del> policies <u>which are most important to determining the application</u> are out of date at the</i></p>	Update to take account of 2018 National Planning Policy Framework as discussed in hearings on 26 <sup>th</sup> September

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			<p><i>time of making the decision then permission will be granted unless material considerations indicate otherwise - taking into account whether:</i></p> <ul style="list-style-type: none"> <li><i><u>The application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or</u></i></li> <li><i><u>Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.</u></i></li> <li><del><i><u>Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</u></i></del></li> <li><del><i><u>Specific policies in that Framework indicate that development should be restricted.</u></i></del></li> </ul>	
MM2	22	4.1.5	<p>“Expectations for performance of new-build homes in terms of emissions are set out in policy H5 on housing standards. An existing Sustainable Design and Construction Supplementary Planning Document is in place, and the general principles, where in compliance with the overall policy, will continue to apply. An updated version of the SPD will be <u>prepared-published in 2019</u> to supplement this policy <u>and will provide further detail on how developments will be expected to achieve the BREEAM ratings required by policy CC2.</u>”</p>	To provide further detail on the forthcoming Supplementary Planning Document, as discussed at hearings on 26 <sup>th</sup> September.
MM3	23	CC3 and 4.1.6	<p><i>“All developments will demonstrate how they have been designed to incorporate measures to adapt to climate change. The following measures shall be incorporated into development:</i></p> <ul style="list-style-type: none"> <li><i><u>New-Wherever possible, new</u> buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements;</i></li> <li><i>Proposals involving both new and existing buildings shall demonstrate how they have been designed to maximise resistance and resilience to climate change for example by including measures such as solar shading, thermal mass, heating and ventilation of the building and appropriately coloured materials in areas</i></li> </ul>	To ensure policy is sufficiently flexible and to refer to the SPD in the explanatory text of policy CC3 as discussed at the hearings on 26 <sup>th</sup> September.

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			<p><i>exposed to direct sunlight, green and brown roofs, green walls, etc;</i></p> <ul style="list-style-type: none"> <li><i>• Use of trees and other planting, where appropriate as part of a landscape scheme, to provide shading of amenity areas, buildings and streets and to help to connect habitat, designed with native plants that are carefully selected, managed and adaptable to meet the predicted changed climatic conditions; and</i></li> <li><i>• All development shall minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change</i></li> </ul> <p>4.1.6 Adaptation is about making sure future communities can live, work, rest and play in a comfortable and secure environment in the face of inevitable climate change. Taking action now to help successfully achieve adaptation measures would help to reduce vulnerability for people, businesses, services and infrastructure to climate change. Adaptation measures need to be built into all new developments to ensure the sustainable development of housing, businesses and the economy of Reading.  <a href="#">Applicants should refer to the forthcoming Sustainable Design and Construction SPD for further guidance.</a>”</p>	
MM4	24-25	CC4 and 4.1.12- 4.1.18	<p><i>“In meeting the sustainability requirements of this plan, developments of the sizes set out below shall demonstrate how consideration has been given to securing energy for the development from a decentralised energy source, <del>including CHP.</del></i></p> <p><i>Any development of more than 20 dwellings and/ or non-residential development of over 1,000 sq m shall consider the inclusion of <del>a CHP plant, or other form of</del> decentralised energy provision, within the site, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision.</i></p> <p><i>Where there is existing decentralised energy provision, <del>including a CHP plant or a district energy network</del> present within the vicinity of an application site, further developments of <del>over 10 dwellings</del> <u>or more</u> or non-residential development of 1,000 sq m <u>or more</u> will be expected to link into the existing decentralised energy network or demonstrate why this is not feasible.</i></p>	To address the following as discussed at hearings on 26 <sup>th</sup> September; to refer to decentralised energy sources generally in order to future-proof the policy and avoid giving undue preference to CHP; to clarify that there are many ways of fulfilling the requirements of CC4; to refer to the SPD in the explanatory text of policy CC4; and to emphasise the potential of ground and air source heat pumps.

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			<p>4.1.12 Decentralised energy is a term that covers a variety of technologies, including various renewable technologies, and more efficient energy generation such as Combined Heat and Power (CHP), which provides heating and electricity at the same time. This policy promotes the use of decentralised energy including CHP and district heating, which has particular applications to a dense urban area such as Reading. It provides an explanation of when CHP or district heating should be considered as an energy efficient design measure to achieve the most up to date requirements for residential development and BREEAM requirements for other types of development. <a href="#">More information on decentralised energy will be published in the forthcoming Sustainable Design and Construction SPD.</a></p> <p>4.1.13 Electricity production is currently dominated by a centralised electricity generating system. Centralised electricity generating stations waste around two thirds of the energy in the fuels they use through the production of waste heat in generation then in electricity transmission and distribution to end users. On average around 65% of the energy is lost before it even reaches consumers. If better use could be made of this waste heat, and transmission distances could be reduced, there would be major benefits in tackling climate change and improving security of supply. A decentralised energy system (which might include CHP) can help address these issues.</p> <p>4.1.14 In addition the opportunity to reduce carbon emissions associated with heating requirements can be realised through the use of low carbon fuels such as biomass in the form of woodchip or wood pellets. The use of these fuels is often impractical and uneconomic on an individual dwelling basis but can be feasible when a higher heat load can be supplied from a central heat source with heat distributed to individual users via a pipe network, often termed district or community heating.</p> <p>4.1.15 CHP plants, although often fuelled by fossil fuels, are much more efficient than large centralised power stations, because the heat is used either as process heat in industry or distributed around buildings via a district heating system. The availability of a local district energy network connected to the decentralised energy generation plant means the CHP plant can be integrated with other fuels/technologies such as biomass,</p>	

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			<p>geothermal energy, or solar collectors. Much lower levels of energy are lost in transmission compared to centralised generation because distances from the point of generation to the point of use are relatively very short. Given that CHP involves the simultaneous generation of usable heat and power (usually electricity) in a single process, the amount of heat that is wasted is reduced and the heat that would normally be wasted to the atmosphere, rivers or seas can be put to use. <a href="#">Air-source or ground-source heat pumps should be considered in the first instance, as these methods are less carbon intensive than CHP.</a></p> <p>4.1.16 By seeing the energy system as a whole and locating energy production close to where it is used, it is possible to use both the heat and electricity generated and provide a doubling in the efficiency of current electricity generation and use as delivered by the mix of centralised power stations.</p> <p>4.1.17 The NPPF actively promotes bringing forward decentralised energy, with an expectation that new development will comply with adopted Local Plan policies on local requirements for decentralised energy. The NPPF also refers to identifying opportunities for energy supply for development to be drawn from a decentralised, renewable or low carbon supply system and for co-locating potential heat customers and suppliers.</p> <p>4.1.18 Following the production of heat spot maps, a feasibility study of the Borough, carried out by Thames Valley Energy (TVE), has identified potential opportunities for decentralised energy provision including district heat energy provision and CHP plant, which consider both existing and likely new development in the Borough as currently allocated. <a href="#">Potential for district heat and energy provision is being explored in areas of the town centre but represents just one of many possible ways of fulfilling the requirements of policy CC4.</a></p>	
MM5	32	CC9 and 4.1.50	<p><b><i>“Proposals for development will not be permitted unless infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary by the development will be provided through direct provision or financial contributions at the appropriate time.</i>”</b></p>	To reflect most up-to-date case law, as agreed in Statement of Common Ground (EC042), and to remove reference to

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			<p><i>Employment development should provide mitigation measures in line with its impacts on <del>the demand for housing (including affordable housing)</del>, labour and skills and on the transport network.</i></p> <p><i>In determining appropriate provision or contribution, the highest priority will be given to the following:</i></p> <ul style="list-style-type: none"> <li><i>• Transport infrastructure, including major cross boundary or sub-regional infrastructure projects;</i></li> <li><i>• Open space, green infrastructure and other measures to improve or enhance biodiversity;</i></li> <li><i>• Education, including cross-boundary facilities;</i></li> <li><i>• Economic development services and infrastructure, including employment, skills and training development initiatives and childcare provision.</i></li> </ul> <p><i>Where relevant a high priority will also be given to the appropriate provision of the following:</i></p> <ul style="list-style-type: none"> <li><i>• Energy infrastructure, including decentralised energy projects;</i></li> <li><i>• Health provision; and</i></li> <li><i>• Police Service infrastructure.</i></li> </ul> <p><i>Other measures, as follows, should also be considered where a specific need is identified and justified:</i></p> <ul style="list-style-type: none"> <li><i>• Community facilities;</i></li> <li><i>• Leisure and cultural infrastructure;</i></li> <li><i>• Reading Central Area infrastructure and amenities, including public realm and street care enhancements;</i></li> <li><i>• Environmental improvements outside the Central Area, such as within local</i></li> </ul>	<p>affordable housing contributions as set out in the Inspector's Post-Hearing Advice.</p>

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			<p><i>centres, including off-site street tree and other tree planting;</i></p> <ul style="list-style-type: none"> <li>• <i>Measures to tackle poor air quality or for on-going air quality monitoring; and</i></li> <li>• <i>Flood mitigation and prevention measures.</i></li> </ul> <p><del>Developers are required to contribute towards the ongoing local authority costs of monitoring the implementation and payment of planning contributions.</del></p> <p>...</p> <p>4.1.50 The tight labour market of Reading and the wider Thames Valley area means that additional employment development could result in still greater pressures on housing in the Borough, more congestion and longer commuting distances. Pressure on housing can particularly affect those who cannot afford open market housing. One possible way to mitigate these impacts is through maximising the potential of the existing population to fill jobs, through improving skills, changing working practices or providing childcare facilities. <del>In addition, new employment development can contribute to the provision of affordable housing.</del> Therefore, such development should include mitigation commensurate with its impact on the demand for <del>housing</del>, labour and skills.”</p>	
MM6	37	EN1	<p><b><i>“Historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. This will include:</i></b></p> <ul style="list-style-type: none"> <li>• <i>Listed Buildings;</i></li> <li>• <i>Conservation Areas;</i></li> <li>• <i>Scheduled Monuments;</i></li> <li>• <i>Historic parks and gardens; and</i></li> <li>• <i>Other features with local or national significance, such as sites and features of archaeological importance, and assets on the Local List.</i></li> </ul> <p><b><i>All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to</i></b></p>	To respond to the information (EP033) provided by Historic England



Ref	Page	Policy/ Paragraph	Main Modification	Reason
			<p><i>avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits.</i></p> <p><u><i>Applications which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings.</i></u></p> <p><u><i>Applications which affect Historic Parks and Gardens will safeguard features which form an integral part of the special character or appearance of the park or garden. Development will not detract from the enjoyment, layout, design, character, appearance, features or setting of the park or garden, key views out from the park, or prejudice its future restoration.</i></u></p> <p><i>Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement.</i></p> <p><i>The Council will monitor buildings and other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk including consideration of appropriate development schemes that will ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers.</i></p> <p><i>Where there is evidence of deliberate neglect or of damage to a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision."</i></p>	
MM7*	39	EN2	<p><i>"Development proposals which will have an adverse effect on scheduled monuments and other nationally important archaeological remains and their settings will not be allowed <u>unless there is clear and convincing justification in the form of overriding public benefits.</u>"</i></p>	To respond to a comment by Historic England
MM8	44	4.2.25	<p><i>"The National Planning Policy Framework states that local communities, through local plans, are able to identify Local Green Space for specific protection which is of</i></p>	To clarify the difference between Local Green Space

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			particular importance to them. The aim of this policy is therefore to define the boundaries of Local Green Space, based on the criteria in the NPPF. Local Green Spaces can only be designated during local plan preparation or review and must be capable of enduring beyond the end of the plan period. <a href="#">The policy also defines Public Open Space, where the local policy position is the same, but which do not benefit from the additional protection afforded by the Local Green Space designation as they do not fulfil the relevant criteria.</a>	and Public Open Space as discussed at hearings on 27 <sup>th</sup> September
MM9*	51	EN12	<b><i>“a) The identified Green Network, the key elements of which are shown on the Proposals Map, shall be maintained, protected, consolidated, extended and enhanced. Permission will not be granted for development that <a href="#">negatively</a> affects the sites with identified interest or fragments the overall network.”</i></b>	To respond to a comment by SGN and Danescroft
MM10	54	4.2.65	“Reading is primarily an urban area, but it benefits from a number of natural features that have remained largely undeveloped. The urban context means that the preservation of these features as a backdrop is of particular importance. New development should seek to maintain and enhance the natural beauty and visual amenity of the identified major landscape features. The extent to which new development prevents or minimises the visual impact on major landscape features and other landscape values is largely dependent on the location, design and scale of proposals. Landscape and Visual Impact Assessment (LVIA) can provide a useful methodology for assessing landscape impact <a href="#">where the setting of an AONB would be affected</a> . It should be noted that this policy does not rule out development in or close to these areas, but seeks to ensure that development only takes place where it can preserve or enhance the character or appearance of the feature.”	To clarify that LVIA applies to AONBs only as discussed at hearings on 27 <sup>th</sup> September
MM11**	55	4.2.67- 4.2.68	“4.2.67 Trees, hedges and woodlands help define the landscape and character of the Borough and provide multiple benefits to the urban environment including maintaining and enhancing biodiversity, absorbing carbon and helping to adapt to climate change. Reading’s woodlands are a highly visible feature of the ridgelines and a strong feature in the landscape of the river valleys that shape the urban area. Trees are also an important component of the character of many parts of the Borough particularly its older developed areas and suburbs and especially in Conservation Areas. Many streets within Reading, including primary routes into town, are characterised by their tree-lined nature, which should be protected and enhanced. Whilst Reading has some important woodlands and areas with substantial numbers of trees, including two areas	To respond to a comment by BBOWT and to clarify when off-site planting may be appropriate.

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			<p>of Ancient Woodland, shown on the Proposals Map<sup>51</sup>, other areas lack tree cover. It is therefore vital to ensure that important trees and woodlands are protected and canopy cover extended in areas lacking cover, including in conjunction with new development. <a href="#">This will particularly be the case for irreplaceable Ancient Woodland and veteran trees.</a></p> <p>4.2.68 Trees can make a positive contribution towards reducing the effects of future climate change by dissipating the impact of heavy rainfall, reducing urban temperatures and providing shade and protection against the detrimental effects of sunlight. New development should seek to incorporate strategically sited trees that will provide shade and cooling to developments, particularly to street frontages, large hard landscaped areas and other areas of public realm. <a href="#">Off-site tree provision will be appropriate in some cases where it has been demonstrated that acceptable development cannot provide an appropriate level of mitigation planting (where trees are to be removed) and/or new planting within the site. This will be of particular importance where such sites are within or on priority tree planting areas/routes, as defined in the Tree Strategy.</a> There will be a need to use appropriate large canopy species that are adaptable to future predicted climatic conditions (native species if possible and where appropriate in order to deliver biodiversity benefits), particularly the higher temperatures and potential drought conditions predicted in summer. Tree stock should either be UK grown or sourced from a domestic nursery that retains its trees for a minimum of one year (a full growing season) within the UK before sale to ensure plant health and non-infection by foreign pests or disease.”</p>	
MM12	57-58	4.2.79- 4.2.82	<p>“4.2.79 The AQMA, shown on the Proposals Map highlights the main area of concern, and focus for this policy, however <del>it may be that in certain circumstances ensuring high levels of air quality is important for the whole of Reading, and</del> air quality may be a consideration outside the AQMA. Some schemes may potentially significantly impact air quality outside of the AQMA, or may have effects on the AQMA, for example through large-scale traffic generation.</p> <p>4.2.80 This policy aims to ensure that increased development within <del>the AQMA-Reading</del> does not lead to a net increase in emissions as well as ensuring any increased exposure within the poorest areas of air quality is accompanied by appropriate mitigation. Mitigation measures vary for each case, but can include simple measures designed into</p>	To make clarifications to highlight that air quality may be an issue both within and outside the AQMA and to make clearer on what basis an Air Quality Assessment will be required, as discussed at hearings on 27 <sup>th</sup> September.

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			<p>the scheme from the outset. The most likely mitigation through design involves setting residential units further back from busy roads, however, in some circumstances this could also include siting habitable rooms away from the façade fronting the pollution source, or, in the case of mixed use development, limiting the residential accommodation to higher floors. Other mitigation measures may also include travel plans, restrictions in car access or parking, planting, green walls or certain types of paving that absorb NO2. It does not mean that the development of sensitive uses <del>in the AQMA where they would be exposed to poor air quality</del> will necessarily be inappropriate.</p> <p>4.2.81 In some cases, an Air Quality Assessment (AQA) will be required with a planning application. The requirement for an assessment will depend entirely on the exact nature and location of the application. However, broadly speaking, developments will be likely to require an AQA if they are <u>major developments (10 dwellings or 1,000 sq m of floorspace or more)</u> located within <u>or accessed from</u> the AQMA and:</p> <ul style="list-style-type: none"> <li>• Would lead to a material increase in congestion or HGVs;</li> <li>• Would include significant amounts of car parking, for example 100 spaces, or would significantly increase current provision, for example by 25%;</li> <li>• Would emit air pollutants that would affect sensitive receptors, including areas of biodiversity importance such as priority habitats; or</li> </ul> <p><u>An AQA will also be likely to be required if a development of any scale <del>W</del>would locate new sensitive receptors, such as residential, in areas of particularly poor air quality, such as on the façade of a very busy road.</u></p> <p>4.2.82 The above criteria are meant as a guide only, and in reality there may be schemes which may meet one or more of the above but may not require an AQA. Conversely there may be schemes which do not meet the above but may require an assessment. <u>More detailed guidance about how to judge which developments might lead to a material increase in congestion or HGVs is included within Planning for Air Quality (EPUK and IAQM, 2017)<sup>55</sup>, although this may be subject to update within the plan period, which means that including that detail within the Local Plan is not appropriate.</u> It is strongly recommended that the Council's Environmental Protection Team is contacted if it is believed an assessment may be required, as they will be able to provide guidance as well as advice on the level of detail required within the</p>	

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			<p>assessment and providing monitoring data.”</p> <p><i>Add new footnote and renumber subsequent footnotes</i></p> <p>“<sup>55</sup> <a href="http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf">Land-Use Planning &amp; Development Control: Planning For Air Quality (Environmental Protection UK, Institute of Air Quality Management, 2017)</a>  <a href="http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf">http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf</a>”</p>	
MM13	63	EN17	<p><b>“Where noise generating equipment is proposed, the noise source <del>rating-specific</del> level (plant noise level) should be at least 10dBA below the existing background level as measured at the nearest noise sensitive receptor.”</b></p>	To correct an error - see Council Response to Issue 5 (EC007)
MM14	63	4.2.99	<p><i>Insert new paragraph and renumber subsequent paragraphs</i></p> <p><a href="#">“4.2.100 The SFRA also defines the extent of the functional floodplain within Reading. The 2017 SFRA, in describing how this has been approached, distinguishes between Flood Zone 3b ‘Functional Floodplain’ and Flood Zone 3b ‘Developed’. For clarity, the final definition on the flood zone maps F4 in the SFRA incorporates both of these categories, and it is this combined area which should be considered as Flood Zone 3b for the purposes of applying policy.”</a></p>	To ensure that the functional floodplain is correctly identified as discussed at hearings on 26 <sup>th</sup> September.
MM15	65-66	EM1, 4.3.6 and 4.3.7	<p><b>“Provision will be made for a net increase of 53,000-112,000 sq m of office floorspace and 148,000 sq m of industrial and/or warehouse space in Reading Borough for the period 2013 to 2036.</b></p> <p><i>Development that would exceed the levels of employment development set out in this policy, after existing permissions and allocations are accounted for, will need to either: (a) demonstrate that it will not result in additional need for local housing; or (b) mitigate its impacts on the need for local housing, <del>either which may be</del> through the provision of additional residential <del>or through contributions to affordable housing</del>.</i></p> <p><i>Proposals to provide a freight consolidation centre in a location with good access to the strategic highway network will be supported, subject to other policies in</i></p>	To remove reference to affordable housing contributions as set out in the Inspector’s Post-Hearing Advice (EI014).

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			<p><i>this plan.</i></p> <p>...</p> <p>4.3.6 There is currently a reasonable balance between the levels of employment planned for in Policy EM1 and the levels of housing set out in H1, as the relationship between employment and housing levels formed part of the evidence that supports these policies. That means that planning for levels of employment development over and above the upper amounts set out in this policy (when considered across the wider area) is likely to lead to an imbalance, and a greater need for housing within the area, as well as increasing the need to travel as workers commute from further afield.</p> <p>4.3.7 Therefore, where a development is proposed that would increase the level of employment development over the upper levels currently planned for, taking account of developments with planning permission and with outstanding allocations in this plan for employment use, the concerns about impacts on local housing need to be allayed. This will need to be achieved either by convincing justification as to why there will be no effects, or by adequately mitigating any effects, <u>for instance through additional residential</u>. The Annual Monitoring Report will inform whether these thresholds have been reached.”</p>	
MM16**	69	EM3 and 4.3.13	<p><b><i>“Within the Core Employment Areas, the overall level of employment land should be maintained. Proposals that would result in a loss of such land will not be permitted <u>other than in the exceptional circumstances described below</u>.</i></b></p> <p><b><i>Where, in exceptional circumstances, it can be demonstrated that a site in a Core Employment Area has no long-term (<del>i.e. over five years</del>) prospect of employment use, a related alternative commercial use <u>or a use which complements the employment use of the area</u> may be considered that would <u>not result in a significant reduction in jobs</u> <del>employ a similar number of people</del>.</i></b></p> <p><b><i>In other areas, the following criteria will be considered when assessing proposals which would result in a loss of employment land: -</i></b></p>	To ensure that the first and second paragraphs relate better to one another, and clarify the significance of five years, as discussed in hearings on 27 <sup>th</sup> September, and to respond to a comment by Thames Properties Ltd.

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			<p>(i) <i>Is access by a choice of means of transport, including access to the strategic road network, poor, and likely to remain poor?</i></p> <p>(ii) <i>Is the continued use of the site for employment, including the potential for redevelopment for employment uses, viable?</i></p> <p>(iii) <i>Is there a surplus of a similar size and type of accommodation in Reading?</i></p> <p>(iv) <i>Would continued employment use of the site detrimentally affect the amenity and character of a residential area?</i></p> <p>(v) <i>Is the need for alternative uses stronger than the need for the retention of employment land?</i></p> <p>(vi) <i>Would the proposal result in a piecemeal loss of employment land where there is potential for a more comprehensive scheme?</i></p> <p>4.3.12 There is a need for a certain degree of flexibility with existing employment land to allow an appropriate balance of uses to develop in the right locations. For this reason, it is not appropriate to simply apply a blanket protection to all existing employment areas. However, the Core Employment Areas have been identified as those areas of greatest economic significance, providing space that is required to ensure that the Reading economy is balanced and that those activities which support higher value businesses are in close proximity. As a result, an overall loss of employment land in these core areas would risk undermining the local economy, and should not be permitted. It is worth emphasising that this policy does not primarily aim to protect a specific number of jobs (which could be replaced in a non-employment use), but is rather about balance of the economy.</p> <p>4.3.13 The policy recognises that on some exceptional sites within the CEA, there may not be any long-term prospect of re-use or redevelopment for employment, and in these cases it is preferable for a site to be used for an alternative commercial use that complements the area than for it to be vacant in the long-term. <a href="#">Long term vacancy in this case can be taken to mean five years or more, as shorter time periods might be the result of short-term economic conditions</a>. For example, some of the older industrial areas contain large sites that were tailored to the needs of a specific type of operation</p>	

Ref	Page	Policy/ Paragraph	Main Modification	Reason
			that no longer exists or operates in the same way, making it unviable to re-let, either in its existing form or sub-divided, in the long-term. If there is also no long-term prospect of redevelopment of these sites for employment, alternative commercial uses under this policy may be considered.”	
MM17	72-73	H1	<p><b>“H1: PROVISION OF HOUSING</b></p> <p><i>Provision will be made for at least an additional <del>15,433</del> <b>15,847</b> homes (averaging <del>671</del> <b>689</b> homes per annum) in Reading Borough for the period 2013 to 2036.</i></p> <p><i>The Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that the shortfall of <del>644</del> <b>230</b> dwellings that cannot be provided within Reading will be met over the plan period.</i></p> <p>4.4.1 There is a pressing need for additional housing in Reading and the surrounding area. The six Berkshire authorities (Reading Borough Council, Bracknell Forest Borough Council, Slough Borough Council, West Berkshire District Council, the Royal Borough of Windsor and Maidenhead and Wokingham Borough Council) together with the Thames Valley Berkshire Local Enterprise Partnership co-operated on the production of a Berkshire (with South Bucks) Strategic Housing Market Assessment, which reported in February 2016<sup>70</sup>. This study identified the Housing Market Areas within which the Berkshire authorities should work, and set out levels of housing need between 2013 and 2036.</p> <p>4.4.2 The SHMA identifies Reading as being part of a Western Berkshire Housing Market Area, together with West Berkshire, Wokingham and Bracknell Forest. Within this area, an ‘objectively assessed need’ is identified for a total of 2,855 new homes every year up to 2036. Reading’s share of this need is 699 homes per year, or a total of 16,077 between 2013 and 2036. The expectation in the NPPF is that local planning authorities should meet their need unless they can demonstrate that doing so is not possible.</p>	<p>To take account of most up-to-date information on housing provision since the submission version in March 2018. This includes housing completions between 2017 and 2019, new permissions, changes to allocations (MM43 and MM47) and other up-to-date information on sites. Full explanation is in the Revised Local Plan Housing Trajectory April 2019 (EC044).</p>



Ref	Page	Policy/ Paragraph	Main Modification	Reason														
			<p>4.4.3 However, Reading is a very tightly defined urban area, and sites for new development are limited. The undeveloped land that does exist is mainly either in the functional floodplain or is important public open space. Provision of new housing therefore involves a heavy reliance on previously developed land, and the supply of such sites constrains the amount of housing that can be delivered in the Borough. The Council therefore needs to set targets for housing provision that are capable of being met.</p> <p>4.4.4 It is considered that of the 16,077 homes needed, <del>15,433</del>15,847 can be delivered in Reading Borough, which equates to <del>671</del>689 dwellings per annum. A Housing and Economic Land Availability Assessment<sup>71</sup> (<del>HELAA</del>) has demonstrated that this is the level of housing development that Reading can realistically accommodate in the plan period. <u>This uses a methodology that has been jointly agreed with four other Berkshire authorities, and examines each site with potential for ten dwellings or more, in terms of its development capacity, suitability, availability and achievability, as well as making an allowance for windfall development on sites of less than ten dwellings. The HELAA was carried out in November 2017, but the information on housing supply has been updated to 31<sup>st</sup> March 2019.</u> The expected provision breaks down as follows:</p> <table><tr><td><b>Total need for Reading Borough <u>2013-36</u></b></td><td><b>16,077 homes</b></td></tr><tr><td>Minus completed 2013-<del>2017</del>2019</td><td><del>2,514</del>4,202 homes</td></tr><tr><td>Minus permitted or resolution to grant (&gt;10 dwellings) at <del>November 2017</del>31<sup>st</sup> March 2019<sup>72</sup></td><td><del>4,153</del>4,696 homes</td></tr><tr><td>Minus allowance for small site (&lt;10 dwellings) windfalls at 127 per year-<del>2017</del>2019-2036</td><td><del>2,413</del>2,159 homes</td></tr><tr><td><b>Remainder not already identified</b></td><td><del>6,997</del><b>5,020</b> homes</td></tr><tr><td><b>Identified in Local Plan</b></td><td><del>6,349</del><b>4,790</b> homes</td></tr><tr><td><b>Shortfall to be accommodated elsewhere in HMA</b></td><td><del>644</del><b>230</b> homes</td></tr></table> <p>4.4.5 The Local Plan includes a Housing Trajectory at Appendix 1, which sets out how</p>	<b>Total need for Reading Borough <u>2013-36</u></b>	<b>16,077 homes</b>	Minus completed 2013- <del>2017</del> 2019	<del>2,514</del> 4,202 homes	Minus permitted or resolution to grant (>10 dwellings) at <del>November 2017</del> 31 <sup>st</sup> March 2019 <sup>72</sup>	<del>4,153</del> 4,696 homes	Minus allowance for small site (<10 dwellings) windfalls at 127 per year- <del>2017</del> 2019-2036	<del>2,413</del> 2,159 homes	<b>Remainder not already identified</b>	<del>6,997</del> <b>5,020</b> homes	<b>Identified in Local Plan</b>	<del>6,349</del> <b>4,790</b> homes	<b>Shortfall to be accommodated elsewhere in HMA</b>	<del>644</del> <b>230</b> homes	
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<b>Remainder not already identified</b>	<del>6,997</del> <b>5,020</b> homes																	
<b>Identified in Local Plan</b>	<del>6,349</del> <b>4,790</b> homes																	
<b>Shortfall to be accommodated elsewhere in HMA</b>	<del>644</del> <b>230</b> homes																	

Ref	Page	Policy/ Paragraph	Main Modification	Reason
	217-219	Figure 10.1	<p><a href="#">the housing requirement in policy H1 is expected to be met over the plan period, including forecast completions for each year. The Housing Trajectory will be kept up to date and a revised version published each December in the Council's Annual Monitoring Report (AMR). The AMR will also include an up-to-date assessment of the five-year housing land supply, a requirement of national policy. This will highlight any issues with the delivery of new homes, and whether there is any need to address issues through measures such as a plan review or through discussions with other authorities under the duty to co-operate.</a></p> <p>4.4.<sup>56</sup> Delivering the level of housing set out in policy H1 will mean that there is a shortfall of <del>644</del><sup>230</sup> dwellings when considered against Reading's need. This will need to be accommodated elsewhere within the Western Berkshire Housing Market Area. The other three authorities within the HMA recognise that there will be issues with Reading's ability to accommodate its need within its own boundaries, and this issue is set out within the West of Berkshire Spatial Planning Framework to which the four authorities have signed up<sup>73</sup>. There will be continuing dialogue on this matter between the affected authorities which will inform local plans. Where agreement is reached, it will be for individual authorities' Local Plans to specify where development will be located."</p> <p><i>Make the following alterations to the entries on Figure 10.1</i></p> <ul style="list-style-type: none"> <li>• CR11a - change from In Progress/Short/Medium to Short/Medium/Long (26-31)</li> <li>• CR11i - change from Medium/Long (26-31) to Medium/Long (26-31)/Long (31-36)</li> <li>• CR12b - change from In Progress/Short/Medium to Short/Medium/Long (26-31)</li> <li>• CR12c - change from Short/Medium to In Progress/Short/Medium/Long (26-31)</li> <li>• CR12d - change from Long (26-31) to Medium</li> <li>• CR14a - change from Short to Short/Medium</li> <li>• CR14k - change from Medium to In Progress</li> <li>• CR14l - change from Short to Medium</li> <li>• SR1b - change from Short to In Progress</li> <li>• WR1 - change from In Progress/Short to In Progress/Short/Medium</li> </ul>	

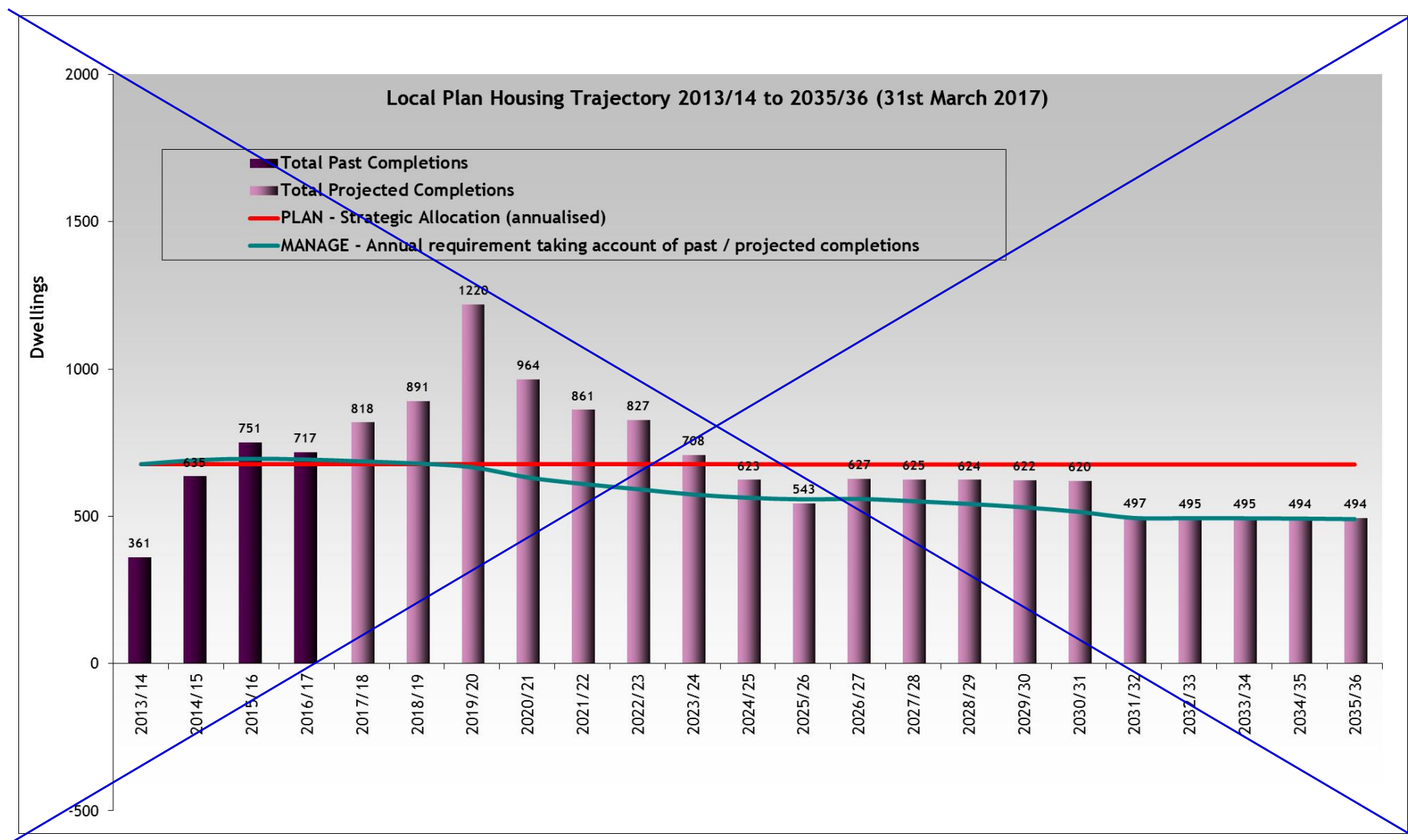
Ref	Page	Policy/ Paragraph	Main Modification	Reason							
	229	11.1.4 and Figure 11.1	<ul style="list-style-type: none"><li>• <i>WR3r - change from Short to Medium</i></li><li>• <i>CA1a - change from Short to Medium</i></li></ul> <p>“11.1.4 This Local Plan proposes to provide the vast majority, but not all, of Reading’s housing need. A shortfall of <a href="#">644-230</a> dwellings has been identified, to be provided elsewhere in the Western Berkshire Housing Market Area. The Council will play an active role in promoting the provision of these homes in other authorities, and will monitor progress in their provision. This will include the progress of other local authorities within the Housing Market Area in undertaking Local Plan reviews that help to meet the shortfall, and the progress in delivering homes against housing targets set out in Local Plans, including maintaining a five-year housing land supply.</p> <p>11.1.5 Where monitoring, <a href="#">particularly the updated housing trajectory that will be published in the Annual Monitoring Report</a>, demonstrates that there will not be sufficient progress on meeting this shortfall, the Council will consider the reasons for this, and will consider whether the extent of the lack of progress is sufficient to trigger a full or partial review of the Local Plan.”</p> <p><i>Make the following change to Figure 11.1</i></p> <table><tr><td>Amount of new housing delivered (net change)</td><td>H1</td><td><a href="#">674-689</a></td><td>Annual</td><td>RBC</td><td>Annual</td><td>AMR</td></tr></table>	Amount of new housing delivered (net change)	H1	<a href="#">674-689</a>	Annual	RBC	Annual	AMR	
Amount of new housing delivered (net change)	H1	<a href="#">674-689</a>	Annual	RBC	Annual	AMR					
	244-245	Appendix 1	<p><i>Make the changes to Appendix 1: Housing Trajectory shown overleaf.</i></p>								

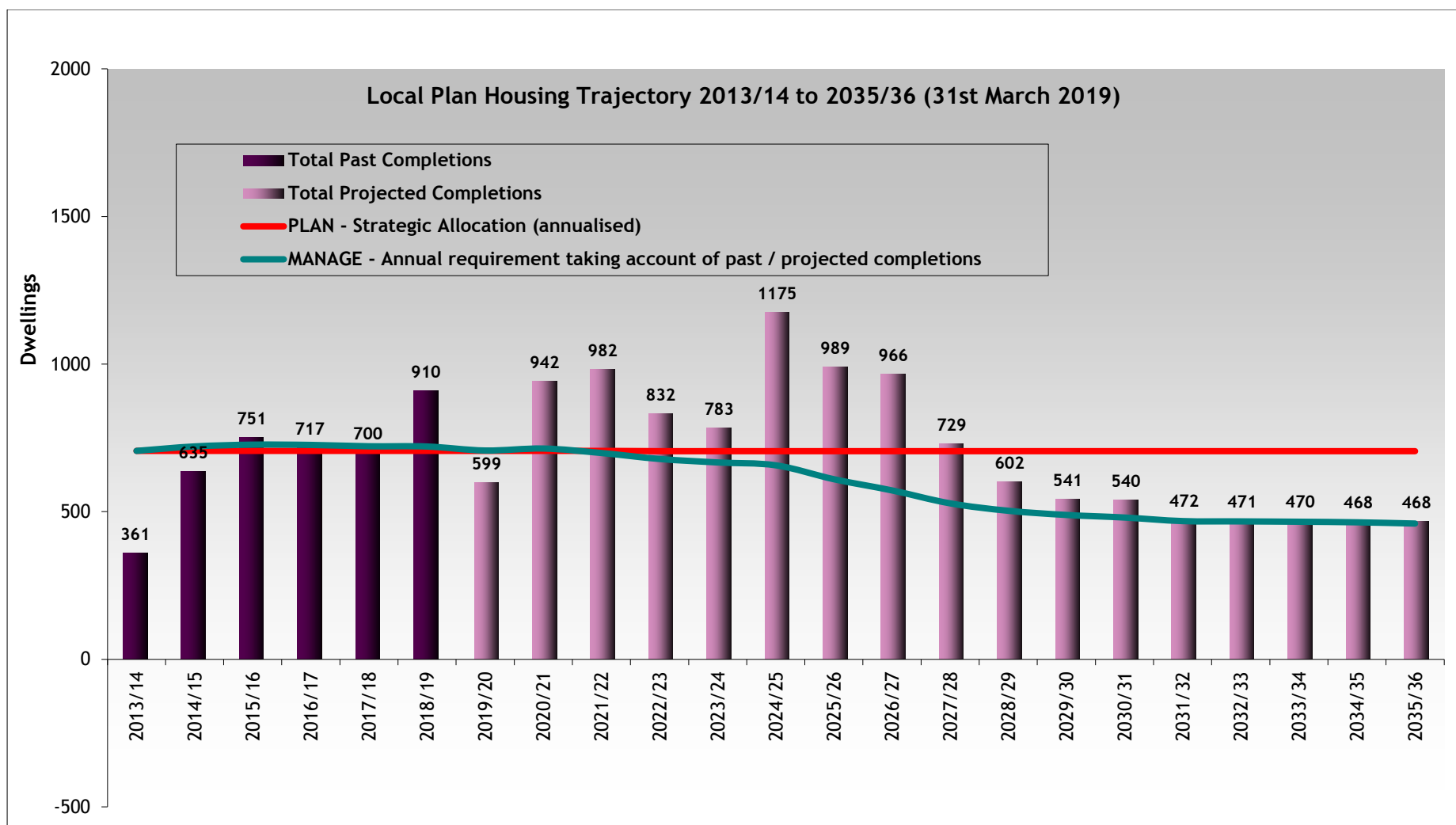
# Appendix 1: Housing Trajectory 2013/14 to 2035/36 as at 31st March ~~2017~~2019

	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	TOTAL	
Small Scale unidentified sites (<10 units)	123	129	80	103	<del>427</del> 141	<del>427</del> 124	127	127	127	127	127	127	127	127	127	127	127	127	127	127	127	127	127	<del>2848</del> 2859	
Permitted and under constr (10+), no lapse rate					<del>694</del>	<del>458</del>	<del>284</del> 465	<del>499</del> 565	<del>443</del> 125	<del>400</del> 101	<del>59</del> 100	0	0	0	0	0	0	0	0	0	0	0	0	<del>4904</del> 1356	
Permitted and not started (10+), incl lapse rate					<del>295</del>	<del>473</del>	<del>233</del> 7	<del>95</del> 370	<del>74</del> 697	<del>0</del> 489	<del>0</del> 448	<del>0</del> 505	<del>0</del> 332	<del>0</del> 270	<del>0</del> 145	<del>0</del> 59	0	0	0	0	0	0	0	<del>4467</del> 3322	
Permitted subject to S106 (10+), incl lapse rate					0	0	<del>37</del> 0	<del>28</del> -1	<del>0</del> 19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<del>65</del> 18	
<del>Permitted since 15/16</del> <sup>127</sup> (10+), 40% lapse rate					0	42	<del>280</del>	<del>349</del>	<del>90</del>	<del>90</del>	<del>90</del>	<del>90</del>	<del>46</del>	0	0	0	0	0	0	0	0	0	0	4047	
Sites in Local Plan, 10% or 20% lapse rate	0	0	0	0	0	0	<del>29</del> 0	<del>86</del> 0	<del>434</del> 14	<del>436</del> 115	<del>430</del> 108	<del>405</del> 543	<del>400</del> 530	<del>500</del> 569	<del>498</del> 458	<del>497</del> 417	<del>495</del> 414	<del>493</del> 413	<del>370</del> 345	<del>368</del> 344	<del>368</del> 343	<del>367</del> 341	<del>367</del> 341	<del>6593</del> 5295	
Other allowances					0	0	<del>60</del> 0	<del>58</del> -120	<del>2</del> 0	<del>2</del> 0	<del>2</del> 0	<del>2</del> 0	0	0	0	0	0	0	0	0	0	0	0	<del>109</del> -120	
Past completions (C3 housing)	361	635	751	717	<del>700</del>	<del>910</del>																		<del>2464</del> 4074	
Past completions (non-C3 residential) <sup>128-127</sup>	0	-41	-5	96	<del>36</del>	<del>42</del>																		<del>50</del> 128	
Total past completions (all)	361	594	746	813	<del>736</del>	<del>952</del>																		<del>2544</del> 4202	
Total projected completions					<del>848</del>	<del>894</del>	<del>1220</del> 599	<del>964</del> 942	<del>864</del> 982	<del>827</del> 832	<del>708</del> 783	<del>623</del> 1175	<del>543</del> 989	<del>627</del> 966	<del>625</del> 729	<del>624</del> 602	<del>622</del> 541	<del>620</del> 540	<del>497</del> 472	<del>495</del> 471	<del>495</del> 470	<del>494</del> 468	<del>494</del> 468	<del>13050</del> 12030	
Cumulative completions	361	955	1701	2514	<del>3332</del> 3250	<del>4223</del> 4202	<del>5443</del> 4801	<del>6407</del> 5743	<del>7268</del> 6724	<del>8095</del> 7556	<del>8803</del> 8339	<del>9426</del> 9514	<del>9970</del> 10504	<del>10597</del> 11470	<del>11222</del> 12200	<del>11846</del> 12802	<del>12468</del> 13343	<del>13088</del> 13883	<del>13585</del> 14356	<del>14080</del> 14826	<del>14575</del> 15296	<del>15069</del> 15764	<del>15564</del> 16232		
MONITORING AGAINST LOCAL PLAN TARGETS																									
PLAN - Housing (per annum)	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>699</del> 689	<del>15433</del> 15847	
PLAN - Non-C3 residential (resi equiv per annum) <sup>128-127</sup>	<del>6</del> 17	<del>6</del> 17	<del>6</del> 17	<del>6</del> 17	<del>6</del> 17	<del>6</del> 17	<del>6</del> 17	<del>6</del> 17	<del>6</del> 17	<del>6</del> 16	<del>6</del> 16	<del>6</del> 16	<del>5</del> 16	<del>5</del> 16	<del>5</del> 16	<del>5</del> 16	<del>5</del> 16	<del>5</del> 16	<del>5</del> 16	<del>5</del> 16	<del>5</del> 16	<del>5</del> 16	<del>5</del> 16	<del>427</del> 377	
PLAN - Total strategic allocation (annualised)	<del>677</del> 706	<del>677</del> 706	<del>677</del> 706	<del>677</del> 706	<del>677</del> 706	<del>677</del> 706	<del>677</del> 706	<del>677</del> 706	<del>677</del> 706	<del>677</del> 705	<del>677</del> 705	<del>677</del> 705	<del>676</del> 705	<del>676</del> 705	<del>676</del> 705	<del>676</del> 705	<del>676</del> 705	<del>676</del> 705	<del>676</del> 705	<del>676</del> 705	<del>676</del> 705	<del>676</del> 705	<del>676</del> 705	<del>15560</del> 16224	
MONITOR - No dwellings above or below cumulative allocation	<del>346</del> 345	<del>399</del> 457	<del>330</del> 417	<del>494</del> 310	<del>53</del> 280	<del>464</del> 34	<del>704</del> 141	<del>994</del> 95	<del>1475</del> 370	<del>1325</del> 497	<del>1356</del> 575	<del>1302</del> 1045	<del>1470</del> 1330	<del>1424</del> 1591	<del>1070</del> 1616	<del>1048</del> 1513	<del>964</del> 1349	<del>908</del> 1184	<del>729</del> 952	<del>548</del> 717	<del>367</del> 482	<del>485</del> 245	<del>4</del> 8		
MANAGE - Annual requirement taking account of past / projected completions	<del>677</del> 706	<del>694</del> 721	<del>695</del> 727	<del>693</del> 726	<del>687</del> 722	<del>679</del> 721	<del>667</del> 707	<del>632</del> 714	<del>610</del> 699	<del>592</del> 679	<del>574</del> 667	<del>563</del> 657	<del>558</del> 610	<del>559</del> 572	<del>551</del> 528	<del>542</del> 503	<del>531</del> 489	<del>515</del> 480	<del>494</del> 468	<del>494</del> 467	<del>493</del> 466	<del>492</del> 464	<del>491</del> 460		

<sup>127</sup> Or with resolution to grant subject to Section 106

<sup>128-127</sup> Expressed as a dwelling equivalent – see paragraph A1.3





MM18	74-75	H2, 4.4.6 and 4.4.14	<p><i>“The appropriate density of residential development will be informed by:</i></p> <ul style="list-style-type: none"> <li><i>the character and mix of uses of the area in which it is located, including the housing mix, and including consideration of any nearby heritage assets or important landscape or townscape areas;</i></li> <li><i>its current and future level of accessibility by walking, cycling and public transport;</i></li> <li><i>the need to achieve high quality design;</i></li> <li><i>the need to maximise the efficiency of land use; and</i></li> <li><i>the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.</i></li> </ul> <p><i>Indicative densities for different types of area are set out in figure 4.5, but the criteria above may indicate that a different density is appropriate. <u>Residential development capacity figures within the site allocation policies are often based on these densities, but the capacity of each site will likewise depend on various factors that need to be addressed at application stage, including detailed design and layout, and may differ from the range set out in the allocation.</u> Net densities of below 30 dwellings per hectare will not be acceptable.</i></p> <p><i>Wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6, in particular for family homes of three or more bedrooms. As a minimum, on new developments for 10 or more dwellings outside the central area and defined district and local centres, planning decisions will ensure that over 50% of dwellings will be of 3 bedrooms or more, having regard to all other material considerations.</i></p> <p><i>Residential proposals for ten houses or more (excluding houses that are to be provided as affordable homes) will <del>be expected to</del> consider making appropriate provision for plots as self- or custom-build <u>wherever viable and achievable</u>, based on the number of entries on the self-build register. The provision of self-build plots will be secured through legal agreement. Any plots that have not been sold after 12 months of appropriate marketing will revert to the developer to build.</i></p>	<p>To reflect the approach to indicative development capacities in site allocations, as specified in Inspector’s Post Hearing Advice.</p> <p>To include reference to viability for self-build and to improve clarity, as discussed in hearings on 28<sup>th</sup> September.</p>
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			<p>4.4.6 With the significant need for housing in Reading and surrounding areas, it is important that efficient use is made of the land that is available to boost the delivery of new homes. However, there are other considerations that need to be weighed against this, in particular the character of the surrounding areas and any other particular sensitivities. Each site has its own particular characteristics, and it is not appropriate to set down exact densities in this policy. <u>Likewise, dwelling figures in site allocations policies CR11-14, SR2-4, WR1-3, CA1-2 and ER1 should be treated as indicative, as the capacity of sites will ultimately depend on various factors that need to be addressed at application stage, including detailed design and layout. This may mean that dwelling totals for an allocated site fall outside the indicative range specified in the respective policy.</u></p> <p>...</p> <p>4.4.14 It is highly unlikely that the statutory duty to grant enough permissions will be met without some form of policy intervention. For this reason, it is considered appropriate that larger schemes of houses (not including flats and maisonettes <u>or non-C3 forms of housing such as student accommodation</u>) should consider making a contribution to meeting this need. The level of contribution would depend on the scale of the self-build need at the time. The following formula gives an indication of the appropriate level of provision, and is based on an estimate of the expected number of overall houses on sites to which the policy would apply. This is subject to a cap, so that no development would be expected to deliver more than 20% of houses as self-build."</p>	
MM19	76-78	H3, 4.4.20 and 4.4.23	<p><b><i>"Residential development will make appropriate contribution towards affordable housing to meet the needs of Reading</i></b></p> <ul style="list-style-type: none"> <li><i>on sites of 10 or more dwellings, 30% of the total dwellings will be in the form of affordable housing;</i></li> <li><i>on sites of 5 - 9 dwellings, <u>a financial contribution will be made that will enable the equivalent of 20% of the housing to be provided as affordable housing elsewhere in the Borough-20% provision of the total dwellings will be in the form of affordable housing;</u> and</i></li> <li><i>on sites of 1 - 4 dwellings, a financial contribution will be made that will enable the equivalent of 10% of the housing to be provided as affordable</i></li> </ul>	<p>Changes for the following reasons:</p> <ul style="list-style-type: none"> <li>To reflect practical difficulties in achieving on-site provision on sites of 5-9 dwellings, as initially discussed in hearings on 28<sup>th</sup> September, and considered within the Post-Hearing Advice (EI014), Additional</li> </ul>



			<p><i>housing elsewhere in the Borough.</i></p> <p><i>For sites of <u>10 or more</u> <del>than 4</del> dwellings, provision should be made on site in the first instance with a financial contribution being negotiated to make up the full requirement as appropriate.</i></p> <p>...</p> <p>4.4.20 Affordable housing contributions will be sought from residential-only developments and mixed-use developments. On-site provision (serviced land or completed units) of affordable housing will always be sought in the first instance <u>on sites of 10 dwellings or more</u>. Where there are exceptional reasons, the provision of surrogate sites (serviced land or completed units) or commuted sums that will enable the provision of a commensurate number and mix of affordable units, will be considered. Examples of exceptional circumstances may include sites where there are existing concentrations of particular types of affordable housing, where there are demonstrable benefits to be gained by providing the new units elsewhere (e.g. to create more socially-balanced communities), or where there is an opportunity to provide a particular type of much needed housing elsewhere (e.g. family housing). In the case of commuted sums, the Council will choose the registered provider to which to direct the funding or may use the contribution for Local Authority New Build. Under this policy it is accepted that affordable housing provision can take place off site or through contributions in the case of sites of less than <u>5-10</u> dwellings.</p> <p>4.4.21 Affordable housing contributions must be secured in perpetuity and thus be available to successive generations of households in recognised housing need. The most effective way of doing this is through the involvement of a registered provider (RP).</p> <p>4.4.22 The target set in the policy has been determined as the result of an assessment of the viability of development of sites of various sizes in the Borough in accordance with the requirements of the NPPF. This will be the expected level of affordable housing provision.</p> <p>4.4.23 However, the Council will be sensitive to exceptional costs of bringing a site to market such as for reasons of expensive reclamation, or infrastructure costs, or high</p>	<p>Justification on Policy H3 (EC043) and the Inspector's Note in Annex 1 of this document;</p> <ul style="list-style-type: none"> <li>• To avoid placing significant administrative burdens on developers of small sites, as considered within the Post-Hearing Advice (EI014), Additional Justification on Policy H3 (EC043) and the Inspector's Note in Annex 1 of this document;</li> <li>• To provide some interim guidance on tenure needs in advance of SPD, as discussed in hearings on 28th September.</li> </ul>
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			<p>existing use values. Where applicants can demonstrate, to the satisfaction of the Council, exceptional difficulties in bringing a site to market, the Council will be prepared to consider detailed information on the viability of a particular scheme and, where justified through an open book approach, to reduce the affordable housing requirement. <u>The information required will be proportionate to the scale of development, and, where a proposal is for less than 10 dwellings, will be more limited in scope and length. For sites of less than 10 dwellings, a brief schedule of the main elements of the viability calculations, supported by estate agent valuations, will generally suffice. The Affordable Housing SPD, to be revised later in 2019, will contain more detail on information to be submitted.</u> As development costs are usually reflected in the residual land value, the purchase price of a particular site will not, on its own, be a reason for reducing the affordable housing requirement. The Council will generally secure provision of affordable housing through a Section 106 agreement.</p> <p>4.4.24 The tenure, size and type of affordable housing provided as part of any scheme should respond to the identified need for affordable housing taking account of the most up-to-date information, including information in an Affordable Housing Supplementary Planning Document or other Supplementary Planning Document. The SPD may need to be updated to take account of any changes to the affordable housing definition, as well as other matters. Taking account of the 2016 SHMA, housing with two or more bedrooms that can house families is a priority. Paragraph 4.4.8 considers this in more depth. New development should therefore include a range and mix of tenures, sizes and types (e.g. house types, flats) of affordable housing (as appropriate depending on site size) to reflect local needs and to reflect the range and mix of house types in the scheme as a whole (i.e. the mix of dwelling sizes in the provision of affordable housing should reflect the mix proposed for the private housing).</p> <p><u>4.4.25 At the time of producing the Local Plan, the tenure split below reflects the most up to date position on needs within Reading. However, a revised Affordable Housing SPD, to be produced during 2019, will look at this issue in detail. The needs below are therefore subject to change within the SPD.</u></p> <ul style="list-style-type: none"> <li><u>Social rented or affordable rent housing of no more than target rent - 70% of affordable housing units; and</u></li> </ul> <p><u>Intermediate and/or shared ownership housing - 30%.”</u></p>	
MM20**	78	H4	<p><b><i>“Planning permission will be granted for developments of self-contained, private</i></b></p>	Changes for the following

			<p><i>rented homes which:</i></p> <ol style="list-style-type: none"> <li><i>1. Are secured in single ownership providing solely for the rental market for a minimum <del>30-20</del> year term with provision for clawback of affordable housing contributions should the covenant not be met; and</i></li> <li><i>2. Provide tenancies for private renters for a minimum of three years with a six month break clause in the tenant's favour and structured and limited in-tenancy rent increases agreed in advance; and</i></li> <li><i>3. Provide a high standard of professional on-site management and control of the accommodation; and</i></li> <li><i>4. <u>Provide a commitment to high-quality rental arrangements, through meeting <del>Meet</del> Reading Borough Council's <u>voluntary</u> Rent with Confidence Standards <u>or equivalent measures</u></u>; and</i></li> <li><i>5. Provide for a mix of unit sizes in accordance with Policy H2 <u>or CR6</u>; and</i></li> <li><i>6. Meet the standards of design set out in Policy H5; and</i></li> <li><i>7. Provide 30% on-site affordable housing, either in accordance with Policy H3 and any relevant Supplementary Planning Document; or in the form of Affordable Private Rent Housing as defined and set out in a relevant Supplementary Planning Document.</i></li> </ol> <p>...</p> <p>4.4.31 The Council will expect rental levels for the affordable housing or Affordable Private Rent housing to be related to Local Housing Allowance rate levels (including service charges) and be affordable for those identified as in need of affordable housing in the Borough. <u>An Affordable Housing SPD, to be produced in 2019, will set out further detail.</u> The Council will expect such housing to remain affordable in perpetuity.</p> <p>4.4.32 That policy acknowledges the need to tie such schemes to providing rental</p>	<p>reasons:</p> <ul style="list-style-type: none"> <li>• To reflect changes highlighted in the Post Hearing Advice for criteria 1 and 4 - the 20-year period reflects the covenant period agreed for Thames Quarter, the only build-to-rent scheme agreed in Reading so far, and is consistent with the proposed changes by Lochailort at Pre-Submission stage;</li> <li>• To incorporate flexibility in criterion 4, as discussed in hearings on 28<sup>th</sup> September</li> <li>• To respond to a comment by Ropemaker Properties on criterion 5;</li> <li>• To refer to where more detail on tenure will be available in paragraph 4.4.31 as discussed in hearings on 28<sup>th</sup> September;</li> <li>• To respond to a comment by Stanhope plc on paragraph 4.4.32</li> </ul>
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			<p>accommodation for a minimum period of time, particularly where the planning authority has been flexible over affordable housing provision or in the use of the Affordable Private Rent housing. Therefore, where viability assessments show that the full target affordable housing cannot be provided or where the provider proposes the provision of Affordable Private Rent Housing, managed by the owner of the development, the Council will expect the application to agree to a covenant tying the development to providing solely private rented accommodation for a minimum period of 30 years. Where viability testing demonstrates that affordable housing contributions are unviable, clawback mechanisms will be included as part of the planning permission to recoup the loss of affordable housing if any residential units are sold out of single ownership within the covenant period. <a href="#">Comments on assessing viability within policy H3 and its supporting text also apply to schemes under H4.</a> A charge towards the provision of additional affordable housing will be triggered where any private rented homes are sold within the development within <del>30</del><u>20</u> years of occupation of the completed development.”</p>	
MM21	80-83	H5, 4.4.36, 4.4.44 and 4.4.45	<p><b><u>“New build housing should be built to the following standards, <i>unless it can be clearly demonstrated that this would render a development unviable</i>:</u></b></p> <ul style="list-style-type: none"> <li><b><i>a. All new build housing outside the Central Area as defined on the Proposals Map will comply with the nationally-described space standard.</i></b></li> <li><b><i>b. All new build housing will be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations.</i></b></li> <li><b><i>c. All major new-build residential development should be designed to achieve zero carbon homes.</i></b></li> <li><b><i>d. All other new build housing will achieve at a minimum a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations.</i></b></li> <li><b><i>e. All new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations <del>where it is viable</del>, unless it is built in line with M4(3) (see below).</i></b></li> </ul>	<p>Changes for the following reasons:</p> <ul style="list-style-type: none"> <li>• To include flexibility for circumstances where standards render a development unviable, as discussed at hearings on 28<sup>th</sup> September</li> <li>• To reflect the regulations on the dwellings to which part M4(3) should be applied.</li> <li>• To respond to a comment by Unite Students.</li> <li>• To provide greater clarity on the application of zero carbon homes, as discussed at hearings on 28<sup>th</sup> September.</li> </ul>

			<p><i>f. On developments of 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations. <u>Any market homes provided to meet this requirement will be 'wheelchair adaptable' as defined in part M, whilst homes where the Council is responsible for allocating or nominating an individual may be 'wheelchair accessible'.</u></i></p> <p>4.4.35 The Government has sought to consolidate the wide range of standards required for new housing across the country. The approach has been to rely on minimum requirements in the Building Regulations for most matters, but to set a small number of 'optional' national standards over and above the Building Regulations minima, which local planning authorities can choose to apply in their areas. These 'optional' standards cover internal space, water efficiency and accessibility. Local planning authorities cannot seek any additional, or higher, standards for new housing.</p> <p>4.4.36 These 'optional' standards can only apply where a policy is included in a Local Plan. This policy therefore applies those standards in Reading Borough. It should be noted that the standards are only 'optional' for the local planning authority to apply in their areas, but that once applied, compliance in line with the policy is compulsory. Conditions will be applied to relevant planning permissions to ensure compliance with the policy. For water efficiency and accessibility, the standards will be applied through the Building Regulations. Planning conditions may be required to secure compliance. Where references to the Building Regulations in the policy change, the requirement shall be taken to refer to the most up-to-date standard. Housing in the centre will also need to consider the requirements of policy CR6. <u>These standards apply to residential uses in the C3 use class only.</u>"</p> <p>...</p> <p><b>Emissions</b></p> <p>4.4.43 Reading's Climate Change Strategy (Reading Means Business on Climate Change 2013-2020) sets challenging targets for tackling the Borough's contribution to climate change, and aims to reduce Reading's carbon footprint by 34% by 2020 in comparison to 2005 levels. One of the Strategy's strategic principles is that buildings in Reading should be built to high standards of energy efficiency incorporating on-site renewable</p>	
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			<p>energy where possible. Given the scale of residential development in Reading up to 2036, achieving the aims of the Climate Change Strategy will not be possible without that development having a minimal impact on carbon emissions.</p> <p>4.4.44 Therefore, the requirement will be that major new housing is built to zero carbon homes standard. A revised Sustainable Design and Construction SPD <a href="#">to be produced in 2019</a> will contain more detail on achieving this requirement, but in general, <a href="#">where homes are not designed to be carbon neutral</a>, this will mean as a minimum a 35% improvement <a href="#">in the dwelling emission rate</a> over the 2013 Building Regulations<sup>81</sup> plus a contribution of £1,800 per tonne towards carbon offsetting within Reading (calculated as £60 per tonne over a 30 year period). Where it is proposed to meet the zero carbon homes requirement in another way, clear evidence should be provided to demonstrate how it will be achieved at planning application stage. Zero carbon homes is an achievable standard that, until recently, was intended to be a national requirement in the Building Regulations. All other housing should be built to a level equivalent to the emissions requirement of former Code for Sustainable Homes Level 4, which is a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations. Where the 19% reduction in carbon dioxide emissions cannot be achieved on site, an offset may be possible through planning contributions. Further guidance on such an off-set will follow the Local Plan.</p> <p><b>Accessibility</b></p> <p>4.4.45 There are two levels of ‘optional’ standards for accessibility. M4(2) of the Building Regulations is for accessible and adaptable dwellings, and relates to relatively straightforward design measures that can allow homes to be adaptable as the needs of the occupier change. In that sense, it is broadly in the same vein as Lifetime Homes, although not identical. M4(3) relates more specifically to wheelchair user housing. The specific requirements can be seen in the Part M approved document<sup>82</sup>. <a href="#">In terms of part M4(3), Part M distinguishes between ‘wheelchair accessible’ dwellings (which apply only where the Council is responsible for allocating or nominating an individual) and ‘wheelchair adaptable’ dwellings (which can apply to any homes), and the policy therefore reflects this distinction.</a>”</p>	
MM22	94-95	4.4.95-4.4.98	<p>“4.4.95 Reading has a strong student population, drawn by the University of Reading and also by Reading College. This population brings many benefits to the area, in terms of supporting services and facilities, and means a strong supply of well-qualified</p>	<p>To be more precise about existing need for student accommodation and to</p>

		<p>people, many of whom remain in the Borough after graduation and make a major contribution to its economic success. It is important that sufficient accommodation is provided to enable students to live close to where they study. <a href="#">The Council particularly recognises the benefits of purpose-built student accommodation where there is a partnership arrangement with a further or higher education institution and where it offers accommodation that meets the needs of students in terms of facilities, convenience to places of study and in terms of the cost of accommodation.</a></p> <p>4.4.96 The SHMA (2016) looked at the issue of need for additional student housing. It anticipates a growth in student numbers at the University of Reading from 13,135 in 2015 to 16,095 in 2018. However, the SHMA notes that, as this is in line with historic high student numbers, that it should not result in the need for significant new accommodation. More recent evidence from the University indicates that this growth, <a href="#">underpinned by changes to the tuition fee system and the removal of student number controls, will have</a> indeed generated a need for new accommodation. <a href="#">In 2016/17, 74% of students were from outside the South East, and 28% were from outside the UK, and these groups are particularly reliant on student accommodation. There is current shortfall in University accommodation of around 1,000 bed spaces for first year students and, across all years of study, for 2017/18, 5,000 students were not housed in purpose built student accommodation.</a></p> <p><a href="#">4.4.97</a> It is considered that this <a href="#">existing</a> need should mainly be met on campus or through reconfiguration and redevelopment of existing halls of residence, subject to considerations of amenity and character. <a href="#">The St Patrick's Hall site has been identified in policy ER1e as such a proposed site. Its delivery will help to address the student guarantee (where first year students who have the University as their first choice are guaranteed accommodation). Additional accommodation beyond this will need to demonstrate why it cannot be met on those sites.</a></p> <p><a href="#">4.4.978</a> However, the need for student accommodation is highly dependent on any expansion of the University. <a href="#">Whilst the University's plans for the next five years are clear, the intentions up to 2036 are less so, and there is therefore potential for change in later parts of the plan period. The University has expressed intentions for significant growth in student numbers up to 2028. Where such growth requires planning permission, it will need to be tested against policies OU1 and, depending on location, ER2, to ensure it can be supported by appropriate student accommodation.</a> The need</p>	<p>reflect agreement on changes within the Statement of Common Ground with the University of Reading (EC042), and to clarify why two allocations in the Local Plan do not comply with the locational principle in H12, as discussed in hearings on 28th September.</p>
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			<p>for future expansion of accommodation will therefore need to be kept under review.</p> <p>4.4.989 The provision of new student accommodation needs to be balanced against other types of housing. <del>Whilst it is</del> likely that purpose built student housing, <u>where it is affordable to those students currently in HMOs</u>, can free up some existing homes to meet more general needs, <u>and there is evidence that in those recent years where numbers of students in HMOs have dropped, this has coincided with the opening of large new on-campus student accommodation blocks</u>. However, the Council considers <u>that</u> there are many sites where development for students prevents a potential housing site being used to help to meet the more pressing needs for general housing, including affordable housing. Development for students should therefore be <del>limited to</del> <u>prioritised towards</u> established student locations, unless a specific need for a development in a certain location can be clearly demonstrated.</p> <p>4.4.100 This Local Plan identifies two sites (CR13a and ER1a) for student accommodation in locations which do not comply with the above policy. In both cases, there are specific circumstances which justify these allocations. Site ER1a already has planning permission for student accommodation. In the case of CR13a, this includes a listed prison building of considerable historic sensitivity which may be challenging to convert, and the importance of securing a beneficial future use for the building means that the policy must keep the options for possible future uses open.”</p>	
MM23	95	H13	<p><b>“Proposals should</b></p> <ul style="list-style-type: none"> <li><del>i) Meet an identified need for gypsy, traveller or travelling showpeople accommodation within Reading;</del></li> <li><b>ii) Have safe and convenient access onto the highway network;</b></li> <li><b>iii) Have good access to a range of facilities including education and healthcare by a choice of means of travel, including walking;</b></li> <li><del>iii) Not have an unacceptable impact on the physical and visual character and quality of the area;</del></li> <li><b>iv) Not result in an adverse impact on the significance of a heritage asset;</b></li> <li><b>v) Be located in line with national and local policy on flood risk, and not involve location of caravans in Flood Zone 3;</b></li> <li><b>vi) Not have an unacceptable impact on the amenity of existing residents in surrounding areas, or on future residents of the proposal; and</b></li> <li><b>vii) Not result in the loss of biodiversity or important trees, and provide a net</b></li> </ul>	To reflect ‘Planning Policy for Traveller Sites’, as noted in Council’s Response to Issue 7 (EC009)



			<b><i>biodiversity gain where possible.”</i></b>	
MM24	96	4.4.100	<p>“In terms of permanent and transit accommodation for gypsies and travellers, the Council has gone through a thorough site assessment process, which culminated in a consultation on gypsy and traveller provision during September and October 2017. The conclusion was that, <del>whilst one site could potentially meet the identified transit needs (which is identified in policy WR4),</del> there were no sites that could meet the permanent <u>or transit</u> accommodation needs. The Council is exploring with its neighbours whether there are options for meeting <u>this the permanent</u> need outside the Borough, <u>and continues to look for opportunities to make transit provision within Reading</u>. In terms of travelling showpeople, the small need identified is unlikely to be able to support a new site on its own, and therefore any proposal for expansion of the existing site will need to be considered on its merits.”</p>	To reflect removal of policy WR4 (see MM57).
MM25	98	4.5.3	<p>“Major developments (<del>over</del> 10 dwellings or 1,000 sq m of non-residential floorspace <u>or more</u>) can make a particular contribution to achieving the strategy. In these cases, it is important that users of, and visitors to the development can make sustainable travel choices using non-car modes of transport. This should include provision that enables and supports walking, cycling and the use of public transport including from the development.”</p>	To be consistent with definition of major development.
MM26	99	TR2	<p><b><i>“Priority will be given to the implementation of the major transport projects identified in the Local Transport Plan (or any successor document) and other identified major transport projects. Land required for these projects will be safeguarded <u>where necessary</u>. These will include: ...”</i></b></p>	To make clear that project does not require land safeguarding, as referenced in Council Response to Issue 8 (EC010)
MM27	100	4.5.8	<p><b>“Park and Ride:</b> Despite recent new park and ride provision at Mere oak and Winnersh (both in Wokingham Borough), there is a continued need for new provision. Opportunities for new sites will therefore be sought, particularly on the corridors identified on figure 4.8. The constraints of the Borough mean that the sites are most likely to be in adjoining authorities, and the Council will continue to work with its neighbours to bring new facilities forward. <u>A new park and ride is permitted at Thames Valley Park in Wokingham, and the Council has also discussed the potential for park and ride in West Berkshire and South Oxfordshire with the relevant authorities over a number of years, but no sites have yet been formally proposed. Specific proposals will be supported by a business case showing the benefits of the scheme. These p</u><del>ar</del><u>k and ride sites</u><del> can</del> complement existing bus services, including inter-urban buses, by supporting their use.”</p>	To refer to discussions that have already taken place, as discussed at hearings on 2 <sup>nd</sup> October.

MM28*	106	RL2	<p><i>“Retail and main town centre leisure and culture development, where it would mean a net gain of over 2,500 sq m, will take place in, or as an extension to, the centre of Reading, unless it is on a site allocated for such development. Where a need for additional development has been identified, and no sites are available in or adjoining the centre of Reading, <u>or other defined centres</u>, a sequential approach should be adopted to identifying alternative sites.”</i></p>	To respond to a comment by Hermes
MM29	110-112	RL3, 4.6.18 and 4.6.21	<p><i>b) Within district, major local and local centres, development will be permitted provided that:</i></p> <ul style="list-style-type: none"> <li><i>• There would be no more than 2 consecutive A5 takeaways, and no more than 30% of the length of the Key Frontage would be in takeaway use; and</i></li> <li><i>• There would be no net loss of ‘centre uses’ for ‘non-centre uses’ at the ground floor (apart from entrances to upper floors) except in exceptional circumstances. On upper floors, other uses including residential (‘living over the shops’) will be acceptable.</i></li> </ul> <p><i>c) Within and adjacent to district, major local and local centres, all new development should provide some ‘centre uses’ at the ground floor, unless it can be clearly demonstrated that this would not be possible or appropriate.</i></p> <p><u><i>d) Where the Key Frontages within a centre as identified on the Proposals Map are proposed to significantly change, or have already significantly changed, as a result of redevelopment, meaning that criteria a) and b) cannot be applied, proposals should ensure that a strong retail character is retained within the ground floor of the centre, and that ground floor concentrations of consecutive units not in A1 or A2 use, in particular A5 takeaways, are avoided.</i></u></p> <p>...</p> <p>4.6.18 Criterion (b) has two purposes. Firstly, concentrations of takeaways can have a negative effect on the amenity of residents, and can also change the character of the street. Its other purpose is to prevent inappropriate uses, particularly housing, from encroaching on centres at the ground floor and permanently removing shop units or other facilities. Elsewhere in the country, whole centres have been lost in this way. However, it is important that uses such as housing and offices are integrated into centres at upper floors to ensure diversity and good access to jobs and housing. Exceptional circumstances are those where it can be clearly demonstrated that the</p>	To deal with a situation where a major redevelopment within a centre alters the key frontages and means that criteria a) and b) cannot be applied, and to clarify that the requirement is not that a unit must already have been vacant for 5 years, as discussed at hearings on 2 <sup>nd</sup> October.

			<p>only alternative to loss of the unit to any ‘centre use’ is long-term vacancy (e.g. <a href="#">that it could be expected to be vacant</a> for longer than 5 years).</p> <p>4.6.19 Finally, criterion (c) recognises the fact that opportunities for expansion of these centres are relatively rare, and therefore, where they do occur, they should be seized, in order to enhance the role of centres in serving their local communities.</p> <p>4.6.20 Where the policy includes the term ‘consecutive’ under (a) and (b), this includes where units are separated by the entrance to a side-street or footpath, or any other small gap between buildings.</p> <p>4.6.21 References to ‘key frontage’ in this policy, e.g. for proportion of A1/A2 use, will not be capable of being applied where there is a comprehensive development of a centre, <a href="#">or a part of a centre</a>, that significantly alters the frontages. In such a case, developments need to be judged against <del>other policies, notably RL1</del><a href="#">criterion d) of the policy</a>.</p> <p>4.6.22 This policy does not apply to the town centre of Reading. A different approach is required there, which is dealt with in Policy CR7.”</p>	
MM30	115-116	OU1 and 4.7.9	<p><b>“OU1: NEW AND EXISTING COMMUNITY FACILITIES</b></p> <p><i>Proposals for new, extended or improved community facilities will be acceptable, particularly where this will involve co-location of facilities on a single site. Proposals for on-site intensification of important facilities, such as schools and healthcare uses, will be supported, subject to other policies in the plan. Proposals for additional development for further and higher education will only be acceptable where it can be demonstrated that <a href="#">it would not lead to a material increase in the need for student accommodation, or that <del>additional students can be housed in it</del> will be supported by an appropriate increase in</a> existing or planned student accommodation.</i></p> <p>...</p> <p>4.7.8 There are some significant sites in Reading where continued development to help fulfil the site’s role in providing for the community is likely to be needed, for instance Reading College. This will be acceptable, subject to other policies in the plan. Development at the University of Reading Whiteknights Campus in dealt with in policy</p>	To take account of development that would not generate a material need for new accommodation as discussed at hearings on 28 <sup>th</sup> September and reflected in the Statement of Common Ground with the University of Reading (EC042)

			<p>ER2 and at the Royal Berkshire Hospital in policy ER3.</p> <p>4.7.9 However, it must be recognised that further and higher education expansion can put pressure on the housing market, <del>through students being housed in existing dwellings, or through new student accommodation on sites that could otherwise be used to address the general housing need</del>. Given the scale of the need for new homes in Reading, this must be carefully managed. Therefore, applications for academic development that would <del>bring additional students to live in Reading must lead to a material increase in additional students needing student accommodation should be paired with supported by an corresponding appropriate increase in dedicated existing or planned student accommodation</del>. This should be <del>on existing campuses or existing student accommodation sites, considered</del> in line with policy H12.”</p>	
MM31*	118	OU3	<p><b><i>“Proposals for telecommunications development will be permitted provided that:</i></b></p> <ul style="list-style-type: none"> <li><b><i>• They do not have an adverse impact on the visual amenity of the surrounding area <u>or on the significance of a heritage asset</u>;</i></b></li> <li><b><i>• The apparatus will be sited and designed so as to minimise its visual impact by the use of innovative design solutions such as lamp column ‘swap-outs’ or concealment/camouflage options; and</i></b></li> <li><b><i>• Alternative sites and site-sharing options have been fully investigated and it has been demonstrated that no preferable alternative sites are potentially available which would result in a development that would be less visually intrusive.”</i></b></li> </ul>	To respond to a comment by Historic England
MM32*	120	4.7.26	<p>“Despite the fact that the policy does not deal specifically with types of advertisements, some types are unlikely to be considered appropriate in terms of how visual amenity and safety is defined in the policy. Freestanding advert panels in urban streets, for instance, can have a significant detrimental effect on views of the streetscene. <u>Bulky box fascia and projecting signs, often crudely attached onto existing fascias, create a poor visual impression and will not generally be acceptable</u> <del>Projecting box-type signs, bulky folded box fascia signs, uplighters and downlighters are also likely to detract from the character of an area.</del> Whole fascia internal illumination should be avoided. <u>Care should be taken to ensure that illumination is in keeping with the character of the area, particularly where it would affect heritage assets, for instance face Face</u> or halo illumination of individual letters <del>is more may be</del> appropriate and discreet slim-line LED downlighters may be acceptable. Advertisements above ground floor level are <del>also likely to have particularly prominent and care should be taken to</del></p>	To respond to a comment by British Sign and Graphics Association

			<a href="#">avoid</a> detrimental effects on visual amenity.”	
MM33*	129	CR1	“The Central Area boundary as shown on the Proposals Map will mark the edge of the town centre <del>in most cases</del> <a href="#">other than where specified</a> . However, for the purposes of application of the sequential test for main town centre uses, the following definitions as defined on the Proposals Map are used:”	To respond to a comment by K2 Developments
MM34*	131	CR3	“v. The public realm should conserve and enhance the historic environment of the centre and the <a href="#">significance of</a> heritage assets therein and their setting, including through layout, materials, hard and soft landscaping. There may be opportunities for areas of public realm to provide improved access to and visibility for heritage assets.”	To respond to a comment by Historic England
MM35	132	CR4	“The River Thames is a prime location for new or improved <del>non-regionally significant</del> tourist attractions, and as such, this area is suitable for informal recreation and sporting uses and associated small-scale development, as well as improvements to management and access. Development or improvements in this area will be expected to add to or maintain the setting and character of the Thames and to conserve and enhance ecological value.”	To remove wording related to the now-revoked South East Plan, as set out in Council’s Response to Issue 10 (EC012)
MM36*	140	CR10	“• <del>Preserve</del> <a href="#">Conserve</a> and, where possible, enhance the setting of conservation areas and listed buildings;”	To respond to a comment by Historic England
MM37*	145	CR11a	“CR11a, FRIAR STREET & STATION ROAD: There will be active retail and leisure uses on the ground floor along Friar Street and Station Road, with a mix of uses on higher floors. Development should enhance linkages in a north-south direction to link to the Station Hill area. Listed buildings and their settings in the area will be conserved, and opportunities to improve the environment of Merchants Place will be sought. Site size: 1.36 ha      Indicative potential: 150-270 dwellings, <del>no significant net gain in</del> <a href="#">offices</a> , <del>or</del> retail and leisure <a href="#">(no significant net gain assumed)</a> ”	To respond to a comment by K2 Developments
MM38*	145	CR11b	“CR11b, GREYFRIARS ROAD CORNER: There will be active retail and leisure uses on the ground floor along Friar Street, with a mix of uses on higher floors and in the rest of the area. The edge of the site nearest to the areas of traditional terracing west of Greyfriars Road will require careful design treatment. Site size: 0.37 ha      Indicative potential: 90-140 dwellings, <del>no significant net gain in</del> <a href="#">offices</a> <del>or</del> retail and leisure <a href="#">(no significant net</a>	For consistency with changes to CR11a

			<u>gain assumed)</u> "	
MM39*	145	CR11c	<p><b>"CR11c, STATION HILL &amp; FRIARS WALK:</b></p> <p><i>This area will be developed for a mix of uses at a high density, including retail and leisure on the ground and lower floors and residential and offices on higher floors. There will be enhanced links through the site, including in a north-south direction into the Station Hill area and through to the station, and a network of streets and spaces. Frontages on key routes through the site should have active uses. The edge of the site nearest to the areas of traditional terracing west of Greyfriars Road will require careful design treatment.</i></p> <p>Site size: 2.87 ha      Indicative potential: 380-570 dwellings, 80,000-100,000 sq m of offices, <del>no significant net gain in</del> retail and leisure <u>(no significant net gain assumed)</u>"</p>	For consistency with changes to CR11a
MM40*	146	CR11g	<p><b>"CR11g, RIVERSIDE:</b></p> <p><i>Development should maintain and enhance public access along and to the Thames, and should be set back at least ten metres from the <u>top of the bank of the</u> river. Development should continue the high quality route including a green link from the north of the station to the Christchurch Bridge, with potential for an area of open space at the riverside. The main use of the site should be residential, although some small-scale <del>offices and leisure</del> <u>leisure and complementary offices</u> will also be <del>appropriate</del> <u>acceptable</u>. <u>Development should take account of mitigation required as a result of a Flood Risk Assessment.</u></i></p> <p>Site size: 1.24 ha      Indicative potential: 250-370 dwellings, 1,000-2,000 sq m of leisure, no significant net gain in offices."</p>	To respond to comments by SSE Ltd and the Environment Agency
MM41	149	5.4.12	<p>"Parts of the Station/River Major Opportunity Area, particularly north of the railway line, are within both Flood Zones 2 and 3a <u>as shown in the SFRA</u><sup>109</sup>. However, this must be weighed against the vital role that these sites will play in regeneration in the centre. A sequential and exceptions test in line with the NPPF has been carried out in identifying these sites for development, and this <del>will be</del> <u>is</u> available on the Council's website as background evidence. <u>Where a more detailed assessment at planning applications stage finds that the site falls partly in Flood Zone 3 (e.g. for CR11g or CR11i), flood mitigation measures should be designed to the 1 in 100 year level plus a 35% allowance for climate change, and residual risk should be assessed against the 70% allowance (with both extents shown in the 2017 SFRA).</u> Individual applications will need to provide their own Flood Risk Assessment. Detailed proposals on these sites will need to consider how the mix of uses is best distributed taking flooding guidance into</p>	To reflect national policy guidance on flood risk as discussed at hearings on 3 <sup>rd</sup> October.

			account.”	
MM42	150	CR12a	<p><b>“CR12a, CATTLE MARKET:</b></p> <p><i>This site will be developed for a mix of edge-of-centre retail uses, and residential development, along with public car parking. The retail may include bulky goods, but should not include a significant element of non-bulky comparison goods retail. It and must be designed to <del>mesh into the urban fabric</del> <u>reflect the urban grid layout and built form of the centre</u> and a single storey retail warehouse will not be permitted. Development should take account of mitigation required as a result of a Flood Risk Assessment.</i></p> <p><i>Site size: 2.46 ha      Indicative potential: 330-490 dwellings, 10,000-15,000 sq m net gain of retail.”</i></p>	To make it clearer how a decision-maker should respond as discussed at hearings on 3 <sup>rd</sup> October
MM43	151	CR12b	<p><b>“CR12b: GREAT KNOLLYS STREET AND WELDALE STREET:</b></p> <p><i>This area will be developed primarily for residential. Any development which would result in the loss of small business units should seek to replace <del>some</del> <u>as many</u> of those units <u>as possible</u>, preferably on site. There should be a careful transition to the lower density residential areas to the west. Listed buildings and their settings in the area will be conserved and where possible enhanced.</i></p> <p><i>Site size: 3.02 ha      Indicative potential: 280-<del>430</del><u>510</u> dwellings, no significant net gain of other uses.”</i></p>	To make it clearer how a decision-maker should respond as discussed at hearings on 3 <sup>rd</sup> October and to take into account the recent planning permission as set out in Council’s note on dwelling ranges EC021
MM44**	151-153	CR12e and 5.4.17	<p><b>“CR12e, HOSIER STREET:</b></p> <p><i>Development on this site will result in a new residential community centred around an improved area of public open space and a high quality environment, with an improved entrance to the site from St Mary’s Butts. The edges of the open space will be activated with retail, leisure and/or other main town centre uses such as hotel use, and development may also include some limited offices uses. The Hexagon theatre will only be developed if a replacement facility for Reading is provided, and approaches to the theatre will be improved. The Hexagon theatre will only be developed if a replacement facility for Reading <u>expected to be in the same area</u>, is provided, and approaches to the theatre will be improved. Development will also include a replacement site for the street market. The car parking below ground level will be retained and incorporated into the development.</i></p> <p><i>Site size: 3.41 ha      Indicative potential: 500-750 dwellings, 4,000-6,000 sq m of retail and leisure.</i></p>	To provide clarity as referred to in Council Response to Issue 10 (EC012), to respond to a comment by the Theatres Trust and to bring the policy and supporting text into line as discussed in hearings on 3 <sup>rd</sup> October.



			<p>...</p> <p>5.4.17 In the Hosier Street area, the old civic offices have now been demolished, and the need for replacement of the Hexagon theatre has been recognised for some time. The Hexagon is not suited to modern theatre requirements and is expensive to maintain. The policy <u>proposes-requires that, where the Hexagon site is proposed to be developed, there should be replacement, which is expected to be</u> within the same area. <u>There will need to be liaison with The Theatres Trust on any proposed replacement.</u>”</p>	
MM45	154-157	CR13a and 5.4.28	<p><b>“CR13a, READING PRISON:</b></p> <p><i>The prison building itself is of historical significance and is listed, and its historic significance will be conserved and where possible enhanced. The building would be used for <u>a use compatible with its heritage, which might include</u> residential or student accommodation, commercial offices or a hotel, and should include some cultural or heritage element or related retail and leisure that draws on its significance. The site is part of a scheduled ancient monument, and therefore any additional development will be dependent on a thorough demonstration that it would not have detrimental impacts on the significant archaeological interest. The prison adjoins the Abbey Quarter, and development should therefore enhance that area as a heritage destination.</i></p> <p><b>Site size: 1.44 ha      Indicative potential: conversion of prison could result in 65-90 dwellings. No figures for additional development, as highly dependent on assessment of archaeology.</b></p> <p>...</p> <p>5.4.28 Figure 5.5 shows the broad strategy for the East Side Major Opportunity Area, which indicates some of the elements that need to be taken into account in developing this area. The Proposals Map gives greater detail on some matters, such as designation of the Major Opportunity Area and Sub-Areas. There are existing Supplementary Planning Documents covering parts of the site. The Reading Prison Framework was recently adopted, and continues to be relevant. Reading Prison is a highly constrained site, and the Framework contains much more detailed information on these issues and how they should be addressed. <u>It is important that options for uses that may secure</u></p>	<p>To ensure that any use of the listed building is compatible with its heritage, and to explain the reason that this is considered an exception to H12, as discussed in hearings on 3rd October as discussed in hearings on 3<sup>rd</sup> October</p>



			<p><u>the future of the listed prison building are kept open at this stage, which is why student accommodation remains under consideration in a site that would otherwise be contrary to policy H12.</u> The Kenavon Drive Urban Design Concept Statement also provides useful guidance, but it predates the Local Plan by some years, so where there is any conflict with policy CR13, the Plan policy takes precedence.”</p>	
MM46*	155	CR13b	<p><b>“CR13b, FORBURY RETAIL PARK:</b></p> <p><i>This site would be the focus of the new residential community, and, alongside residential, additional retail, leisure and community uses at a scale to serve the Kenavon Drive area would be appropriate. It should include a new area of open space and enhance the frontage to the canal, including a buffer zone to the <u>top of the</u> canal bank to reflect its wildlife significance. Implementing this policy may involve complete redevelopment or using new additional development to improve the existing urban form of the area. Some parts of the site are likely to be implemented in the long term.</i></p> <p><i>Site size: 6.99 ha      Indicative potential: 1,230-1,840 dwellings, no net gain of retail.”</i></p>	To respond to a comment by the Environment Agency
MM47	155	CR13c	<p><b>“CR13c, KENAVON DRIVE &amp; FORBURY BUSINESS PARK:</b></p> <p><i>This site would be largely residential in nature, although opportunities to create an area of open space close to the Kennet should be sought. Development will link into the newly-opened pedestrian link under the railway to Napier Road.</i></p> <p><i>Site size: 2.07 ha      Indicative potential: <del>130-190</del><u>190-285</u> dwellings.”</i></p>	To take into account potential to accommodate more dwellings as set out in Council’s note on dwelling ranges EC021
MM48**	155	CR13d	<p><b>“CR13d, GAS HOLDER:</b></p> <p><i>This area will be used for residential development. Development should enhance the character of the <del>mouth of the</del> Kennet and should maximise the potential of the site to be a river gateway to Reading. Public access along the river <del>to the Kennet Mouth</del> will be sought. Development should be set back at least ten metres from the <u>top of the bank of the</u> river <del>and allow for a wildlife corridor along the river to</del> <u>reflect its wildlife significance.</u> Development should take account of potential contamination on the site.</i></p> <p><i>Site size: 0.71 ha      Indicative potential: 46-70 dwellings.”</i></p>	To respond to comments by SGN and Danescroft and the Environment Agency, to bring into line with CR13b, and to reflect discussion at hearings on 3 <sup>rd</sup> October.
MM49	161	CR14m	<p><b>“CR14m CAVERSHAM LOCK ISLAND AND CAVERSHAM WEIR, THAMES SIDE</b></p> <p><i>Development for water-compatible leisure or tourism uses, including some operational development. <u>Potential for Proposals including</u> enhanced pedestrian access <u>and/or</u>. <del>Potential</del> use of weir for generation of hydropower <u>will be</u></i></p>	To make it clear how a decision-maker should respond as discussed in hearings on 3 <sup>rd</sup> October

			<p><u>acceptable.</u></p> <p>Development should:</p> <ul style="list-style-type: none"> <li>• Address flood risk issues;</li> <li>• Retain important trees on site;</li> <li>• Avoid harm to the setting of the listed Kings Meadow pool;</li> <li>• Take account of potential archaeological significance;</li> <li>• Avoid a detrimental impact on the biodiversity value of the River Thames, and set buildings back at least ten metres from the top of the bank of the river; Retain public access across the site; and</li> <li>• Not impact on the operation of the lock and weir.</li> </ul> <p>Site size: 0.5 ha      Indicative potential: 900-1,100 sq m of leisure use.”</p>	
MM50	161	5.3.34	<p>“Where there are significant issues that will need to be addressed in any planning applications on the specific sites listed above, these are usually highlighted in the policy, <u>and usually correspond to other policies in the Local Plan, such as EN1, EN2, or EN11-18, where more detail is set out.</u> However, it is not a guarantee that there are no other potential issues, and it does not remove the need to address the usual matters that should be dealt with on all sites.”</p>	To provide further direction on how the criteria in site allocations should be applied, as discussed in hearings on 5 <sup>th</sup> October.
MM51*	164	CR16	<p>“The area east of Station Road and north of Friar Street, as shown on the Proposals Map, makes a positive contribution to the character of the town centre. The character of the <u>retail units in the Harris Arcade and the buildings fronting the streets overall Station Road and Friar Street frontages</u> will be <u>conserved maintained</u> and, where possible, enhanced. <del>Whilst there will be</del> <u>There is</u> potential for some conversion of buildings and, <del>potentially,</del> some development within the site that does not detrimentally affect its overall character. <del>However,</del> <u>proposals for wholesale redevelopment that would detrimentally affect the overall character</u> will not be supported.”</p>	To respond to a comment by LaSalle Investment Management
MM52*	170	SR1a	<p>“SR1a, FORMER LANDFILL, ISLAND ROAD: The former landfill site will be developed for warehouse uses with some potential for industrial uses where it would not cause detrimental impacts to existing or planned residential. Development on past landfilled areas will need to demonstrate that it will not cause any negative effects on human health or on the wider environment. The noisiest elements of the development should be located away from any existing or planned residential, in particular residential at Green Park to the south, and development should include an adequate landscaped buffer</p>	To respond to comments by the Environment Agency and Roxhill Developments Ltd

			<p>to residential to ensure that there are no significant adverse effects through noise and disturbance, and a 10m undeveloped buffer to the <a href="#">top of the bank of the watercourse</a> to the east. Development should <a href="#">have regard to the development of the whole site and access should</a> be considered as a comprehensive whole.</p> <p>Site size: 32.13 ha      Indicative potential: 95,000-116,000 sq m of industrial/warehouse use”</p>	
MM53*	177	SR4e and SR4f	<p><b>“SR4e PART OF FORMER BERKSHIRE BREWERY SITE PART OF FORMER BERKSHIRE BREWERY SITE</b></p> <p><i>Development for employment uses. The site has an existing permission for 33,910 sq m of offices, but would also be suitable for industrial and warehouse development. Related commercial uses as part of the mix may also be appropriate, although proposals that would involve main town centre uses (excluding offices) will only be appropriate where there is no significant adverse impact on existing centres.</i></p> <p><i>Development should:</i></p> <ul style="list-style-type: none"> <li>• Enhance the setting of the listed Little Lea Farmhouse;</li> <li>• Provide for a green link along the A33 frontage;</li> <li>• Include a landscaped buffer to the watercourses around the site, with development set back at least 10m from the <a href="#">top of the bank of the river</a> wherever possible;</li> <li>• Address any contamination on site;</li> <li>• Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required; and</li> <li>• Safeguard land which is required for mass rapid transit routes and stops.</li> </ul> <p>Site size: 3.7 ha      11,000-13,000 sq m of industrial and warehousing</p> <p><b>SR4f LAND SOUTH WEST OF JUNCTION 11 OF THE M4      LAND SOUTH WEST OF JUNCTION 11 OF THE M4</b></p> <p><i>This land may be required for uses associated with any major development around Grazeley if identified in plans of Wokingham Borough Council and West Berkshire District Council. The form of any development, if identified, is yet to be determined, and therefore no further details can be set out in this policy. Any development will take account of potential archaeological significance and will need to ensure a 10m ecological buffer to the <a href="#">top of the bank of the watercourse</a>.</i></p>	To respond to a comment by the Environment Agency

			<b>Site size: 3.84 ha      No figures for development capacity"</b>	
MM54	178, 193, 200- 201, 209- 210	6.3.15, 7.3.14, 8.3.3, 9.3.3	<p><i>Change the wording in each of the four paragraphs as follows:</i></p> <p>"Where there are significant issues that will need to be addressed in any planning applications on the specific sites listed above, these are usually highlighted in the policy, <u>and usually correspond to other policies in the Local Plan, such as EN1, EN2, or EN11-18, where more detail is set out.</u> However, it is not a guarantee that there are no other potential issues, and it does not remove the need to address the usual matters that should be dealt with on all sites."</p>	To provide further direction on how the criteria in site allocations should be applied, as discussed in hearings on 5 <sup>th</sup> October.
MM55*	180	SR5 and 6.3.20	<p><b><i>"Use of the areas around the River Kennet for low-intensity leisure and recreation will be supported. The following sites in particular offer opportunities to enhance recreation and leisure provision:</i></b></p> <ul style="list-style-type: none"> <li>• <b><i>Former laboratory and fish farm, Fobney Mead</i></b></li> <li>• <b><i>Land north and east of Rose Kiln Lane</i></b></li> </ul> <p><b><i>These sites are located wholly or partly in the functional floodplain, and parts of the site and surrounding areas have strong significance for biodiversity. As such, the uses supported by this policy would be low-intensity in nature, with any built development of limited scale, and, within the functional floodplain, water-compatible.</i></b></p> <p><b><i>Any proposals will need to demonstrate that there will be no adverse impacts on biodiversity, flood risk, landscape, public foot and cycle access along the river <del>and</del>, the operation and condition of the river <u>and the operation of the adjacent Water Treatment Works</u>. If a proposal results in additional use of the Kennet by boats, it should not have an adverse effect on the River Kennet Site of Special Scientific Interest further upstream.</i></b></p> <p>6.3.19 With an increasing residential population in South Reading, as well as in other parts of the Borough, there is an opportunity to use the considerable asset of the River Kennet as a recreational resource to which these new residents have good access. However, these areas are heavily constrained by flood risk, biodiversity and landscape considerations, which means that an allocation for significant built leisure development cannot be made.</p>	To respond to a comment by Thames Water

			<p>6.3.20 This allocation is therefore limited to low-intensity uses, where built development is limited. A marina is a potential use, and the area north and east of Rose Kiln Lane was in the past identified for such a use. Other possible uses include visitor facilities (where appropriate to the flood risk designation) and accessible open spaces. The policy does not identify the sites for more intensive built leisure uses. Such uses would not be in line with national policy were they to be located within the functional flood plain, and additionally would need to pass other policy tests such as the sequential test for main town centre uses. <a href="#">Thames Water should be contacted at the earliest opportunity to discuss any potential proposal that would affect the Water Treatment Works.</a>”</p>	
MM56*	185	WR2	<p><i>“The existing Park Lane Primary School and associated playing fields, hard play areas, car parking and associated facilities will be reprovided on a single extended site at The Laurels, School Road, Tilehurst, which will include a replacement <a href="#">early years provision</a>, library and health clinic.”</i></p>	To respond to a comment by Jenny Cottee
MM57	194-195	WR4	<p><del>“<a href="#">Potential Traveller Transit Site at Cow Lane</a></del></p> <p><del><a href="#">WR4: POTENTIAL TRAVELLER TRANSIT SITE AT COW LANE</a></del></p> <p><del><i>This site has been identified as having potential for transit accommodation for travellers. This will continue to be explored by the Council. Any proposed development for transit accommodation should:</i></del></p> <ul style="list-style-type: none"> <li><del>• <i>At a minimum, provide five transit pitches, with each pitch capable of accommodating two caravans;</i></del></li> <li><del>• <i>Ensure that pitches are available to rent on a temporary basis only;</i></del></li> <li><del>• <i>Include access to the highway network that does not detrimentally affect the use of existing vehicular routes or public rights of way;</i></del></li> <li><del>• <i>Not have significant adverse effects on existing operations, in particular the Reading Festival;</i></del></li> <li><del>• <i>Not cause adverse effects on the local area in terms of public amenity and safety;</i></del></li> <li><del>• <i>Take account of the potential for flooding, including avoiding any location of</i></del></li> </ul>	The Council is no longer proposing this development, as referenced in Council’s Response to Initial Comments and Questions (EC001). This is because the site is essential to the Reading Festival, and is also proposed to be part of a new secondary school.

			<p><del>caravans within the small areas of the site in Flood Zone 3; and</del></p> <ul style="list-style-type: none"> <li><del>Be provided with a strong landscaped buffer to open spaces, commercial sites and the Richfield Avenue frontage.</del></li> </ul> <p><del>7.3.19 The need for transit accommodation for gypsies and travellers in Reading is highlighted in relation to policy H13 of this plan. A rise in the number of illegal encampments in Reading and the Thames Valley area over recent years has brought the issue of traveller accommodation into sharper focus. The provision of a transit site within Reading would enable the police to make use of powers under Section 62a to e of the Criminal Justice and Public Order Act 1994.</del></p> <p><del>7.3.20 The Cow Lane site emerged from a thorough assessment of the potential for provision for gypsies and travellers in the Borough. The site is in Council ownership, and is considered to be the only location in Reading where transit needs could potentially be met. More detailed consideration of the potential of the site, including the likely costs, will be needed before any detailed proposal can be made.</del></p> <p><del>7.3.21 It should be noted that there are existing commercial operations that could be affected. In particular, the site is currently used as part of the Reading Festival site, which takes place annually in August. The Festival is a major asset to the town, and any proposal will need to ensure that the ability of the Festival to operate will not be threatened.”</del></p>	
MM58**	198	CA1a	<p><b>“CA1a READING UNIVERSITY BOAT CLUB, THAMES PROMENADE</b></p> <p><b><u>Development for residential, <del>subject to relocation of the boat club.</del> Where retention of the existing boathouse is not proposed, development will only be permitted subject to its relocation or clear demonstration that its loss is justified in line with policy RL6 or national policy.</u></b></p> <p><b>Development should:</b></p> <ul style="list-style-type: none"> <li><b>Avoid detrimental visual effects on the Thames Valley major landscape feature;</b></li> <li><b>Take account of the risk of flooding, and locate development only in the portion of the site in Flood Zone 2, closest to Abbotsmead Road;</b></li> <li><b>Provide for a green link across the site from Christchurch Meadows to Abbotsmead Road; and</b></li> </ul>	<p>To allow for retention of the Boat Club, as proposed in the University of Reading’s Response to Issue 13 (EP030) and Statement of Common Ground with the University of Reading (EC042), and to respond to a comment by University of Reading</p>

			<ul style="list-style-type: none"> <li>• Take account of potential archaeological significance, and be supported by a desk-based archaeological assessment which should inform the development.</li> </ul> <p>Site size: 0.56 ha      16-25 dwellings”</p>	
MM59	199-200	CA1b	<p>“CA1b PART OF READING GOLF COURSE, KIDMORE END ROAD:</p> <p>Development for residential and replacement clubhouse, subject to <del>additional land in South Oxfordshire being secured for replacement holes the future provision of golf on the remainder of the Golf Club site, which fulfils an important sports and leisure function for Reading, being secured</del>. On-site facilities should be provided to mitigate impacts on community infrastructure, <del>for instance including</del> for healthcare. On-site public open space will be provided.</p> <p>Development should:</p> <ul style="list-style-type: none"> <li>• Avoid adverse effects on important trees including those protected by TPO;</li> <li>• Provide a green link across the site from Kidmore End Road to the remainder of the golf course, rich in plant species and habitat opportunities;</li> <li>• <u>Ensure that vehicular access is provided from suitable roads to the area to be retained for golf;</u></li> <li>• Take measures to mitigate impacts on the highway network, particularly on Kidmore End Road <u>and Tanners Lane;</u></li> <li>• <u>Include all parking requirements within the site to avoid exacerbating parking issues on existing streets;</u></li> <li>• Take account of potential archaeological significance; and</li> <li>• Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required.</li> </ul> <p>Site size: 3.75 ha      90-130 dwellings, community provision including healthcare and replacement clubhouse”</p> <p>Add new paragraph and renumber subsequent paragraphs:</p> <p><u>“8.3.2 Residential development on the part of the Reading Golf Club site identified as CA1b is dependent on ensuring the future use of the remaining land for golf, in line with the need to protect important sports and leisure facilities set out in Policy RL6. Development will need to be careful to ensure that vehicular access from suitable roads continues to be provided to the remaining golf uses to ensure that they remain operable. A legal agreement will be necessary to ensure</u></p>	<p>To include greater flexibility as set out in the Council’s Comments on Submission by Wates Developments Ltd and Reading Golf Club (EP045), and to reflect the Inspector’s comments in the Post Hearing Advice.</p>





			<a href="#">that the golf function is retained, and development for residential will not take place until a replacement clubhouse is provided and vehicular access from suitable roads is in place.</a>	
MM60**	199	CA1d	<p><b>“CA1d REAR OF 200-214 HENLEY ROAD, 12-24 ALL HALLOWS ROAD &amp; 4, 7 &amp; 8 COPSE AVENUE</b></p> <p><i>Development for residential.</i></p> <p><i>Development should:</i></p> <ul style="list-style-type: none"> <li>• <i>Be accessed from Overton Drive;</i></li> <li>• <i>Be designed to retain important trees and groups of trees, and avoid adverse effects on important trees including that protected by TPO;</i></li> <li>• <i>Avoid a net loss of biodiversity, and provide for a net gain where possible;</i></li> <li>• <i>Provide for a green link <a href="#">across along the eastern boundary of the site adjoining the gardens of Copse Avenue from the copse to the north of the site southwards</a>;</i></li> <li>• <i>Take account of potential archaeological significance;</i></li> <li>• <i>Address air quality impacts on residential use <a href="#">relating to the southern portion of the site</a>;</i></li> <li>• <i>Address any contamination on site; and</i></li> <li>• <i>Ensure appropriate back-to-back separation from existing residential.</i></li> </ul> <p><i>Site size: 0.87 ha      17-25 dwellings”</i></p>	To avoid prescriptiveness about the location of the green link as discussed in hearings on 4 <sup>th</sup> October, and to respond to a comment by TA Fisher.
MM61*	200	CA1f	<p><b>“REAR OF 1 &amp; 3 WOODCOTE ROAD AND 21 ST PETER’S HILL</b></p> <p><i>Development for residential.</i></p> <p><i>Development should:</i></p> <ul style="list-style-type: none"> <li>• <i>Be accessed from Symeon Place;</i></li> <li>• <i>Retain established trees and vegetation around the edge of the site;</i></li> <li>• <i>Avoid a net loss of biodiversity, and provide for a net gain where possible; Take account of the high potential archaeological significance and be supported by assessment work <a href="#">which should inform the development</a>;</i></li> <li>• <i>Address air quality impacts on residential use; and</i></li> <li>• <i>Ensure appropriate back-to-back separation from existing residential.</i></li> </ul> <p><i>Site size: 0.33 ha      8-12 dwellings”</i></p>	To respond to a comment by Historic England
MM62**	201-202	CA2	<p><b>“Caversham Park and Caversham Park House are key features of the heritage and landscape of Reading. Caversham Park is a Registered Historic Park and Garden,</b></p>	To respond to a comment by the BBC; to reflect


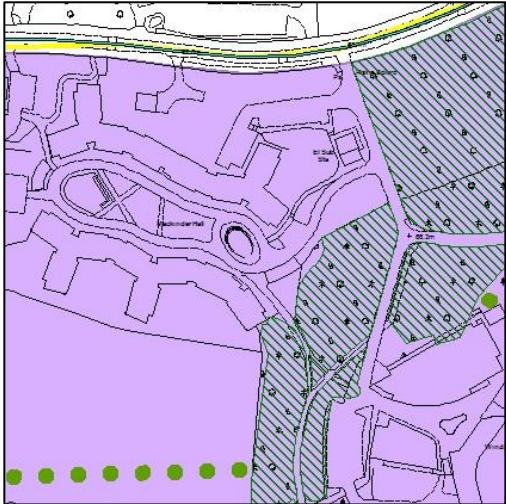


			<p><i>and the site contains a number of listed features. These assets will be conserved.</i></p> <p><i>Conversion of the house from offices to residential and/or a cultural, community or heritage use, <u>or other suitable use compatible with its heritage</u>, will be acceptable if it sustains the significance of the listed building. It is <u>currently</u> estimated that up to 40-45 dwellings could be accommodated, but the figure will be dependent on more detailed historic assessment of the building and the precise mix of uses.</i></p> <p><i>Any development or conversion proposals should open as much of the park as possible up to public access, including reinstatement of <u>any</u> historic public footpaths <u>where possible and appropriate</u>.</i></p> <p><i>This policy does not allocate the site for additional development over and above conversion of the house. There may be scope for some limited development on previously developed land within the site, which will need to be justified at application stage. Such development must comply with the criteria below:</i></p> <ul style="list-style-type: none"> <li><i>• No development will <del>harm the historic interest</del> <u>negatively affect the significance of heritage assets and their setting</u>;</i></li> <li><i>• <u>Development will not detract from the character or appearance of</u> <del>or the important landscape value of the site;</del> <u>and</u></i></li> <li><i>• Development will not <del>detrimentally negatively</del> affect <u>protected significant trees or areas of biodiversity importance</u>.</i></li> </ul>	<p>uncertainty about the existence of past historic public footpaths and their suitability as discussed at hearings on 4th October and agreed with the BBC; and to bring the criteria into line with the wording of the equivalent policies EN1, EN12, EN13 and EN14 as discussed at hearings on 4<sup>th</sup> October.</p>
MM63	205	9.2.7	<p>“The University of Reading is a vital part of Reading’s economy and life, and there will continue to be a need for development to support that role at its main Whiteknights campus, as well as its secondary campus at London Road. This development will be supported, where it does not result in significant adverse effects. However, there is clearly an issue around accommodating students in the area, with many <del>of</del>-existing homes in the area now occupied by students, and therefore concerns about various possible effects such as noise, parking and the sustainability of local services with less accommodation available for families. For this reason, an increase of purpose-built student accommodation is needed, but <del>this</del> <u>Council considers that first priority</u> should <u>preferably</u> be on the existing university sites, both to reduce the need to travel, particularly by car, and so that key sites elsewhere deliver much-needed general housing rather than student accommodation. The Whiteknights campus crosses the</p>	<p>To indicate the relationship between University growth and student accommodation as agreed in the Statement of Common Ground with the University of Reading (EC042)</p>

			boundary with Wokingham, and it is important that policy across the site is consistent.”	
MM64	207	ER1c	<p><b>“ER1c LAND REAR OF 8-26 REDLANDS ROAD</b></p> <p><i>Development for residential, <u>with potential for student accommodation or university uses reflecting the existing student accommodation use on the northern part of the site.</u></i></p> <p><i>Development should:</i></p> <ul style="list-style-type: none"> <li>• <i>Make a positive contribution to the conservation area and to the setting of adjacent listed buildings;</i></li> <li>• <i>Take account of potential archaeological significance;</i></li> <li>• <i>Retain the wall fronting Morgan Road; and</i></li> <li>• <i>Retain mature trees on the site and provide for a north-south green link, which will reduce the amount of the site that can be developed and will particularly limit development behind 14-24 Redlands Road.</i></li> </ul> <p><i>Site size: 0.74 ha 12-<del>18</del>20 dwellings”</i></p>	To reflect the potential for continuing use associated with the University as agreed in the Statement of Common Ground with the University of Reading (EC042)
MM65	211-212	ER2 and 9.3.10	<p><i>“The University of Reading is a national and international educational establishment of strategic importance which will continue to adapt and expand over the plan period. The Whiteknights Campus as shown on the Proposals Map will continue to be a focus for development associated with the University of Reading. Such development may include additional staff, teaching, research and enterprise accommodation, infrastructure and services, and sports and leisure facilities among other uses. Access to and within the site will be improved where necessary.</i></p> <p><i>Where development would result in <del>the a material</del> need for additional students to be housed <del>in Reading</del>, it should be supported by an <del>appropriate corresponding</del> increase in <u>existing or planned</u> student accommodation. Provision of new student accommodation on the Whiteknights Campus, or as a reconfiguration or extension of nearby dedicated accommodation, will therefore be acceptable subject to other policies in the Plan.</i></p> <p><i>Development will accord with the following criteria:</i></p> <ul style="list-style-type: none"> <li>• <i>Areas of wildlife significance and current or potential green links will be retained or enhanced, and not detrimentally affected by development, including through light effects;</i></li> </ul>	To bring the policy into line with the wording of OU1 as discussed at hearings on 5 <sup>th</sup> October, and to indicate the need for student accommodation, as agreed in the Statement of Common Ground with the University of Reading.

		<ul style="list-style-type: none"> <li>• <i>The safety of those using the campus will be maintained or enhanced;</i></li> <li>• <i>There will be no significant detrimental impact on the amenity of neighbouring residential properties; and</i></li> <li>• <i>The loss of undeveloped areas on the site will be weighed against the benefits of development to the wider community.</i></li> </ul> <p>...</p> <p>9.3.10 In 2008, the University drew up a Whiteknights Campus Development Plan, which set out the University's principles for future development of the site, including providing 1,297 additional bedspaces, waste and catering facilities and changes to the accesses and internal circulation. The Development Plan does not form part of the Council's strategy, but it outlines the changes that are proposed to occur on the site in the coming years, and has informed this policy. Much of the development proposed in that plan has now been built out, but there remains the likelihood of further development over the plan period, <u>including for student accommodation as a result of a growth in student numbers of 28% between 2007/8 and 2016/17, together with any additional growth over the plan period.</u>"</p>	
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MM66*	Map A	Proposals Map	<p><i>Change boundaries of site CA1d Rear of 200-214 Henley Road, 12-24 All Hallows Road and 4, 7 and 8 Copse Avenue.</i></p> <p><i>Boundaries before change:</i></p>  <p><i>Boundaries after change:</i></p> 	To respond to a comment by TA Fisher
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MM67	Map F	Proposals Map	<p><i>Change boundaries of areas of biodiversity significance to reflect actual location of woodland.</i></p> <p><i>Areas before change:</i></p>  <p><i>Areas after change:</i></p> 	<p>To reflect the fact that a small area immediately east of Mackinder Hall is not covered by woodland, as discussed at hearings on 5<sup>th</sup> October.</p>
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## **ANNEX 1: Note from Inspector (received 10<sup>th</sup> May 2019)**

Response on EC043 Additional Justification on Policy H3 – Main Modifications required

- Viability - agree with general principle of the proposed amendments to paragraph 4.4.23. However, additional information should be provided which provides further clarification of the approach that will be taken in the SPD for viability assessments for sites below 10 dwellings. 'focussed information' in the proposed wording is not sufficiently clear and could be open to interpretation. The MM could usefully incorporate the wording from para 7.1 of EC043 that explains the Council's pragmatic approach and expand on what types of information may be acceptable to be submitted (for example as described in para 7.4) with confirmation that further detail is to be provided in the SPD.
- In respect of the proposed MM for on-site provision for 5-9 dwellings having regard to the evidence provided in EC043 and during the examination - the requirement for 5-9 dwellings to make on-site provision should be removed from Policy H3, and replaced with a requirement for 20% equivalent in the form of a financial contribution with the wording as for sites of 1-4 dwellings (and the MM to incorporate any consequential changes).

Louise Gibbons  
Inspector