LOCAL PLAN BACKGROUND PAPER

Information to support the Submission Draft Reading Borough Local Plan

March 2018

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1. INTRODUCTION

- 1.1 The Local Plan and Proposals Map will, once adopted, set out the planning policies for Reading Borough up to 2036. The National Planning Policy Framework (NPPF, OP001) states that Local Plans should be "based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area" (paragraph 158). In order to be found sound, a Local Plan will need to be justified, which involves being based on proportionate evidence.
- 1.2 Planning Practice Guidance provides more detail on assembling an appropriate evidence base to support a Local Plan. It states that:

"Appropriate and proportionate evidence is essential for producing a sound Local Plan, and paragraph 158 onwards of the National Planning Policy Framework sets out the types of evidence that may be required. This is not a prescriptive list; the evidence should be focused tightly on supporting and justifying the particular policies in the Local Plan. Evidence of cooperation and considering different options for meeting development needs will be key for this process.

The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively. It should also be kept up-to-date. For example when approaching submission, if key studies are already reliant on data that is a few years old, they should be updated to reflect the most recent information available (and, if necessary, the plan adjusted in the light of this information and the comments received at the publication stage)."

- 1.3 This paper is therefore a key part of addressing the above matters. In doing so, it helps to fulfils the requirements in section 19 (2) of the Planning and Compulsory Purchase Act 2004.
- 1.4 This paper does not represent the complete evidence base. The full evidence base comprises a wide range of documents which have been submitted alongside the Local Plan and Proposals Map, and this Paper should be read in conjunction with those documents. The list of evidence at submission stage is included at Appendix 1, and cross-references to the documents on that list are made throughout. The purpose of this paper is to both provide an overview of how procedural steps have been complied with, key facts and figures about Reading, and broadly set out how the evidence has led to the policies that are contained within the Local Plan.

Structure of the Paper

1.5 This paper is divided into three main sections. Section 2 sets out some of the key basic information that has influenced the Local Plan, and presents some overall facts and figures. Section 3 contains the procedural background, which seek to demonstrate that the Council's procedures have complied with a raft of regulations and guidance. Section 4 then goes on to summarise the background to each policy in the Local Plan, including reference to more detailed documents where appropriate.

2. KEY FACTS ABOUT READING

2.1 General

- 2.1.1 Reading is a primarily urban authority situated within the South East region and the former county of Berkshire. It is within the affluent M4 corridor, situated adjacent to the M4 motorway itself. It is also on the Great Western main rail line, and has good connections to Heathrow airport. It borders three other local authorities: Wokingham District Council, West Berkshire Council and South Oxfordshire District Council, as well as Oxfordshire County Council. The urban area centred on Reading extends beyond the Borough boundaries into West Berkshire and Wokingham.
- 2.1.2 These sections provide a brief overview of some of the key facts around Reading, affecting how the Local Plan has developed. It is not comprehensive, and there are many instances where more information needs to be presented to justify how specific issues are dealt with. These are shown in more detail in the relevant background evidence.

2.2 Living in Reading

- 2.2.1 The population of the Borough at the 2011 Census was 155,698, an increase of over 11,000 since the 2001 Census. The estimated population at 2016 was 162,700¹, indicating strong levels of population growth in recent years. However, as stated above, the urban area centred on Reading extends significantly beyond the Borough boundaries. There are various ways to define the extent of the urban area, which under some definitions could encompass the towns of Wokingham and Bracknell, but the Berkshire Structure Plan defined the 'contiguous built-up area centred on Reading' as being those settlements contiguous with Reading which are located north of the M4 motorway, and, although this document is now superseded, the definition is still accurate. The population of this area in the 2011 Census was estimated to be around 252,904². However, this is not exact, because it relies on ward boundaries which do not necessarily equate exactly to the above definition.
- 2.2.2 Table 2.1 sets out the key demographic characteristics of the Borough from the 2011 Census, and compares them to the South East and England and Wales figures. Although this information is now seven years old, there is no reason to believe that the key messages have changed. Compared to the South East and England and Wales, Reading is characterised by:
 - An extremely high population density, consistent with its primarily urban nature;
 - A high proportion of black and ethnic minority inhabitants;
 - A high percentage of single person households, although average household sizes are in line with elsewhere;
 - A high proportion of households living in flats;
 - Relatively low levels of owner occupation compared to the South East;
 - A high proportion of residents who travel to work by more sustainable modes;
 - A high proportion of well-qualified inhabitants, but with a significant slice of the population who have no qualifications; and
 - Relatively high proportion of households without car access compared to the

¹<u>www.nomisweb.co.uk</u>

² This is 155,698 in Reading Borough, 25,878 in West Berkshire (Calcot, Birch Copse, Purley and Westwood wards) and 71,328 in Wokingham (Bulmershe and Whitegates, Coronation, Hawkedon, Hillside, Loddon, Maiden Erleigh, Shinfield North, Sonning, South Lake and Winnersh wards)

South East

	Reading	South East	England and Wales
Population	155,698	8,634,750	56,075,912
Population Density (people per hectare)	38.5	4.5	3.7
People who are over 65 (%)	11.5	17.2	16.4
Population from black and ethnic minority groups (%)	25.2	14.0	9.3
Average household size	2.4	2.4	2.4
Single person households aged 16 to pensionable age (%)	21.1	16.1	17.8
Owner occupied households (%)	54.8	67.6	63.6
Households which live in flats or maisonettes (%)	30.5	20.3	20.7
Working age population who are economically active (%)	73.9	72.1	69.7
People who usually travel to work by foot or bicycle (%)	20.5	12.7	12.6
People who usually travel to work by public transport (%)	20.3	11.7	15.9
People who usually travel to work by car or van (%)	49.2	62.1	59.5
Households without a car or van (%)	28.3	18.6	25.6
People with no qualifications (%)	17.4	19.1	22.7
People with level 4 or 5 qualifications (%)	34.8	29.9	27.2
People with a limiting long-term health problem or disability (%)	12.9	15.7	17.9

Table 2.1: Key Demographic Characteristics of Reading at 2011 (Source: Census 2011)

- 2.2.3 Compared to the average for Great Britain and the South East, earnings of Reading residents are generally high. Reading residents in full-time work in 2017 had an average gross weekly pay of £604.7, compared to £596.8 for the South East and £552.7 for Great Britain³.
- 2.2.4 Unemployment is slightly lower than the GB average. It has been measured for July 2016-June 2017 (as a percentage of the economically active population) as being 3.8% for Reading Borough. This was slightly higher than the South East average (3.5%) and below the Great Britain average of 4.6%. In Berkshire, only Slough (4.4%) has a higher proportion, while neighbouring districts such as West Berkshire and Wokingham have figures below 3%⁴.
- 2.2.5 As for both Great Britain and the South East, unemployment has been falling. Unemployment levels in Reading are at the lowest level in the last ten years, having hit a high of 7.7% in 2010-11.
- 2.2.6 Despite the relatively high wages and low unemployment by national standards, Reading Borough contains some of the most deprived areas of the South East, including 10 super output areas (SOAs) in the 20% most deprived in England for the Index of Multiple Deprivation 2015⁵ (most of which are in South Reading, but also

³Source of all figures: NOMIS data – <u>www.nomisweb.co.uk</u>

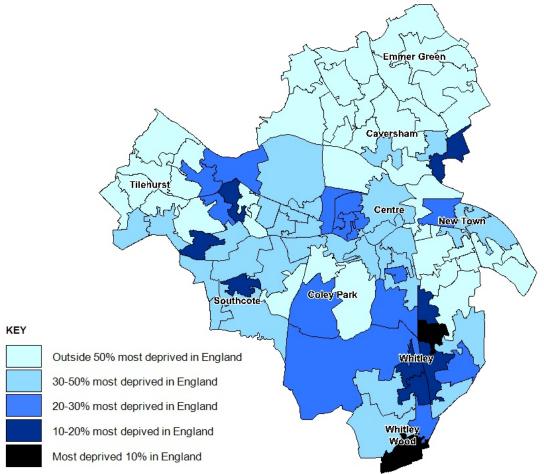
⁴ Source of all figures: NOMIS data – <u>www.nomisweb.co.uk</u>

⁵ Index of Multiple Deprivation provides an indication of levels of exclusion, based on a number of factors

Amersham Road, Usk Road, Dee Park and Coronation Square; refer to Figure 2.2). Of these, two (Swallowfield Drive and Staverton Road in South Reading) are in the 10% most deprived.

2.2.7 The indices of deprivation can also be broken down into their various components. Education, skills and training are a particular issue, and Reading contains three SOAs that are within the 5% most deprived in England (all in South Reading) and a further six SOAs that are within the 10% most deprived (including Amersham Road, Dee Park, Coronation Square and others in South Reading).

Figure 2.2: Rank of Index of Multiple Deprivation 2015 (out of 32,482 SOAs) Source: ONS, 2015



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- 2.2.8 Five SOAs (Dee Park, Usk Road and parts of Whitley) fall within the 10% most deprived wards in terms of income. Two SOAs (Swallowfield Drive and Staverton Road in South Reading) are in the 10% most deprived for employment. No Reading SOAs fall within the top 10% most deprived in terms of health and disability, whilst one (the area around Reading station) is within the 10% most deprived for barriers to housing and services.
- 2.2.9 Crime is one of the most significant issues for Reading, with six SOAs being within the 10% most deprived in England and Wales for crime and disorder. Generally, there is not a significant crossover with those SOAs identified as having other particular deprivation issues, as, although one of these SOAs is in South Reading, the remainder are in and around the town centre.

2.2.10 House prices in Reading are well above the national average. At April 2017, the Reading average house price was £299,037, compared to £234,950 for England. However, house prices are lower than the South East average, which was £314,456 in April 2017.

MONTH	Detached (£)	Semi- Detached (£)	Terraced (£)	Maisonette/ Flat (£)	All (£)
Apr-07	389,193	244,562	198,584	165,705	204,850
Apr-08	397,685	246,567	199,848	164,545	205,776
Apr-09	346,756	213,697	172,567	144,612	178,822
Apr-10	376,051	232,342	188,078	146,007	191,430
Apr-11	391,099	235,985	190,129	146,599	193,267
Apr-12	393,464	242,167	194,793	148,892	197,238
Apr-13	412,418	252,448	203,659	153,694	205,542
Apr-14	445,770	275,712	221,837	166,610	223,542
Apr-15	496,138	305,558	245,137	184,293	247,411
Apr-16	600,914	371,075	295,927	220,535	298,230
Apr-17	601,101	370,203	294,420	223,873	299,037

Table 2.3: Average House Prices in Reading Borough 2007 - 2017(Source: HM Land Registry, 2018)

- 2.2.11 Table 2.3 shows house price changes in Reading. Between 2007 and 2017, a 46% increase was shown. This is a higher increase than the South East, which was 39%, and England overall, where prices rose by 26% over the same period⁶. These high prices compared to the national average make it increasingly difficult for low wage earners, including key workers, whose labour is essential to the local economy, to find accommodation they can afford.
- 2.2.12 The story of the last ten years, as shown by Table 2.3, is of house prices falling significantly in 2009 as a result of the recession. Recovery thereafter was slow, and did not reach pre-recession levels until 2013. However, after recovery, house prices increased at a substantial rate between 2013 and 2017, with virtually all of the overall ten year increase occurring in that period. The increase has levelled off since 2016. It is worth noting that the degree to which prices were hit by, and then recovered from, the recession depends on the type of accommodation. Detached houses recovered strongly, and were back at pre-recession levels by 2011, whereas flats and maisonettes were much more vulnerable to recession effects and took until 2014 to reach pre-recession levels. This reflects the pattern that Reading has seen in terms of major town centre development of mainly flatted units, which almost completely stopped during the recession, and has only recently emerged strongly. This vulnerability of town centre flatted development to economic conditions is something that has wider implications for the Local Plan, given the reliance on such development.
- 2.2.13 It is also worth noting that, for each individual type of accommodation, Reading prices are also significantly higher than for the South East as a whole. Although the average house price for Reading at April 2017 was lower than for the South East, this is due to the comparatively large amount of small accommodation in Reading such as terraces and flats, rather than lower prices for comparable dwellings.

⁶ HM Land Registry 2018

2.2.14 Affordable housing is a key issue. The Berkshire Strategic Housing Market Assessment (EV011, 2016) sought to assess the annual need for affordable housing in each authority. For Reading, this figure was expected to be 406 affordable homes per annum. This figure is a very significant proportion of the total objectively assessed need for Reading of all types of housing (699), and indicates an overwhelming local need for affordable housing.

2.3 Working in Reading

- 2.3.1 In economic terms, the Thames Valley is one of the most buoyant areas in the UK, and is often seen as one of the key drivers of the national economy. Gross Value Added (GVA) measures the contribution to the economy, and is a key component in the calculation of gross decimal product (GDP). Gross Value Added per head is estimated at £38,918 in Berkshire for 2013, which, in terms of equivalent regions, is behind only West and East Inner London. Berkshire contributes 2% of the UK's entire GVA⁷.
- 2.3.2 The Thames Valley area has been highly successful in attracting key investment in sectors such as computing, research and development, business and financial services, telecommunications, pharmaceuticals and the automotive industry. Reading itself has seen a dramatic change in the structure of its economy over the past 25 years from its 'bulb, biscuits and beer' reputation to that of a compact service economy specialising in business services. It is now home to the largest concentration of ICT corporations in the UK. It is the service and financial centre of the Thames Valley region and beyond. It has a large number of business parks and industrial areas with several more just outside its boundaries in adjoining Districts.
- 2.3.3 In terms of employees working in Reading, the sectors which are particularly strongly represented include information and communication (14.6% of 2016 jobs compared to 6.2% in the South East and 4.2% in Great Britain), professional, scientific and technical activities (10.7% compared to 8.9% regionally and 8.6% nationally) and financial and insurance activities (4.4% compared to 2.9% regionally and 3.6% nationally). Reading has significantly lower representation of employment in manufacturing (1.9% compared to 6.3% regionally and 8.1% nationally), construction (2.2% compared to 5% regionally and 4.6% nationally) and education (5.8% compared to 10.2% regionally and 8.9% nationally). In the case of education, this may reflect the fact that many education establishments serving the urban area, including much of the University of Reading's main campus, are just outside the Borough boundaries.
- 2.3.4 This economic success has led to Reading being a net importer of labour. At 2016, there were approximately 103,000 employee jobs based in Reading, according to the ONS Business Register and Employment Survey, compared to an economically active population of around 90,000 in 2016. Much of this importing of labour comes from the parts of the Reading urban area outside the Borough boundaries, but many people commute substantially greater distances. This means increasing commuting distances, car use and pressure on the housing market. There is something of a polarisation of commuting patterns in Reading, with a higher proportion of workers with particularly short commutes (less than 5km) and particularly long commutes (over 40km) than the averages for both the South East and England and Wales.

⁷ ONS, 2017

2.3.5 Looking more specifically at the commuting relationship with various areas, the largest commuting flows into Reading are from West Berkshire and Wokingham, which is no doubt affected by the way that the urban area of Reading extends into those authorities. These are also the primary places that Reading residents commute to, but not to the same degree. There is a strong flow of commuters into London and a smaller flow of in-commuting from. The balance of in and out-commuting with South Oxfordshire is largely even. There is net out-commuting to Bracknell Forest, Windsor and Maidenhead and Slough, whilst there is net in-commuting from Basingstoke and Deane, Hart, Wycombe and Swindon.

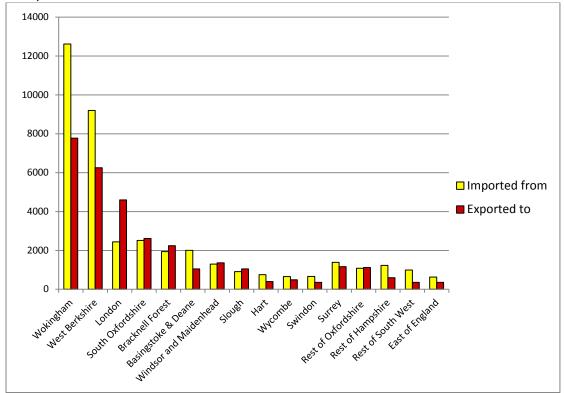


Figure 2.4: In-Commuting and Out-Commuting for Reading Borough (Source: Census 2011)

2.3.6 In the short term, economic growth in Reading is expected to remain strong. A report by Ernst and Young⁸ looks at the economic growth prospects of cities across the country, and this expects that Reading is expected to outperform other cities in the South in terms of GVA growth up to 2020, and in national terms will be rivalled only by Manchester. However, the report indicates that this will not necessarily translate into an equivalent growth in employment, due to the significant presence of high value-added industries.

2.4 Environment in Reading

2.4.1 Despite its urban character, Reading contains a relatively rich variety of natural landscapes and habitats, ranging from the major areas such the water meadow, to pockets of ridged woodland and grassland. Reading is situated on the edge of the Chilterns, at the confluence of the River Thames and River Kennet and the

⁸ EY UK Regional Economic Forecast, Winter 2017-18, Ernst and Young <u>https://eydigital.cld.bz/EY-UK-Regional-Economic-Forecast/1#zoom=z</u>

resultant landscape of river floodplains, wooded hill crests and valley bottoms have a prominent visual impact on the town.

- 2.4.2 Reading's waterways form unique corridors through the town centre and are of outstanding importance for recreation and the environment within the Borough. The River Thames lies to the north of the centre and is separated from the town centre by the railway line. Much of the banks of the Thames are accessible to the public with eight parks lying adjacent to the river. The centre lies on the River Kennet and the majority of the riverside is built up. In recent years the Kennet has been opened up in the centre following the redevelopment of the Courage Brewery site and it now runs through the centre of the Oracle development. The Holy Brook also runs through the town centre but much of it has been built over. However, glimpses can still be seen to the rear of Castle Street, Gun Street and Abbey Square. The Foudry Brook lies to the south of the town centre along the A33 relief road, adjacent to the Kennet Island development.
- 2.4.3 In addition to its waterways, Reading contains a number of green areas which are important for informal recreation and wildlife. Whilst the Borough has no wildlife sites of national or regional significance, it does have many sites that are important locally and at the county level and as such there are several Local Nature Reserves and Local Wildlife Sites. Trees and hedges are also an important part of the townscape, which has some substantial tree belt and ancient woodlands and hedgerows, some dating back to at least the 17th Century.
- 2.4.4 However, these features continue to experience pressure from development, both directly and indirectly. Reading, like so much of Berkshire and the South East of England in general, continues to experience considerable pressure for development of land within urban uses, in line with government policy to protect the wider countryside. Existing habitats, which have evolved on remnants of land that have not been developed, have become further fragmented and the population of many species has become more isolated. Despite this, there is a reasonable diversity of wildlife in Reading that continues to represent the characteristics of the natural areas where it is found. However many are in very small populations and are in scattered locations across Reading.
- 2.4.5 In terms of potential of greenfield land for development, much of the undeveloped land that does exist in the Borough is heavily constrained. One of the key constraints is the likelihood of flooding. Figure 2.5 shows that the larger open spaces are generally within Flood Zone 3 (as defined in the Strategic Flood Risk Assessment, EV025), defined as being of high risk of flooding. Many of the other larger areas are covered by other definitions, e.g. biodiversity designations and historic park and gardens.

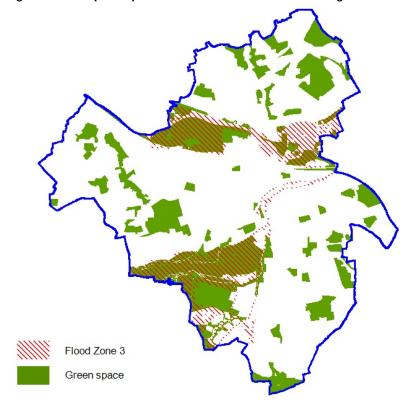


Figure 2.5: Open Space and Flood Risk in Reading

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- 2.4.6 Reading's built environment reflects its social, political and economic history. Reading contains examples of buildings of most historical periods from the medieval Abbey ruins to the present day and is well known for its Victorian buildings and supporting brick and tile making industries. The local style is recognised to be patterned red, grey and cream brickwork with red tiles and decorative terracotta features. Some more recent developments, particularly those built in the 1960s and 70s are not as attractive and contribute less to the character of the town centre. They tend to reflect an era dominated by growth in car use.
- 2.4.7 There are over 800 listed buildings in Reading, two scheduled ancient monuments, five historic parks and gardens and fifteen Conservation Areas. These vary in character from Victorian suburbs at The Mount to village centres at Horncastle and St Peter's, and formal Georgian/Regency townscape at Eldon Square.

2.5 Development in Reading

- 2.5.1 A great deal of development has taken place over recent years in Reading. Table B8 sets out the net completions for each use class in the ten-year period from 2007 to 2017 in square metres, or in number of dwellings for housing.
- 2.5.2 There has been significant growth in housing over this period, but growth has not been as consistent as in the preceding ten years, largely due to the recession affecting housebuilding rates between 2010 and 2014. There has been an overall reduction in retail (A1), although it should be noted that most of this resulted from the demolition of retail space at Station Hill last year in advance of redevelopment. There has also been a very significant reduction in offices across

the ten year period, including but not wholly as a result of permitted development rights to change offices to housing. There has also been a significant reduction in general industrial space (B2), but an increase of storage and distribution (B8). There has been more limited, but also more consistent, growth in hotels (C1), non-residential institutions (D1) (in most cases education) and sui generis uses.

	2007-2008	2008-2009	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	Total
A1	7,825	3,733	-2,501	2,771	84	-1,721	-2,055	218	-1,210	-15,141	-7,997
A2	560	-125	1,274	-208	0	1,378	-595	-455	-693	-48	1,088
A3	616	1,384	-57	644	120	1,138	83	-8	1,077	359	5,356
A4	-411	0	44	-755	-295	-349	40	-358	0	-395	-2,479
A5	81	0	300	0	0	0	0	0	0	187	568
B1	-14,207	-3,678	53,807	-44,050	-13,690	-11,035	-4,918	-55,748	-23,137	-18,869	-135,525
B2	0	1,412	-6,056	562	-59,612	1,170	-14,738	-122	-300	5,493	-72,191
B8	-14,123	-3,595	2,632	3,853	-916	84,567	6,408	1,445	172	-62	80,381
C1	7,794	23,956	-250	0	312	420	3,828	-128	1,689	0	37,621
C2	2,029	1,412	388	4,057	4,436	8,550	-2,901	-830	-7,668	-1,285	8,188
D1	14,297	3,607	13,031	778	9,228	4,974	8,304	253	-9,482	6,986	51,976
D2	1,019	3,586	-213	1,230	3,436	2,223	3,484	-1,771	2,654	722	16,370
SG	1,898	13,445	2,931	484	-3,431	-738	9,982	17,236	15,984	-6,989	50,802
Total	7,378	45,137	65,330	-30,634	-60,328	90,577	6,922	-40,268	-20,914	-29,042	34,158
Dwellings	837	782	693	321	312	474	361	635	751	717	5,883

Table 2.6: Net Completions in Reading 2007-2017 (Source: JSPU/RBC)

2.5.3 Some of the more significant developments and ongoing schemes in the Borough over this period have included: -

- A £900million investment in a new railway station with new platforms, overbridge and underpass, public transport interchange and open spaces at northern and southern entrances;
- Kennet Island the former sewage works is being redeveloped for a new residential community;
- Battle Hospital redevelopment of the former hospital for housing and retail, including a superstore;
- Dee Park regeneration and revitalisation of an outdated and poorly designed housing estate, including a significant increase in new dwellings;
- Green Park Village development of over 800 homes now under construction adjacent to the Green Park business park in south Reading, due to include a primary school and railway station;
- A very large Tesco distribution warehouse on the site of the former Berkshire Brewery;
- Chatham Street a development featuring residential and new multi-storey car park on the western edge of central Reading;
- New office schemes in the town centre, in particular three buildings at Forbury Place;

• Four new tall buildings have been developed in central Reading in the last ten years - The Blade, Three Forbury Square, phase 2 of Chatham Place and a new residential building under construction at 120 Kings Road.

2.6 Getting About in Reading

- 2.6.1 Reading is in a unique location situated along the M4 corridor with excellent infrastructure links and in close proximity to major transport nodes allowing easy access to national, European and international destinations. Heathrow airport and London lie within a 40 minute drive of Reading. Over 17 million people arrive at or depart from Reading station every year. It is the second biggest interchange station on the UK rail network outside of London and offers direct services to 360 towns and cities nationally. Reading Buses carry over 21 million customer journeys a year. Reading's prominence as a commercial location and major transport hub in the Thames Valley places considerable and increasing pressure on its transport infrastructure. Public transport, both road and rail, is well used, but high levels of private car use contribute significantly to congestion and pollution, particularly in peak travel periods.
- 2.6.2 The final phase of Reading Station upgrade is underway to remove the bottleneck at Cow Lane that will allow two-way traffic flows and provide improved pedestrian and cycle facilities. Once complete, the improvements will also remove through traffic from the Oxford Road corridor and increase capacity and reliability of rail services operating on the Great Western Mainline. Major brownfield development sites north and south of the station will be developed to provide a new high-quality mixed-use extension to the centre. This will be an extremely significant boost for Reading, and will help ensure Reading continues its past economic success.
- 2.6.3 Other major transport schemes which are underway or being developed include the construction of bus priority measures along the A33 corridor connecting the town centre to Mereoak Park and Ride via major developments along the strategic corridor, a new railway station at Green Park, a Mass Rapid Transit route connecting Reading Station to Thames Valley Business Park and a new National Cycle Network route connecting Newbury to Ascot via Reading and Wokingham. All of these schemes are vital to the continued growth and economic success of Reading as the heart of the Thames Valley.

2.7 Key Messages

- 2.7.1 There are a number of key messages to be drawn from the preceding sections. These include the following:
 - The constrained boundary of the Borough means that much of the area is likely to see continued development, and that there is little opportunity to develop greenfield land;
 - Despite the relative affluence of the Borough, there are significant pockets of deprivation, particularly in South Reading and parts of West Reading;
 - Reading is the main settlement in one of the main drivers of the national economy;
 - Reading has been hit by the recession, but there is good reason to believe that it will retain its status as one of the most economically successful areas;

- There is a strong need for additional housing, particularly affordable housing;
- Significant recent development has taken place in Reading, but much of the residential development has come at the expense of office;
- Low levels of car ownership mean that access to services in smaller centres by alternative modes of travel is crucial;
- There is a good level of public transport use, particularly to and from the centre, and significant proposed improvements which could make areas accessible for future development.

3. PROCEDURAL BACKGROUND

3.1 Introduction

- 3.1.1 There are a number of requirements in producing a Local Plan, relating to the NPPF, the tests of soundness or legal requirements. Most of these are an integral part of producing a planning document in any case, but, in some cases, there is a need to demonstrate how these requirements have been met. This section therefore outlines some of the key elements of the procedure in drawing up the Local Plan and the Proposals Map, at all stages of production.
- 3.1.2 Broadly, this section deals with three main aspects. Firstly, it looks at key issues in how the Local Plan and Proposals Map have been prepared, including looking at the Local Development Scheme (PP001), Statement of Community Involvement (PP002) and sustainability appraisal. Secondly it examines the internal consistency of the documents, and their conformity and consistency with other layers of planning policy and with strategies applying in other areas. Finally it highlights existing policy which will be replaced by the Local Plan.
- 3.1.3 The Council has also completed the Soundness Self-Assessment Toolkit (EV004) and the Legal Compliance Checklist (EV003) provided by the Planning Advisory Service. A Duty to Co-operate Statement (EV001) has also been prepared. These documents help to demonstrate compliance with procedural requirements, and this section should be read in conjunction with those documents.
- 3.1.3 This section sees the Local Plan and the Proposals Map as being essentially the same document, as the Proposals Map is merely the spatial representation of the policies in the plan (along with factual information and adopted policy). Therefore, in most cases, they are examined together.

3.2 How the Local Plan has been developed

- 3.2.1 The broad timetable for how the Local Plan and Proposals Map have been developed is set out in section 3.3 in relation to the Local Development Scheme. In summary, the initial decision to produce a new Local Plan to replace all existing Development Plan Documents was taken in the July 2013 Local Development Scheme.
- 3.2.2 The production of the documents has followed the process set out in the Town and Country Planning (Local Planning) (England) Regulations 2012.

Overall Process

- 3.2.3 The broad timetable for how the Local Plan and Proposals Map have been developed is set out in section 3.3 in relation to the Local Development Scheme.
- 3.2.4 The need for a review of the existing development plan documents in Reading arose largely from the introduction of the NPPF in 2012 (OP001). Although much of Reading's existing development plan policy conformed generally with the content of the NPPF, there were particular issues in terms of objectively assessed needs, particularly for housing. As this was such a central matter, it was determined that a new comprehensive Local Plan was required. Other matters that led to this conclusion included the need to take account of the removal of some restrictions on changes of use, and the anticipated introduction of the Community

Infrastructure Levy. A new Local Development Scheme was put in place in July 2013 that announced the intention to produce a single Local Plan.

- 3.2.5 The first formal stage was to undertake a call for sites, which took place in January 2014. A number of sites were put forward, although some were already allocated within an existing development plan document. As the anticipated production of the Issues and Options was pushed back somewhat, mainly to allow the Berkshire Strategic Housing Market Assessment (EV011) to feed into it, there was felt to be a need to undertake another round of the call for sites in September 2015.
- 3.2.6 The first consultation stage was consultation on Issues and Options (LP013), which took place under Regulation 18 between January and March 2016. This looked at some of the key questions such as how much housing should be provided (informed by emerging conclusions from the SHMA), what types of areas should be looked at, and how housing and employment should be balanced. It also suggested broadly carrying forward the overall policy approach of a number of existing policies, broadly those with general development management principles. This also consulted on every site that had been submitted through the call for sites, and every existing unimplemented development allocation. A summary of the consultation and the representations received is set out in the Statement of Consultation on Issues and Options (LP015).
- 3.2.7 Rather than proceed directly to a consultation under Regulation 19, the Council decided to produce a full Draft Local Plan (LP009) and Proposals Map (LP010) under Regulation 18. This Draft Local Plan was consulted on during May and June 2017. This was somewhat delayed from the original timetable, mainly because the four authorities in the Western Berkshire Housing Market Area were co-operating on a Spatial Planning Framework, and it was felt to be important to show that unmet needs from Reading would be capable of being accommodated. A summary of the consultation and the representations received is set out in the Statement of Consultation on the Draft Local Plan (LP012).
- 3.2.8 The final consultation stage was a Pre-Submission Draft Local Plan (LP003) and Proposals Map (LP004), in accordance with Regulation 19. This was subject to consultation between November 2017 and January 2018, and the consultation period was lengthened to eight weeks to account for being held over Christmas. Much of this draft was the same as the Draft Local Plan. However, there were four additional policies, specifically EN17: Noise-Generating Equipment, H4: Build to Rent Schemes, CR16: Areas to the North of Friar Street and East of Station Road and WR4: Potential Traveller Transit Site at Cow Lane. In addition, there were a number of changes to existing policies, and the extension of the boundary of site CR11i: Napier Court. A summary of the consultation and the representations received is set out in the Statement of Consultation on the Pre-Submission Draft Local Plan (LP006).
- 3.2.9 After the close of the consultation on the Pre-Submission Draft Local Plan, the need for any changes was considered. It was decided that only minor wording changes, corrections and clarifications were required, which meant that the plan could proceed directly to submission under Regulation 22. A Schedule of Minor Changes before submission (LP008) is included in the evidence base. The Local Plan and Proposals Map were submitted on 29th March 2018.

Proposals Map

3.2.10 The Proposals Map presents designations from the Local Plan. Alongside this,

important contextual information is also presented. Versions of the Proposals Map were subject to consultation alongside the Draft Local Plan (LP009) and the Pre-Submission Draft Local Plan (LP004). A Submission Draft Proposals Map (LP002) has been submitted alongside the Local Plan. It would replace the adopted Proposals Map from October 2012 (PP007).

- 3.2.11 In terms of content, Regulation 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012 specify that a policies map must:
 - (a) be reproduced from, or be based on, an Ordnance Survey map;
 - (b) include an explanation of any symbol or notation which it uses; and
 - (c) illustrate geographically the application of the policies in the adopted development plan.
- 3.2.12 Formerly, there was quite detailed guidance on what such a map should contain, but this is now not part of the NPPF or Planning Practice Guidance. Any policies with a spatial definition are shown on the Proposals Map, in line with the Regulations, but there are also other contextual matters that used to be specified under old guidance, and which it continues to make sense to show:
 - areas of protection, such as nationally protected landscape and internationally, nationally and locally-designated areas and sites; since Reading is a primarily urban Borough, there are few nationally or internationally designated areas to show. However, scheduled ancient monuments and historic parks and gardens are national designations, and are therefore shown. In addition, Local Wildlife Sites and Local Nature Reserves are designated locally and recognised by Natural England, so are shown (as part of the Green Network);
 - areas at risk from flooding; This has been a difficult designation to show on what is a very busy Proposals Map. Flood areas cover huge swathes of land, and often coincide with other designations. It is very difficult to show it without it being a solid fill, and this would dominate the whole map. Our solution to this issue is to show only the boundary of the area at risk of fluvial flooding (i.e. Flood Zone 2) on the main map. More detail is available in the Strategic Flood Risk Assessment (EV025);
 - minerals and waste matters; No minerals and waste DPDs have yet been adopted covering Reading Borough. However, there remain saved policies from the Minerals and Waste Local Plans, which allocate three sites in Reading. However, the Council considers that it is not necessary to show these allocations on the map as they are some way out of date. Work on new minerals and waste plan making is underway in conjunction with Wokingham, Bracknell Forest and Windsor and Maidenhead. Showing these out-of-date allocations would unnecessarily clutter the map and would result in confusion.
 - the geographical area covered by any inset maps; there are 19 inset maps on the Proposals Map, which are the designated centres.
- 3.2.13 In addition to this, it is necessary to show certain information in order to successfully apply the policies in the SDPD. For instance, there is much reference to the Air Quality Management Area, and it is therefore essential that this information is shown.

Translating Needs into Development Provision

- 3.2.14 The main development needs were set out in the Berkshire (with South Bucks) Strategic Housing Market Assessment 2016 (EV011, for housing, including affordable housing, and residential care), the Central Berkshire Economic Development Needs Assessment 2016 (EV009, for office and industrial and warehouse needs) and the Western Berkshire Retail and Leisure Study 2017 (EV020, for retail and leisure needs). A Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment (EV016, September 2017) also examined gypsy and traveller accommodation needs.
- 3.2.15 The main tool for translating these development needs into a figure to be provided within the Local Plan is the Housing and Economic Land Availability Assessment (HELAA, EV014 and EV015). Various iterations of the HELAA have been produced, but the version that has guided the overall development figures in the Submission Local Plan was that published in November 2017. The HELAA operated in tandem with the Sequential and Exceptions Test (EV028). These tests were meshed in with the HELAA methodology, but are presented separately to demonstrate compliance with national policy.
- 3.2.16 The HELAA was based on a methodology jointly agreed by five of the six Berkshire unitary authorities (as well as Reading, this comprised West Berkshire, Wokingham, Windsor and Maidenhead and Slough). Bracknell Forest had already begun work on their own assessment at this stage and did not therefore sign up, although they were included in discussions as it was developed. This methodology was subject to consultation with neighbouring authorities and key bodies such as the Environment Agency, Natural England, Historic England and Highways England. The methodology was finalised in November 2016 (EV013).
- 3.2.17 The full description of the HELAA process is set out in the HELAA report itself, together with the full set of tables for all sites. As well as providing the main evidence base for the overall capacity of the Borough, it also provides the main evidence base for the individual sites. Where a site in the HELAA was identified as contributing towards meeting the identified development needs and did not already have planning permission, or a resolution to grant permission, for that use, it was generally brought into the Local Plan as a development allocation.
- 3.2.18 The HELAA did not identify sufficient land to fully meet the needs for housing, industrial and warehouse or retail. However, in part, this is because the HELAA process, whilst it had examined the potential for housing intensification, had not focused on intensification of employment areas for industrial and warehousing, nor had it allowed for the flexibility of the town centre retail sites to accommodate additional retail should the market support this. The Employment Area Analysis (EV010, March 2018) demonstrates that there is scope within the Core Employment Areas for intensification of industrial and warehousing to make up the shortfall. This Local Plan Background Paper also demonstrates that there is flexibility on town centre retail sites to accommodate additional retail if there should be demand.

3.2.19 The main unmet need emerging from the HELAA was therefore for housing. The approach to this has been to engage under the duty to co-operate. This led to the signing of a Memorandum of Understanding covering the Western Berkshire HMA to address issues of unmet needs. This is covered in more detail in the Duty to Co-operate Statement (EV001) and in section 4.32 of this report.

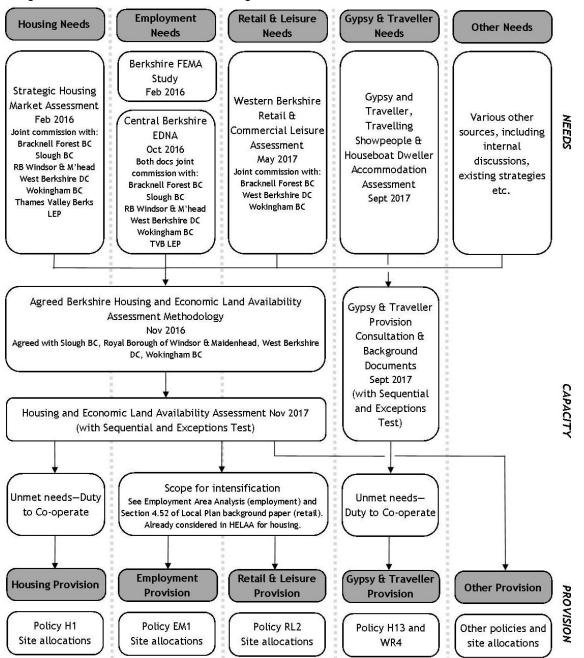


Figure 3.1: Process for Translating Needs into Provision

3.2.20 The process for considering gypsy and traveller needs was slightly different. The scope for accommodating these needs was considered, including in particular looking at Council-owned sites, and is set out in the Gypsy and Traveller Provision Background Paper (EV019). Whilst a potential site to meet transit needs was identified, it was concluded that it was not possible to meet permanent needs within the Borough. This again led to a need to engage under the duty to co-operate, and this is covered in more detail in the Duty to Co-operate Statement

(EV001) and in section 4.44 of this report.

3.2.21 Figure 3.1 sets out a summary of the broad process of how needs have been translated into the provision figures in the Local Plan. This is of course a simplified summary, and a variety of other factors came into play. The key considerations are set out in Section 4 of this paper in relation to each individual policy.

3.3 Compliance with the Local Development Scheme

- 3.3.1 Section 19(1) of the Planning and Compulsory Purchase Act 2004 states that Local Development Documents must be prepared in accordance with the local development scheme (LDS). This section demonstrates that this requirement has been fulfilled for the Local Plan and Proposals Map.
- 3.3.2 The LDS sets out the intentions for the role and scope of the Local Plan, key milestones and the resources required to prepare it. The last version of the Local Development Scheme (LDS) that was published was the November 2016 LDS (PP001). However, the intention to produce a new comprehensive Local Plan for Reading, including a proposals map, to replace the Core Strategy (PP004), Reading Central Area Action Plan (PP005) and Sites and Detailed Policies Document (PP006) was initially set out in the LDS published in July 2013. Subsequent versions of the LDS were published in November 2013, November 2014, April 2016 and November 2016.

Milestones

3.3.3 The milestones in the LDS for the production of the Local Plan (and accompanying Proposals Map) have been amended in the LDS each year. The table 3.2 below shows the milestone dates.

	July 2013	Nov 2013	Nov 2014	April 2016	Nov 2016	Actual
Issues and	Jul/Aug	Jul/Aug	September	January	January	January
Options	2014	2014	2015	2016	2016	2016
Draft	Jul/Aug 2015	Jul/Aug 2015	August 2016	January 2017	April 2017	May 2017
Pre-	Nov/Dec	Nov/Dec	Nov/Dec	Aug/Sep	November	November
Submission	2015	2015	2016	2017	2017	2017
Submission	February 2016	February 2016	January 2017	December 2017	February 2018	March 2018
Adoption	November 2016	November 2016	October 2017	September 2018	January 2019	-

Table 3.2: Progress against milestones in the LDS.

* Figure was already in the past at the time of drafting the LDS

- 3.3.4 The table above shows that the milestones have gradually been pushed back in successive versions of the LDS, as work progressed. The biggest issue in terms of meeting dates in the LDS was with the first stage, Issues and Options. This was around four months later than specified in the most up to date LDS at the time. Later dates broadly accorded with the milestones set out in the most up-to-date LDS, with no slippages of over a month.
- 3.3.5 The main reason for delays in the timetable were to enable joint work with neighbouring authorities under the duty to co-operate. Initially, this was to enable the production of a joint Berkshire-wide Strategic Housing Market Assessment (EV011). It took some time for all authorities to agree the principle of undertaking

a joint SHMA, and then production of the SHMA itself also took over a year. This study was, however, critical to the whole plan process, and the Local Plan could not have satisfactorily proceeded without it.

- 3.3.6 The other piece of joint working that delayed the plan was the work that led to the West of Berkshire Spatial Planning Framework (OP004). As it became clear that there would be unmet housing need from Reading, there needed to be some kind of agreed framework within which this could be considered. The production of a Draft Local Plan was pushed back to enable this to be completed.
- 3.3.7 The Annual Monitoring Report December 2016 recorded the commencement of the Local Plan, and accompanying proposals map.

Scope

3.3.8 In the July 2013 LDS, the Council set out the scope of the Local Plan. It defined the geographic coverage as being the whole Borough, and set out the broad coverage as being:

"Vision and key objectives; spatial strategy; overall development needs including for housing, employment, retail and leisure, community uses and infrastructure; development management policies, including design, sustainable design, local requirements for infrastructure and affordable housing, amenity etc; site allocations to meet development needs; designation of land for protection or other policy designations; implementation and monitoring framework."

3.3.9 The above broadly form the content of the Local Plan as submitted. In addition, the LDS noted the potential for the Local Plan to include minerals and waste policies, but the subsequent decision to proceed with a joint Minerals and Waste Local Plan with Wokingham Borough Council, Bracknell Forest Borough Council and the Royal Borough of Windsor and Maidenhead meant that the Local Plan does not address these topics.

Conclusion

3.3.10 The scope of the Local Plan (and accompanying Proposals Map) are in accordance with the Council's Local Development Scheme. In terms of timescales, whilst there were initial delays to allow joint working under the duty to co-operate to run its course, the milestones are generally in line with the most recent version of the LDS. The documents therefore comply with the LDS as far as is possible given the context.

3.4 Compliance with the Statement of Community Involvement

- 3.4.1 Section 19(3) of the Planning and Compulsory Purchase Act 2004 states that, in preparing a Local Development Document, a local authority should comply with their Statement of Community Involvement (SCI). This section fulfils the need for a statement of compliance, detailing how the local planning authority has complied with the SCI.
- 3.4.2 The Council has produced a Statement of Community Involvement (SCI), which was adopted in March 2014 (PP002). The SCI forms the basis for carrying out consultations on planning policy documents and guiding developers in undertaking pre-application consultation.

- 3.4.3 Community involvement on Issues and Options for the Local Plan (LP013) commenced in January, February and March 2016. Consultation on the Draft Local Plan (LP009) started in May 2017, and on the Pre-Submission Draft Local Plan (LP003) in November 2017. All consultation phases were therefore undertaken after the adoption of the SCI, and were therefore carried out in line with it.
- 3.4.4 The SCI is based around seven key principles. Figure 3.3 below shows how the Council has complied with these eight principles.

SCI guidance	Compliance with guidance
Accessibility and Choice	
The Council will maintain a list of individuals, groups and organisations that have expressed an interest in being involved in consultations on planning matters, and will consult them on all relevant planning matters.	A list has been maintained and consultation on all stages of the Local Plan was sent to the entire list.
Measures to involve and consult the community will be appropriate to the type, scope and stage of the policy or plan, and to the community itself.	Measures were appropriate to the stage of the plan, with the widest community involvement being held at the earliest stages as set out in the SCI.
The Council will clearly state the methods for responding, and the timescales, at the beginning of the process. This will be on the website, and any consultation material, letters and e-mails produced.	The methods and timescales for responding were clearly placed on the website and on consultation material at each stage.
The Council is emphasising the importance of working at a neighbourhood level. In consulting on planning documents, the Council will use existing neighbourhood networks and structures to consult and involve, where those networks and structures are representative of the neighbourhood, and this may mean a differing approach in different neighbourhoods.	The Council has tapped into existing neighbourhood networks to assist in engaging on stages of the Local Plan, for instance groups such as Tilehurst GLOBE and the groups that make up the Conservation Area Advisory Committee.
The materials, documents and methods of community involvement will be designed to maximise accessibility insofar as is possible.	Materials and documents were designed to balance ease of understanding with the need to communicate some quite complex issues. Consultation events were held in different locations at different times to broaden their accessibility.
Timeliness	
Community involvement on policies and proposals will be front-loaded. This means that the most wide-ranging and open involvement will take place at the earliest stage, when the opportunity to shape the outcome is greatest. As policies and proposals develop further, consultations should become more focussed and seek views on more detailed matters.	The widest community involvement took place at Issues and Options stage, where the opportunity to shape the outcome was greatest. This included four interactive workshops (three for the community, one for businesses) at different locations, a questionnaire, drop-in events etc. The focus of consultation events narrowed at later stages.
Any community involvement stage for a planning policy document will last for a minimum of six weeks.	All consultation stages were at least six weeks.
The Council will avoid consulting over Christmas and New Year insofar as is possible. Where consultations over these periods are inevitable, consultation periods will be extended to take account of this. Where consultation is necessary in other holiday periods, consideration will also be	Consultation on the Pre-Submission Draft Local Plan took place over Christmas 2017. The consultation period was therefore extended to eight weeks.

Figure	2 2.	Comp	liance	with	the	SCI	Princi	nles
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given to extending deadlines.	
Events designed to publicise the community involvement (e.g. public exhibitions) will be held at a time within the community involvement period which allows time for responses afterwards, e.g. not within the last ten days before the period closes.	Public exhibitions were generally held reasonably early in the process. No events took place within the last ten days of the consultation period, at any stage.
Inclusiveness and Equity	
All groups will have equal opportunities to get involved in the process, and this will include the selection of venues and timing of events.	Events were timetabled to try to maximise access for all, and venues were generally accessible.
Whilst enabling all groups to be involved in the process, the Council will make particular efforts to reach groups that have typically been difficult to involve in past planning policy consultation exercises in Reading. These include: Younger people (under 40); Black and minority ethnic populations; and Residents of less affluent communities, including much of South Reading and parts of West and Central Reading	There has continued to be a difficulty in reaching the communities identified in the SCI. Although the age and ethnicity of respondents has not been recorded, the location of residents has tended to reflect past consultations, with greater numbers of responses from the west and north. The job has been made more difficult with the removal or weakening of some of the bodies that had previously been used, e.g. Council forums and the Sakoma group, representing ethnic minority groups. However, the Reading 2050 project, which specifically targeted involvement from young people, has helped to influence the plan.
Transparency and Honesty	
Where background evidence is vital to an understanding of the decisions to be made, this will be made available on the Council's website and on request, and will be highlighted within the consultation documents themselves.	The Council has sought to publish the main pieces of background evidence wherever available during consultation processes, and indeed delayed the production of the Local Plan until the SHMA became available. This has not been achieved across the board as resource constraints have made it difficult to progress a significant number of documents at the same time, but those documents that affect key matters such as the scale and distribution of development have been published earlier in the process.
The Council will highlight any significant constraints that prevent the pursuit of certain options, and will not consult on options that are not realistic or achievable.	The publication documents have highlighted constraints on these matters where they exist. For instance, spatial options around housing numbers sought to make clear the implications of certain development levels for e.g. employment areas and undeveloped land.
Respect and Listening	
All responses received in writing within the specified consultation period will be taken into account.	The Council has taken all responses received during the consultation period into account, and the Statements of Consultation set out how each point has been considered.
When publishing consultation results, the Council will publish only the name of the respondent and no other personal details.	Only names have been published when reporting responses, and no other personal details.
Accountability	
In reporting on the community involvement, the Council will respond to each individual point made, stating what action, if any, the Council will be taking to address the point. Where the number of responses is reasonably low, for example under 50, this may be done individually for each respondent.	The Council has taken all responses received during the consultation period into account, and the Statements of Consultation set out how each individual point has been considered.

 However, where a significant number of responses have been received, where the same point has been made by a number of different respondents, these may be grouped together with a single Council response. A report of consultation will be published which summarises the consultation undertaken, and summarises the representations received and the Council response to those representations. This will be published at the next stage of the document at the latest and will be available on the website and in hard copy in Reading Borough libraries and the Civic Offices. 	A statement of consultation has been published covering each consultation stage, summarising the methods and responses, and containing a schedule of the individual points made and the Council responses. These have been published at the latest at the time of the next consultation, although the Statement of Consultation on Issues and Options was published earlier.
The Council will contact anyone who made representations on planning policy to notify them of the next stage of that policy production. In doing so, the Council will highlight the availability of the report of consultation.	All respondents have been added to the consultation list and have therefore been notified of the next consultation stage.
Flexibility and Evolution	
The Council will welcome any comments on the community involvement processes used, and will take account of them in future exercises, and will ask for feedback on specific events, e.g. workshops and exhibitions.	There have been some comments on the processes, and these have been taken into account where possible and reasonable.
Lessons learned from individual community involvement stages will be reported on in the Report of Consultation, and will be taken into account in future exercises.	The Statements of Consultation include an evaluation section which picks up on lessons learned from the consultation exercises.

- 3.4.5 Statements of Consultation have been published which describe in more depth the actions taken at each stage of consultation, and demonstrate how the exercises have complied with the SCI (LP006, LP012 and LP015).
- 3.4.6 Therefore, the Local Plan, together with the Proposals Map, comply with the Council's Statement of Community Involvement, and meet this legal requirement in the Planning and Compulsory Purchase Act 2004.

3.5 Sustainability Appraisal of the Local Plan

- 3.5.1 It is a requirement under European Union Directive 2001/42/EC (incorporated into English law by the Strategic Environmental Assessment Regulations 2004) for Strategic Environmental Assessment to be carried out for plans and policies. In the local plan-making system, this has been turned into a broader requirement for Sustainability Appraisal. Section 19(5) of the Planning and Compulsory Purchase Act 2004 states that the local planning authority should carry out an appraisal of the sustainability of the proposals in each document, and prepare a report of the findings of the appraisal.
- 3.5.2 Each stage of the Local Plan and accompanying Proposals Map was accompanied by a Sustainability Appraisal report, which utilised the framework and sustainability objectives set out in the Sustainability Appraisal Scoping Report. The Scoping Report was published in September 2014 (PP003) in order to inform the

development of the Local Plan, and is available on the Council's website⁹. These reports were drawn up in a way that informed the production of the respective stage of the document. Therefore, the following reports have been published:

- Sustainability Appraisal of the Local Plan Issues and Options, January 2016 (LP014);
- Sustainability Appraisal of the Draft Local Plan, May 2017 (LP011); and
- Sustainability Appraisal of Pre-Submission Draft Local Plan, November 2017 (LP005).
- 3.5.3 The Sustainability Appraisal process has also incorporated the requirement to undertake two other more detailed, screening level assessments: Habitat Regulations Assessment and Equality Impact Assessment.
- 3.5.4 Article 6 of the Habitats Directive 92/43/EEC deals with the management of Natura 2000 sites, which includes Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Where land use plans may have a significant effect on a Natura 2000 site, plans are subject to Habitat Regulations Assessment, in accordance with statutory requirements. The screening level assessment was undertaken in appraising objective 8, and each report sets out more detail in appendices of how this has been considered.
- 3.5.5 Equality Impact Assessment looks at how a policy or function will affect people from different groups and in turn whether it has a negative impact on groups or individuals in particular with regard to race, gender, disability, sexual orientation, age or religious belief. The screening level assessment was undertaken in appraising objective 16, and each report sets out more detail in appendices of how this has been considered.
- 3.5.6 This section briefly summarises the scope of each Sustainability Appraisal, and highlights key results.

Sustainability Appraisal of the Local Plan Issues and Options, January 2016 (LP014)

- 3.5.7 This stage of the Sustainability Appraisal primarily looked at the various options that were set out in the Issues and Options report, and compared the effects against the identified sustainability objectives. It looked particularly at overall development levels for housing and employment, and at some of the options for housing standards that had been set out.
- 3.5.8 The document also appraised each site which had been suggested, as well as sites proposed to be carried forward from existing development plans. A range of options for each site were tested, and these included whatever option had been suggested through a call for sites exercise.
- 3.5.9 At this stage, as no strategy had been determined, it is not possible to generalise about the effects of the document. There were a wide range of very different options for sites and policies, with very different sustainability effects.

⁹ <u>http://www.reading.gov.uk/media/1052/Sustainability-Appraisal-Scoping-Report-Revised-September-</u> 2014/pdf/Sustainability-Appraisal-Scoping-Report-Sep14.pdf

Sustainability Appraisal of the Draft Local Plan, May 2017 (LP011)

- 3.5.10 This document was a Sustainability Appraisal of the policies and sites set out in the Draft Local Plan. It took each option for a policy or site, in turn, and examined it against the environmental, social and economic objectives.
- 3.5.11 As this was the first stage with draft policies in place, the appraisal covered a wider range of matters than the Sustainability Appraisal of the Issues and Options, and was therefore more extensive and in-depth, and gave an overall impression of the likely effects.
- 3.5.12 The proposed development management policies showed overwhelmingly positive sustainability effects, for instance making the best use of previously-developed land, improving the environment and providing much needed housing.
- 3.5.13 For all development options, there were some environmental costs, such as carbon dioxide emissions, energy use and waste generation. Mitigation of effects is a constant feature and can be partially achieved through compliance with other policies. Certain potentially negative effects requiring mitigation regularly appeared. These include the following:
 - Air quality issues: The Air Quality Management Area is extensive and covers the most accessible parts of the Borough. There will clearly be a need to consider measures to mitigate the effects on residents from the local air quality, and on the quality of the air from additional traffic;
 - Other pollution effects: sites which may be subject to noise or have potential contamination will require mitigation measures;
 - Education and healthcare infrastructure: certain areas of the Borough are under pressure in terms of education and healthcare capacity. This is an issue which has been considered in drawing up the Local Plan;
 - Flood risk: allocations must consider the extent to which new development in the floodplain puts potential residents at risk, and affects flood risk elsewhere. Clearly, where effects cannot be mitigated, allocations on such sites should not be pursued.
- 3.5.14 In appraising the proposed options, no significant adverse effects requiring a full Habitat Regulations Assessment or Equality Impact Assessment were identified.

Sustainability Appraisal of the Pre-Submission Draft Local Plan, November 2017 (LP005)

- 3.5.15 This document was a Sustainability Appraisal of the policies and sites set out in the Pre-Submission Draft Local Plan. As the Pre-Submission Draft was an evolution of the Draft, much of the appraisal was the same as set out above.
- 3.5.16 During the consultation on the Draft Local Plan, approximately seven comments related to the Sustainability Appraisal were made. These comments largely supported claims made in individual appraisals regarding positive sustainability effects of specific allocations. Only two comments proposed changes, both of which were made. Additional detail was added defining 'high flood-risk' are recommended by the Environment Agency. The second recommendation was to assess strategic growth options outside Reading Borough to provide a general understanding of the sustainability implications of any urban extensions, even though these were not proposals in the plan itself. Thus, the Sustainability Appraisal of the Pre-Submission Draft Plan assessed four possible strategic growth options: Northwest of Reading Borough, Northeast of Reading Borough, Southwest of Reading Borough and Southeast of Reading Borough. In addition to these new

appraisals, the four policies added to the Pre-Submission Draft were assessed: EN17 - Noise Generating Equipment, H4 - Build To Rent Schemes, CR16 - Areas to the North of Friar Street and East of Station Road and WR4: Potential Traveller Transit Site at Cow Lane.

Habitat Regulations Assessment

3.5.17 Article 6 of the Habitats Directive 92/43/EEC deals with the management of Natura 2000 sites, which includes Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Where land use plans may have a significant effect on a Natura 2000 site, plans are subject to appropriate assessment, in accordance with statutory requirements. The Sustainability Appraisal process incorporates the screening level Habitat Regulations Assessment for the Local Plan and Proposals Map. In summary, no significant effects were found to be likely on Natura 2000 sites, and as such no full Habitat Regulations Assessment was necessary.

Equality Impact Assessment

3.5.18 An Equality Impact Assessment stems from the Equality Act 2010, and looks at how a policy or function will affect people from different groups and in turn whether it has a negative impact on groups or individuals in particular with regard to race, gender, disability, sexual orientation, age or religious belief. The Sustainability Appraisal process incorporates the screening level Equality Impact Assessment for the Local Plan and Proposals Map. In summary, no significant adverse impacts on protected characteristics were identified, and as such no full Equality Impact Assessment was necessary.

3.6 Soundness and Legal Compliance

3.6.1 The National Planning Policy Framework (NPPF) states that Local Plans should be assessed for their 'soundness', as well as for their compliance with legal and procedural requirements and the duty to co-operate. To be 'sound', a Local Plan should be **positively prepared**, **justified**, **effective** and **consistent with national policy**. The Council has completed the Soundness and Legal Compliance Self-Assessment Toolkits (EV004 and EV003) produced by the Planning Advisory Service, and these set out in more detail how these tests have been met. A broad summary is below.

Positively Prepared

- 3.6.2 According to the NPPF, "the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure= requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development".
- 3.6.3 In general, the headline objectively assessed development needs between 2013 and 2036 can be summarised as:
 - 16,077 additional dwellings (699 per annum) (SHMA¹⁰);
 - 406 affordable homes per annum (SHMA, as part of the provision above);
 - 253 additional residential care bedspaces (SHMA);
 - 10-17 permanent traveller pitches (GTTSHDAA¹¹);
 - 10 traveller transit pitches (GTTSHDAA);
 - 2 travelling showpeople plots (GTTSHDAA);

¹⁰ Berkshire (with South Bucks) Strategic Housing Market Assessment, February 2016, EV011

¹¹ Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment, September 2017, EV016

- 52,775 sq m of additional office floorspace (EDNA¹², Scenario 3);
- 148,440 sq m of additional industrial and warehouse floorspace (EDNA, Scenario 3);
- Up to 34,900 sq m of additional retail floorspace (RLS¹³).
- 3.6.4 The scope to accommodate this need has been assessed through the Housing and Economic Land Availability Assessment (EV014, November 2017), although in the case of accommodating additional need for industrial and warehouse space, this is supplemented through the Reading Employment Area Analysis (EV010, March 2018). The HELAA balances the capacity to accommodate needs with the degree to which doing so would achieve sustainable development, by considering issues highlighted in the NPPF such as heritage, biodiversity, character, flood risk and many more.
- 3.6.5 In the case of office, industrial and warehouse needs and residential care, the Local Plan makes provision to meet the full objectively assessed needs.
- 3.6.6 The position with regards meeting objectively assessed need for housing is set out in the Local Plan. The HELAA demonstrates that the vast majority of the need (96%) can be accommodated within the Borough over the plan period. However, this leads to a shortfall of 644 dwellings in total, largely arising towards the end of the plan period. This will need to be accommodated elsewhere. There has been considerable discussion on how to accommodate this shortfall, which is set out in detail in the Duty to Co-operate Statement (EV001). This has resulted in the signature of a Memorandum of Understanding between the four authorities in the Western Berkshire Housing Market Area, recognising that there is a need that cannot be accommodated within Reading's boundaries, and agreeing that needs should be met within the Housing Market Area, and this MoU is included within the Duty to Co-operate Statement. Other Local Plans within the area are not yet at a stage where the capacity to accommodate unmet needs can be assessed, which is why the Local Plan is not able to identify where specifically within the HMA the unmet needs should be accommodated.
- 3.6.7 The identified needs for gypsy and traveller accommodation are much more limited in scale than the other needs, but present particular difficulties as there are no existing gypsy and traveller facilities in Reading, and very little history of interest in providing such facilities. The Council has identified a potential site to meet transit needs, and is continuing work on investigating this in more detail, as highlighted in policy WR4 of the Local Plan. However, no potential to meet the permanent needs within the Borough has been identified. This is described in more detail in the Gypsy and Traveller Provision Background Document (EV019), and details of discussions with neighbouring authorities about the issue is summarised in the Duty to Co-operate Statement (EV001). No agreement has been reached on accommodating these unmet needs. In the case of travelling showpeople, the small size and longer-term nature of the identified need means that it is best accommodated as an extension to the existing site.
- 3.6.8 In the case of retail floorspace, the objectively assessed need is phrased as a maximum of 34,900 sq m, recognising that assessing long-term retail needs is a difficult and uncertain process. There are sites, mainly within the town centre, that could potentially accommodate this need, but the experience has been that, when such sites are brought forward, interest in significantly increasing retail

¹² Central Berkshire Economic Development Needs Assessment, November 2016, EV009

¹³ Western Berkshire Retail and Leisure Study, May 2017, EV020

floorspace is limited, and the recent trend in completions has been for a loss of floorspace. A hard insistence on high retail provision within sites risks preventing them coming forward, and puts delivery of uses such as housing at risk. The HELAA identifies a net gain of 5,192 sq m, but sites have the flexibility to accommodate a great deal more floorspace if there is interest without a significant decrease in other uses on site. This is demonstrated in section 4.52 of this paper.

- 3.6.9 In terms of unmet needs from other authorities, the Council (together with other local authorities) has received two requests to help meet unmet needs from elsewhere. This is described in more detail in the Duty to Co-operate Statement (EV001).
- 3.6.10 Bracknell Forest Borough Council considers that it is unlikely to be able to meet its needs for employment use as highlighted in the EDNA in full, and requested that neighbouring authorities consider helping to meet these needs. The scale of likely unmet need has not been quantified. The HELAA process has not identified capacity to meet additional needs from elsewhere for industrial and warehouse uses, but has identified scope to accommodate a greater level of office provision than the identified need. The Local Plan states that this may be considered as a contribution to unmet needs from elsewhere, but that the full picture of unmet needs across the Functional Economic Market Area (which also includes Wokingham and Windsor and Maidenhead) should be taken into account.
- 3.6.11 Slough Borough Council enquired about the possibility of local authorities in the Western Berkshire HMA helping to meet its considerable likely unmet housing and employment needs. The scale of this unmet need was, again, not quantified. In the case of housing, the Council has responded that, as it is unable to meet its own needs in full, it will not be able to accommodate unmet needs from elsewhere. In terms of employment, Reading identified, as above, some additional scope for office provision, but stated that the priority should be for meeting unmet needs from within its identified FEMA, which does not include Slough.
- 3.6.12 As such, the Local Plan is considered to be positively prepared in that it seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified

- 3.6.13 To be justified, a plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
- 3.6.14 The Local Plan, together with accompanying Proposals Map, has been founded on a robust and credible evidence base. This evidence base will be submitted at the same time as those documents. This document forms part of the evidence base.
- 3.6.15 The Local Plan contains the most appropriate strategies when considered against the reasonable alternatives. Section 4 of this background paper lists the reasonable alternatives for each policy and summarises why they were rejected. These reasonable alternatives have all been subject to sustainability appraisal, and the Sustainability Appraisal of the Pre-Submission Draft Local Plan (LP005) appraises each policy alongside those reasonable alternatives.

Effective

3.6.16 The Local Plan is effective. To be effective, a plan should be deliverable over its

period and based on effective joint working on cross-boundary strategic priorities.

- 3.6.17 The Local Plan is deliverable. Section 11 of the Local Plan details how the plan can be delivered, including a summary of the Infrastructure Delivery Plan. A Viability Testing Report of the requirements for residential development in the Local Plan has been undertaken (EV006), and confirms that the requirements do not present a burden to developers that will stifle the deliverability of the plan. In addition, the HELAA looks at delivery of individual development sites, and these have led to realistic assumptions in the site specific and overall development figures.
- 3.6.18 The plan is based on effective joint working on cross-boundary strategic priorities. There has been particular joint working on accommodating development needs and planning for strategic infrastructure needs. The Duty to Co-operate Statement (EV001) looks at this joint working in much more detail, and demonstrates how this requirement has been fulfilled.

Consistent with National Policy

- 3.6.19 The plan should enable the delivery of sustainable development in accordance with the policies in the NPPF. Section 19(2)(a) of the Planning and Compulsory Purchase Act 2004 states that, in preparing a Local Development Document, the local planning authority must have regard to national policies and advice contained in guidance issued by the Secretary of State.
- 3.6.20 The Local Plan, together with the Proposals Map, is consistent with national policy. The completed Soundness Self-Assessment Toolkit (EV004) goes through elements of the NPPF and other national policy documents and sets out how those individual elements have been complied with, and there is no need to list individual aspects of that guidance here. However, it is worth briefly considering the Core Planning Principles from paragraph 17 and the requirements for Local Plans in paragraphs 156 and 157 of the NPPF.

Para	NPPF Provision	Local Plan response
17	Should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up -to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency	The Local Plan sets out a positive and proactive vision for the area, informed by joint-working and co-operation by local people and affected organisations. The policies in the plan are intended to set a pragmatic means of achieving the vision and objectives, and to give sufficient certainty to applicants to enable them to understand how decisions are likely to be made.
	Should not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives; Should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other	The whole plan seeks to achieve this, and it is intrinsic to the vision and objectives of the plan (see for example objective 1, 3, 6, 8 and 9) Policies CC9, EM1-4, H1, H3, RL2, OU1, as supported by the relevant background evidence such as the SHMA and EDNA. Also secured through the site allocation policies.

 Table 3.4: National policy compliance summary

development needs of an area, and	
respond positively to wider opportunities	
for growth. Plans should take account of	
market signals, such as land prices and	
housing affordability, and set out a clear	
strategy for allocating sufficient land	
which is suitable for development in their	
area, taking account of the needs of the	
residential and business communities;	
Should always seek to secure high quality	Policies CC7, CC8, also taken account
design and a good standard of amenity for	of in site allocation policies.
all existing and future occupants of land	or in site anotation poncies.
and buildings;	
	The different releasend character of
Should take account of the different roles	The different roles and character of
and character of different areas,	parts of Reading are set out in the
promoting the vitality of our main urban	various area strategies in chapters 5-9,
areas, protecting the Green Belts around	and have been taken into account in
them, recognising the intrinsic character	drawing up site allocations. There is
and beauty of the countryside and	no Green Belt in Reading, and only
supporting thriving rural communities	very small slivers of rural land.
within it;	-
Should support the transition to a low	Policies CC2, CC3, CC4, CC5, EN18,
carbon future in a changing climate, taking	H5, H8, although elements of these
full account of flood risk and coastal	matters are throughout various parts
change, and encourage the reuse of	of the plan.
existing resources, including conversion of	
existing buildings, and encourage the use	
of renewable resources (for example, by	
the development of renewable energy);	
Should contribute to conserving and	Policies EN7, EN8, EN12, EN13, EN14,
enhancing the natural environment and	EN15, EN16, EN17, together with site
reducing pollution. Allocations of land for	allocations policies.
development should prefer land of lesser	
environmental value, where consistent	
with other policies in this Framework;	
Should encourage the effective use of land	Overall spatial strategy focusing
by reusing land that has been previously	development on brownfield sites
developed (brownfield land), provided that	across Reading. Also policies CC6 and
it is not of high environmental value;	various site allocation policies.
Should promote mixed use developments,	Overall spatial strategy focusing
	1 03 0
and encourage multiple benefits from the	development into centres where a mix
use of land in urban and rural areas,	of uses can be achieved, together with
recognising that some open land can	all site allocation policies.
perform many functions (such as for	
wildlife, recreation, flood risk mitigation,	
wildlife, recreation, flood risk mitigation, carbon storage, or food production);	
wildlife, recreation, flood risk mitigation,	Policies EN1-EN6, CR15, CR16
wildlife, recreation, flood risk mitigation, carbon storage, or food production);	Policies EN1-EN6, CR15, CR16
wildlife, recreation, flood risk mitigation, carbon storage, or food production); Should conserve heritage assets in a manner appropriate to their significance,	Policies EN1-EN6, CR15, CR16
wildlife, recreation, flood risk mitigation, carbon storage, or food production); Should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their	Policies EN1-EN6, CR15, CR16
wildlife, recreation, flood risk mitigation, carbon storage, or food production); Should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this	Policies EN1-EN6, CR15, CR16
wildlife, recreation, flood risk mitigation, carbon storage, or food production); Should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;	
wildlife, recreation, flood risk mitigation, carbon storage, or food production); Should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations; Should actively manage patterns of growth	Overall spatial strategy focusing
wildlife, recreation, flood risk mitigation, carbon storage, or food production); Should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations; Should actively manage patterns of growth to make the fullest possible use of public	Overall spatial strategy focusing development on central and south
wildlife, recreation, flood risk mitigation, carbon storage, or food production); Should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations; Should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus	Overall spatial strategy focusing development on central and south Reading. Also policies CC6, TR1, TR4,
wildlife, recreation, flood risk mitigation, carbon storage, or food production); Should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations; Should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which	Overall spatial strategy focusing development on central and south
wildlife, recreation, flood risk mitigation, carbon storage, or food production); Should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations; Should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and	Overall spatial strategy focusing development on central and south Reading. Also policies CC6, TR1, TR4, RL1.
wildlife, recreation, flood risk mitigation, carbon storage, or food production); Should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations; Should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and Should take account of and support local	Overall spatial strategy focusing development on central and south Reading. Also policies CC6, TR1, TR4, RL1. Policies CC9, RL1 and Infrastructure
wildlife, recreation, flood risk mitigation, carbon storage, or food production); Should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations; Should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and Should take account of and support local strategies to improve health, social and	Overall spatial strategy focusing development on central and south Reading. Also policies CC6, TR1, TR4, RL1.
wildlife, recreation, flood risk mitigation, carbon storage, or food production); Should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations; Should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and Should take account of and support local	Overall spatial strategy focusing development on central and south Reading. Also policies CC6, TR1, TR4, RL1. Policies CC9, RL1 and Infrastructure

	sufficient community and cultural facilities	
	and services to meet local needs.	
156	Include strategic policies to deliver the	Policies EM1, H1, H3, RL1
	homes and jobs needed in the area;	
	Include strategic policies to deliver the	Policies CC4, CC9, TR1, TR2, TR4,
	provision of infrastructure for transport,	OU3. Policies on waste management
	telecommunications, waste	infrastructure will be part of the
	management, water supply, wastewater,	Central Berkshire Minerals and Waste
	flood risk and coastal change	Local Plan.
	management, and the provision of	
	minerals and energy (including heat);	
	Include strategic policies to deliver the	Policies CC9, RL2, the Infrastructure
	provision of health, security, community	Delivery Plan and a variety of site
	and cultural infrastructure and other local	allocations policies.
	facilities;	
	Include strategic policies to deliver	Policies CC2, CC3, CC4, EN1-6, EN7,
	climate change mitigation and adaptation,	EN8, EN12, EN13, EN14, EN15, EN16,
	conservation and enhancement of the	H5
	natural and historic environment,	
	including landscape.	
157	Plan positively for the development and	The whole Local Plan seeks to achieve
	infrastructure required in the area to meet	this, but in particular policies CC9,
	the objectives, principles and policies of	EM1, H1, H3, RL2.
	this Framework;	
	Be drawn up over an appropriate time	The Local Plan period is 2013 to 2036.
	scale, preferably a 15-year time	
	horizon, take account of longer term	
	requirements, and be kept up to date;	
	Be based on co-operation with	A variety of organisations are covered
	neighbouring authorities, public, voluntary	by the Duty to Co-operate, and the
	and private sector organisations;	Duty to Co-operate Statement details
		the co-operation that has taken place.
		The Statements of Consultation show
		the measures that have been
		undertaken during the consultation
		periods, but there has also been other
		ongoing co-operation, such as the
		work undertaken with the
		Conservation Area Advisory
	Indicate broad locations for strategic	Committee.
	Indicate broad locations for strategic	Figure 3.2 of the Local Plan shows the
	development on a key diagram and land-	spatial strategy in a key diagram form,
	use designations on a proposals map;	and there are also more specific
		diagrams for each area of Reading
		(figures 5.1, 6.1, 7.1, 8.1 and 9.1).
		The Local Plan is accompanied by a
		Proposals Map showing land use
		designations.
	Allocate sites to promote development and	All site allocation policies.
	flexible use of land, bringing	
	forward new land where necessary, and	
	provide detail on form, scale,	
	access and quantum of development	
	where appropriate;	Policios rostricting changes of use in
	Identify areas where it may be necessary	Policies restricting changes of use in
	to limit freedom to change the uses of buildings, and support such restrictions	specific circumstances include EM3, EM4, H8, RL3 and RL4, and these are
1		
	with a clear explanation;	supported by explanations. Other types of restriction include Article 4

Identify land where development would be inappropriate, for instance because of its environmental or historic significance;	directions - the Local Plan identifies existing article 4s, but does not propose specific new directions. No land has been identified where any development would be inappropriate, but policies EN1-6 are in place to ensure that development does not detrimentally affect the significance of an asset.
Contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.	Policies CC7, EN2-6, EN12, EN14.

Legally compliant

3.6.21 The Local Plan is legally compliant. The Council has completed a Legal Compliance Self-Assessment Toolkit (EV003), included as part of the evidence base, that details how the legal requirements have been complied with. Some of this refers back to elements within this background paper, such as compliance with requirements on sustainability appraisal and the relationship with the Local Development Scheme and Statement of Community Involvement.

Duty to Co-operate

3.6.22 The Local Plan complies with the Duty to Co-operate, introduced within the Localism Act 2011. The Council has prepared a Duty to Co-operate Statement (EV001) which includes evidence showing how this requirement has been complied with.

3.7 Compliance with Regional Spatial Strategy

- 3.7.1 Reading falls within the South East region. The Regional Spatial Strategy for the area, the South East Plan, was approved in May 2010, and included a number of policies which set the framework for Reading's plan, including housing figures. The Plan was partially revoked on 25th March 2013, meaning that the vast majority of it is no longer of relevance. The exception is policy NRM6, which deals with the Thames Basin Heaths Special Protection Area.
- 3.7.2 NRM6 deals with mitigation measures for development which is likely to have an effect on the SPA. It sets a zone of influence of 5 km from the SPA boundaries, within which specified mitigation, including access management and the provision of Suitable Alternative Natural Greenspace (SANG) must be put in place.
- 3.7.3 At its closest point, Reading Borough is 6km away from the nearest part of the SPA. The closest residential allocation within the Local Plan (SA2: Land North of Manor Farm Road) is 8 km away. Therefore, the specific measures in NRM6 would not generally apply. The general principle to avoid negative impacts on the SPA is relevant, but this is generally tested through the requirement for Habitat Regulations Assessment, the screening level of which makes up part of Reading's Sustainability Appraisal process. No significant effects on the SPA as a result of the proposed Local Plan approach are considered likely.
- 3.7.4 Therefore, the Local Plan complies with the remaining policy from the Regional Spatial Strategy.

3.8 Internal Consistency

- 3.8.1 Under the nine 'tests of soundness', which were a requirement for Development Plan Documents until 2008, strategies/policies/allocations in the plan had to be coherent and consistent within DPDs prepared by the authority. Whilst this is no longer an explicit requirement, it is clearly important that there is internal consistency within the Local Plan, if the policies and proposals are to be effectively delivered.
- 3.8.2 Therefore, a matrix exploring the relationship between policies in the Local Plan (and, by extension, the Proposals Map) is set out in Appendix 8, which shows whether one policy helps to achieve the aims of another (✓✓), are merely in conformity with it (✓), or whether there is an issue that merits further explanation. These issues are numbered on the matrix, and discussed below. Where policies have no particular relevance to one another, they are considered to be in general conformity unless there are good reasons to think otherwise. In general, the policies have been assessed as being consistent with each other, and many of the policies have a functional relationship with each other in implementing the Core Strategy. However, there are some issues which merit further scrutiny to consider whether there is a genuine inconsistency. These are detailed below, with the numbers relating to the numbers on the matrix in Appendix 8.
 - CC2 (Sustainable Design and Construction) seeks improved sustainability performance of buildings. There is a potential tension with some of the heritage policies, notably EN1 (Protection and Enhancement of the Historic Environment), EN3 (Enhancement of Conservation Areas) and EN4 (Locally Important Heritage Assets), in that upgrades to environmental performance can come into conflict with the historic integrity of the building. Ultimately, this will be a balancing act that needs to be struck on a case by case basis, as the significance of each individual asset is different.
 - 2. CC2 (Sustainable Design and Construction) sets out strong sustainability requirements, and seeks improved environmental performance from developments. The matrix highlights all development allocations, as, with any development, there will be environmental costs from the development phase. However, developments will all have to comply with CC2 and related sustainability policies, so, in the long-term, this effect should be mitigated through improved environmental performance.
 - 3. This concerns the relationship between CC3 (Adaptation to Climate Change), and some development allocations. There are a number of sites are allocated for development in Flood Zones 2 or 3, and flooding is expected to worsen with climate change. However, the allocated sites have passed a sequential test in line with the NPPF, and are therefore considered appropriate in terms of national policy. This analysis was based on the Strategic Flood Risk Assessment (EV025), which took account of worsening conditions with climate change. It is considered that some of these developments can actually reduce the risk of flooding. See the Sequential and Exception Test document (EV028) for more details.
 - 4. CC5 (Waste Minimisation and Storage) seeks to minimise the amount of waste generated. The matrix highlights the relationship between this and all allocations for new development, as such development by its nature will

generate waste, particularly where it involves demolition of existing buildings, as will be the case on most sites. This is inevitable to an extent, but development on these allocated sites will need to comply with CC5, and this should therefore be mitigated insofar as is possible.

- 5. CC6 (Accessibility and the Intensity of Development) seeks the highest intensity of development in the most accessible areas. The town centre of Reading is the most accessible part of the Borough, but at the same time it contains the greatest focus of heritage assets, which means a potential tension with heritage policies. Therefore, the individual high density allocations in the town centre have needed careful consideration to ensure that development conserves, and where appropriate enhances, these assets. Site allocation policies further highlight the need for heritage to be considered.
- 6. As above, CC6 will mean high-intensity development in the town centre, as well as along main transport corridors, and the vast majority of these areas are within an Air Quality Management Area, and presents a possible tension with EN15 (Air Quality). To avoid further worsening air quality, it is important that these developments promote sustainable transport modes and build in mitigation measures. EN15 will mean that air quality is considered throughout the development process.
- 7. The concentration on the town centre resulting from CC6 (see above) may also have impacts on EN18 (Flooding and Sustainable Drainage), as much of the town centre is at risk of flooding. However, the sites in these areas have passed a sequential test in line with the NPPF, and are therefore considered appropriate in terms of national policy. It is considered that some of these developments can actually reduce the risk of flooding. See the Sequential and Exception Test document (EV028) for more details.
- 8. Although H1 seeks significant housing provision, and H2 and CC6 would result in high intensity development in the accessible town centre, particularly for residential, CR9 (Terraced Housing in Central Reading) and CR16 (Areas to the North of Friar Street and East of Station Road) retain some comparatively lower density areas in the centre. These areas are exceptional, because they make a significant positive contribution to the character of the centre, and do not prevent a large amount of development being achieved in the centre.
- 9. The policies that propose significant levels of development, notably EM1 (Provision of Employment), H1 (Provision of Housing) and RL2 (Scale and Location of Retail, Leisure and Culture Development) may have impacts on amenity of existing residents as safeguarded by CC8 (Safeguarding Amenity). However, this has been considered through the individual allocations, and new development will need to meet the CC8 requirements in any case.
- 10. CC9 (Securing Infrastructure) and H3 (Affordable Housing) contain a variety of priorities for a limited pot of available financial contributions from developers. However, the levels of contribution sought for each have been set at a level that should be viable to provide, and take account of the highest priorities for Reading.
- 11. Policies RL2 (Scale and Location of Retail, Leisure and Culture Development) and EM2 (Location of New Employment Development) direct significant levels of development towards central Reading, which is a location for a significant

proportion of Reading's heritage assets, protected by EN1 (Protection and Enhancement of the Historic Environment). Most of the policies that allocate specific development sites also include sites in close proximity to, or including, identified assets. Therefore, the individual high density allocations in the town centre have needed careful consideration to ensure that development conserves, and where appropriate enhances, these assets. Site allocation policies further highlight the need for heritage to be considered.

- 12. CR10 (Tall Buildings) identifies a number of locations in the centre where tall buildings may be appropriate, and, as set out above, this will mean tall buildings in close proximity to heritage assets protected by EN1 (Protection and Enhancement of the Historic Environment). However, the effect on heritage assets of each location has been considered through the Tall Buildings Strategy (EV030) and Update (EV031), and has therefore been factored into the policy.
- 13. As for 11 above, the focusing of development on Central Reading means development is likely to take place in identified Areas of Archaeological Potential (EN2). Many allocated sites across the Borough have identified archaeological potential. This is an unavoidable aspect of development in an established urban area, but policy EN2 and the relevant site allocation policies highlight the issue.
- 14. EN5 (Protection of Significant Views with Heritage Interest) identifies a number of 'heritage views' within the Borough. Whilst these are not generally panoramic views of Central Reading, which have been separately considered in developing the approach to tall buildings, it is nevertheless possible that some tall building locations under CR10 (Tall Buildings) may be visible within view 2 in particular. However, this view is specifically identified within the Western Grouping in CR10, and development should not therefore detrimentally affect the view.
- 15. There are also some development allocations which fall within views identified under EN5. In particular, sites CR13d is partly visible within view 2, and sites WR3a, b and c fall within view 6. However, the development levels proposed on these sites should not result in a negative effect on the views, and may actually enhance them.
- 16. EN8 (Undesignated Open Space) seeks to retain open spaces that are not subject to formal designations. There is a potential tension with H14 (Suburban Renewal and Regeneration), as some of the potential for regeneration and development in these areas is in the form of underused and low quality open areas. However, H14 addresses this point by specifying that quantitative loss of space should be outweighed by qualitative gain and/or community benefits.
- 17. A small number of sites identified under policies WR2, WR3, WR4 and CA1 would lead to the loss of some space that would be covered by EN8 (Undesignated Open Space). The acceptability of loss of this land, which is not generally in any case open to public use, has been considered in developing the site allocations, in particular through the HELAA process, and is considered to be justified.
- 18. There have been concerns expressed in past consultation that the development identified in WR4 (Traveller Transit Site at Cow Lane) would affect access to

the significant riverside open spaces along Cow Lane, used by many local residents, and therefore would not reflect the aims of EN10 (Access to Open Space). This point is therefore included within policy WR4, and proposals would need to demonstrate that there will not be an adverse effect on this access.

- 19. SR5 promotes leisure and recreation use of some areas along the River Kennet, and these areas also have biodiversity significance as identified under EN12 (Biodiversity and Green Network). This balancing act is inherent in promoting multi-functional use of areas adjacent to watercourses. The issue is recognised within policy SR5 itself, and proposals would need to be low-intensity in order to avoid detrimental effects on areas of wildlife significance.
- 20. EN13 deals with Major Landscape Features, as well as the AONB adjacent to Reading. There are a number of development allocations in close proximity to identified major landscape features, in particular in the town centre, as well as CR10 identifying locations which may be appropriate for tall buildings. There is a risk that inappropriate development in these locations could cause detrimental landscape effects. However, the allocations, including the appropriate levels of development, as well as the tall buildings strategy have been drawn up with these landscape features in mind. The relevant policies also highlight the landscape features as an issue.
- 21. EN15 deals with air quality. Reading faces challenges in terms of air quality, in particular in the most accessible locations. An Air Quality Management Area has been declared which covers the town centre and all major radial transport corridors, and therefore a large proportion of potential development sites. Therefore, those policies which provide for high levels of development overall (EM1, H1 and RL1) as well as allocations for development within the AQMA and which would potentially increase travel in the AQMA, will need to be considered in terms of air quality. To avoid further worsening air quality, it is important that these developments promote sustainable transport modes and build in mitigation measures. EN15 will mean that air quality is considered throughout the development process.
- 22. Policy EM1 seeks provision of high levels of employment development, particularly for industrial and warehousing. This can lead to high levels of noise and disturbance, which would bring it into conflict with policy EN16 (Pollution and Water Resources). However, this is one of the reasons that policy EM2 then seeks to direct such development to Core Employment Areas and the A33 corridor, where effects on the amenity of existing residents will be minimised.
- 23. A number of the development allocations would place residents in areas where there would be noise effects, or would potentially result in noise effects on existing residents, and there is therefore a relationship with EN16 (Pollution and Water Resources). Some allocations include specific measures to manage this issue, such as a buffer strip in SR1 and SR3, whilst on other sites this will need to be managed on a case-by-case basis as highlighted in the relevant policies.
- 24. There are high levels of need identified for both employment (EM1) and housing (H1) over the plan period. There are therefore competing demands for scarce available land in Reading, and one particular pressure is for loss of

employment areas for residential, which is the subject of EM3 (Loss of Employment Land). The Local Plan seeks to balance these competing needs throughout its strategy and within its allocations, and is able to meet the employment needs and the vast majority of the housing need. On some mixed use sites, there is scope for flexibility in the balance of uses.

- 25. EM3 seeks to prevent loss of employment land where it is still required for employment use, whereas a number of site allocation policies would result in the loss of existing employment land, generally for housing. These areas have been through an Employment Area Analysis (EV010) to identify which areas can be released for alternative uses, and it is considered that loss of employment can be justified in these cases.
- 26. RL3 (Vitality and Viability of Smaller Centres) manages the uses within district and local centres, particularly at ground floor level. There is a potential inconsistency with H1 (Provision of Housing), because loss of ground floor retail could represent an opportunity for additional housing. However, the amount of housing that could result would be very small in comparison to the overall need, and would be outweighed by the significant negative impacts in terms of maintaining access to services and facilities in local areas.
- 27. Policy CR10 (Tall Buildings) restricts tall buildings to certain areas of the town centre, and some representors have argued that this approach prevents the Borough meeting a greater proportion of its identified housing needs (related to policy H1). It is true that a less restrictive approach would result in higher levels of housing, but it is recognised in the NPPF that meeting needs must be balanced against considerations such as design and heritage. The background to the tall buildings policy (EV030 and EV031) shows why certain areas are not considered appropriate for tall buildings. In general, whilst additional tall buildings may generate additional some additional dwellings, the costs of this approach in terms of the far-reaching implications of poorly-sited tall buildings significantly outweigh the limited gains.
- 28. H5 (Housing Standards) introduces the nationally-described internal space standard in Reading. Minimum standards can reduce the densities at which new residential can be developed, meaning a potential conflict with density policies such as H2 (Density and Mix). It is recognised that meeting required densities within the town centre could make it difficult to meet the internal space standard, which is why this part of H5 does not apply in the centre. However, elsewhere, much recent development has managed to be developed at the required densities whilst still providing adequate internal space, and it is considered that there is no reason why this cannot be achieved in these locations.
- 29. Whilst policy H2 seeks additional family-housing of more than 3 bedrooms, H8 allows, under some circumstances, conversion of larger accommodation to flats. This is because blocking all conversions would be unreasonable and inflexible, and could prevent some needs being met (which, in the inner areas are sometimes for smaller flats). This is addressed to an extent by the clause in policy H8, which retains at least one 2-bed (or larger) flat within any conversion.
- 30. H2 (Density and Mix) sets out a range of residential densities, which could have a potential perceived tension with H10 (Private and Communal Outdoor Space)

which requires a certain level of outdoor space. However, the Council considers that it is relatively straightforward to meet all requirements in terms of density, mix and outdoor space on a range of sites. H10 is flexibly worded to reflect this issue, seeking functional outdoor space rather than minima, with space standards included as indicative guidelines only. This issue could be particularly difficult in centres, but H10 relaxes the requirements in centres in any case.

- 31. Policy H11 (Development of Private Residential Gardens) sets out criteria to manage proposals to develop residential gardens for housing. There are a number of policies which propose development of garden land (WR3, CA1 and ER1). In addition, H14 (Suburban Renewal and Regeneration) looks for opportunities for intensification of existing housing estates, which could potentially result in some loss of garden land. Where loss of garden land is proposed, the HELAA process has looked at the key issues dealt with by H10 such as design and character, amenity and biodiversity, and concluded that development of the site is appropriate.
- 32. H12 (Student Accommodation) directs proposals for new student accommodation to existing higher education or student accommodation sites. However, ER1a (the Woodley Arms PH, Waldeck Street) and CR13a (Reading Prison) include student accommodation as a potential use even though these sites do not fulfil the requirement of the policy. There are particular reasons for this in each case. Reading Prison is a unique listed building, now vacant, which will be challenging to convert due to its unique layout. There therefore needs to be a wide range of potential options for conversion to ensure that its historic significance is conserved. The Woodley Arms meanwhile has already been the subject of planning applications for student residential, and the previous refusal has not been on the basis of the principle of the use, rather on the specific design and scale of the development proposed, so it is considered reasonable to continue to include student accommodation as an option.
- 33. RL2 directs retail development towards the centre of Reading, and CR1 defines the centre for the purposes of applying the sequential test under the NPPF as being the Primary Shopping Area. However, policies CR12a (Cattle Market) and CR13b (Forbury Retail Park) include proposals for retail development outside the Primary Shopping Area. This requires demonstration of compliance with the sequential approach, and this is dealt with in Appendix 7 of this background paper.
- 34. There are two proposals that would result in a loss of a public house or land for leisure, namely SR2 (Land North of Manor Farm Road), which would potentially result in the loss of a bingo facility and another unit recently used as a trampoline centre, and ER1a (The Woodley Arms, Waldeck Street), which is a public house. There could be seen to be a potential inconsistency with RL6 (Protection of Leisure Facilities and Public Houses). In the case of the Woodley Arms, the principle of loss of the facility has already been established by a planning permission to convert the building to dwellings, and the proposed policy does not change the approach in a way that would be likely to affect this conclusion. In the case of the bingo hall at Manor Farm Road, the allocation brings this within an expanded Whitley District Centre. Should there be a need to retain leisure use within the site, it would be a loss of leisure (for instance Central Pool and Arthur Hill pool) are predicated on replacement

elsewhere, whilst the use of some land at Reading Golf Club would be to enable the survival of the facility with a new clubhouse.

- 35. Policy OU1 deals with loss of community facilities, and there are two allocated sites in particular where land currently used for community uses would be lost. CR14b is the site of the former Reading Family Centre. This Council-owned facility burned down some years ago, and is now no longer required for this use. It has been in temporary education use since then, but this was never intended to be its permanent use. ER1d (Land adjacent to 40 Redlands Road) includes a community hall used for religious uses. However, it is not a use that is open to the local community or addresses any particular local need, so the loss of the use should not have a notable effect on community provision in the locality. Provision of a new community use on the site could be appropriate, but since it would continue an established use it would not require a particular allocation in the Local Plan.
- 36. There is one allocation which would result in development in close proximity to a site where there is storage of hazardous substances, which are dealt with by policy OU2 (Hazardous Installations), namely SR2 (land North of Manor Farm Road), which is adjacent to the Gillette factory at 452 Basingstoke Road. This issue is acknowledged in SR2, which sets out ways for this to be mitigated, including through provision of a buffer, which could include employment uses along the Manor Farm Road frontage. This is therefore dealt with in the allocation itself.
- 37. A potential tension is identified between residential uses and drinking establishments in the centre in terms of residential amenity, and this therefore relates to policies CR5 (Drinking Establishments in Central Reading) and CR6 (Living in Central Reading). This issue is specifically addressed in paragraph 5.3.24, however, which makes clear that where such a tension cannot be avoided by mitigation measures, it may be that residential development should not take place in the worst-affected areas.
- 3.8.3 Therefore, policies within the Local Plan and Proposals Map are considered to be consistent with one another and, in many cases, help achieve each other's aims. Where there is a potential tension, it is generally resolved within the Plan itself.

3.9 Flexibility to Deal with Changing Circumstances

- 3.9.1 Local Plans should be flexible to cope with changing circumstances. This section therefore sets out some possible changes in circumstances that could occur during the plan period, and discusses the flexibility of the Local Plan to deal with those changes.
- 3.9.2 It is worth first stating, however, that no worthwhile plan can be sufficiently flexible to deal with absolutely any changes. A Local Plan should emerge from a consideration of the key characteristics of Reading, and should contain those elements that are specific to the area. Any plan that is bland and flexible enough to deal with extreme changes in circumstances that affect the characteristics of the area is unlikely to have been sufficiently place-specific in the first place. Such a major change in characteristics would necessitate a review of the Local Plan.
- 3.9.3 The paragraphs below identify some possible changes in circumstances and consider the flexibility of the Local Plan to respond.

Changes to the Planning System

3.9.4 The most significant change to the planning system that is immediately foreseeable is the production of a new National Planning Policy Framework. A draft was published in March 2018. There has been very little opportunity to digest the changes proposed and their full implications for the Local Plan. However, a brief summary of some of the headline changes is set out in table 3.5 below, along with an initial comment on how the Local Plan fits in. In general terms, it is not considered that the proposals in the draft NPPF present a particular issue for the Local Plan in terms of consistency. There may be some specific issues, e.g. the proportion of allocated housing which is on smaller sites, but the Council is confident that the stance of the Local Plan in this regard could be justified if this requirement is within the final version.

Proposed NPPF change	Comment on Reading Local Plan		
Chapter 2: Achieving sustainable development			
Re-ordering of presumption in favour of sustainable development, amendments to high level objectives and deletion of core planning principles	These structural changes are not considered to fundamentally alter the overall approach of the Framework, and the Local Plan shoul be broadly in compliance.		
Additional certainty for neighbourhood plans	There are no neighbourhood plans or designated areas in Reading		
Chapter 2: Plan-making			
Definition of strategic priorities	The Local Plan does not currently differentiate between strategic policies and other policies. However, the strategic policies set out are present in the Local Plan.		
Amendments to soundness tests	The new tests are an evolution of the existing and will not adversely affect the soundness of the plan. In particular the emphasis on constructive joint working reflects the work that has been carried out in the local area.		
Five-yearly reviews of Local Plans	This was already known and anticipated.		
Reference to proportionate evidence	Resource constraints have meant that the Council have needed to aim for a proportionate evidence base in any case.		
Use of digital tools	In terms of consultation, this will apply more to future plans. The Local Plan and Proposals Map will be available online, and is capable of being presented in a different manner if new digital tools allow it.		
Statements of common ground	Although labelled as Memoranda of Understanding rather than Statements of Common Ground, this is generally approach which has been well-used in the local area. The West of Berkshire Spatial Planning Framework (OP004) is a document that could also be easily adapted to form a Statement of Common Ground.		

Table 3.5: Flexibility in relation to proposed changes in the NPPF consultation

New expectations around viability testing	The Local Plan is clear about its requirements, and these have been subject to viability testing.		
Chapter 4: Decision-making			
New approach to viability testing, including specifying where Viability Testing Reports will be required.	The Local Plan generally indicates where viability testing is required. It may be that there are circumstances where more clarity is needed. In general, there are SPDs in place on e,g, sustainable design and construction, affordable housing etc, where more detail can be set out in response to the NPPF and Planning Practice Guidance.		
Review mechanisms for developer contributions	The Local Plan does not currently include a great deal of detail on this. Generally, mos contributions are secured via CIL. SPDs on S106 or affordable housing may provide an opportunity for more clarity.		
Chapter 5: Delivering a wide choice of	high quality homes		
New standard methodology for housing need	The Government has clarified that this will not apply to plans submitted before 31 st March 2018.		
Addressing housing requirements of groups such as students, travellers and those wishing to rent	Policies in the Local Plan address student accommodation, gypsy and traveller accommodation (albeit that full needs cannot be met in Reading) and build-to- rent.		
Incorporating Ministerial Statement on affordable housing	This issue was known and is addressed in the evidence base. The Council considers there is a case for seeking affordable housing contributions from small sites.		
10% of homes for affordable home ownership on major sites.	This is not specifically referenced in the Local Plan, but H3 does not specify particular tenure splits, so the policy should be flexible to allow this		
Housing requirement for designated neighbourhood areas	There are no designated neighbourhood areas in Reading		
At least 20% of housing on small sites of less than half a hectare	Of the housing on current Local Plan allocated sites, only around 9% is on small sites of less than 0.5 ha. However, when the housing trajectory is taken as a whole including small site windfalls, significantly more than 20% would be on small sites. With the constraints that Reading has, it is inevitable that much of the housing would need to be high density on town centre sites of greater than 0.5ha, and it is difficult to envisage another strategy being adopted.		
Housing delivery test at 75% of requirement	The Plan is currently proposed to meet its requirement, as set out in the housing trajectory.		
Exception sites for entry-level homes	This applies outside settlements, so would not apply in Reading.		

Chapter 6: Building a strong, competiti	ve economy		
Supporting business growth	The Local Plan provides strong support to business growth by maintaining industrial units and meeting its needs for new floorspace.		
Changes to the rural economy section	Not relevant to Reading		
Chapter 7: Ensuring the vitality of town	n centres		
Sites to meet need for town centre uses should look at least ten years ahead	The Local Plan is sufficiently flexible to meet the full identified need		
Strengthening of sequential test	This supports the town centre first approach of the Local Plan.		
No impact assessment for out of centre offices	There are no significant implications for the Local Plan		
Chapter 8: Promoting healthy and safe	communities		
Promote benefits of estate regeneration	The Local Plan already actively pursues this e.g. at Dee Park, and policy H14 supports further proposals.		
Planning to address security threats	Not specifically addressed in Local Plan, but broadly fits in with safety being a part of CC7 on design.		
Chapter 9: Promoting sustainable trans	port		
Additional development opportunities arising from strategic transport infrastructure	There are no clear examples of this in Reading, where new infrastructure is within the existing urban area in any case		
Maximum parking standards need to be justified	Parking standards are necessary for maintaining the road network. Specific standards are not included in the Local Plan and will be set out and justified in the Parking Standards and Design SPD		
National network of aviation facilities	Not relevant to Reading		
Assessing transport impact to include highway safety	This is in line with Local Plan policy TR3		
Chapter 10: Supporting high quality co	mmunications		
Plans should set expectations for high quality digital infrastructure	This fits broadly within policy OU2		
Chapter 11: Making effective use of lar	nd		
More intensive use of land and buildings, better use of space above shops, pursuing higher density, use of brownfield land for housing	This is already central to Reading's approach, as it reflects the realities of meeting needs in an urban area.		
Minimum densities around transport hubs	Densities are not currently expressed as minima. However, the densities around transport hubs on allocated sites are set at high densities. Policy CC6 also generally reflects this approach.		
Conversion and reallocation of other uses for housing	The opportunities to do this have been assessed, and some taken forward, but it must be balanced against other identified		

	needs.		
Chapter 12: Achieving well-designed places			
Clear design vision supported by tools such as design codes	There is no reason to believe that this would conflict with the Local Plan approach.		
Chapter 13: Protecting the Green Belt			
Considerations before exceptional circumstances used in Green Belt	There is no Green Belt in Reading		
Affordable/starter homes on brownfield in Green Belt	There is no Green Belt in Reading		
Chapter 14: Meeting the challenge of c change	limate change, flooding and coastal		
Supporting measures for future resilience	The Local Plan contains policies such as CC3 and CC4 that accord with this		
Consideration of cumulative flooding impacts	The SFRA (EV025) has considered flood risk across the Borough as a whole		
Consideration of local community's views for wind energy	No significant proposals for wind energy are anticipated in Reading		
Emphasising the national technical standards	This reflects what was already known in the Ministerial Statement. The Council considers there is a strong case for zero carbon homes in Reading, and has provided evidence in this paper.		
Chapter 15: Conserving and enhancing	the natural environment		
Agent of change is responsible for mitigating impactsThis is in line with the approach of polici such as EN15-EN17			
Strengthened protection for ancient woodland and natural habitats	The two areas of ancient woodland are shown on the Proposals Map. They also fall within other protection designations, and will be preserved by the plan.		
Chapter 16: Conserving and enhancing	the historic environment		
Outstanding Universal Value of World Heritage Sites	No such sites in Reading		
Changes to wording on 'harm'	This will not affect the operation of the policies in the Local Plan		
Chapter 17: Facilitating the sustainable use of minerals			
A joint Minerals and Waste Local Plan is in preparation with Wokingham Borough Council, Bracknell Forest Borough Council and the Royal Borough of Windsor and Maidenhead. Changes to the NPPF will be taken on board in that document.			

3.9.5 The Government has proposed a standard methodology for the calculation of housing need, and this is mentioned within the draft NPPF. The current proposed methodology, which was subject to consultation, if applied using most up-to-date figures, would result in a reduction of Reading's housing need to 611 per annum. However, this is subject to considerable change, and revisions to the methodology and updated figures could result in changes. As the Local Plan has been submitted prior to 31st March 2018, the applicable level of objectively assessed need remains that from the SHMA until such time as the Local Plan is reviewed. Any changes will

need to be considered at Local Plan review stage.

3.9.6 In terms of other changes above those that have already been anticipated, there is always a chance that there may be changes that affect how part of a plan can be implemented. In a worst case scenario, this may mean the need to carry out a partial review of the Local Plan. In other cases, such as further liberalisation of changes of use, it may mean that parts of policies cannot be implemented. This will have to be addressed in future reviews.

Issues with Delivery of Housing Targets

- 3.9.7 The Local Plan makes provision in policy H1 to deliver 671 dwellings per year. The Housing Trajectory shows how this will be accommodated, through a mix of allocated sites, existing permissions and an allowance for delivery of small sites (less than 10 dwellings). The figure is expected to be challenging but ultimately deliverable.
- 3.9.8 Within development allocations, other than where there are specific sensitivities that demand a different approach, the Local Plan tries to be flexible in terms of the number of dwellings and form of development on site insofar as is possible. This should ensure that the plan is flexible enough to ensure delivery.
- 3.9.9 In overall terms, the Housing Implementation Strategy (EV012) looks in depth at the maintenance of a five-year housing land supply across the plan period. Section 6 of that document concludes that there are a range of tools that the Council could call on, and reference should be made to that document. However, in general, any issues are most likely to have arisen towards the end of the plan period, and there will have been opportunities within the five-year Local Plan reviews, based on updated 5-year land supply and Housing Trajectory work within the Council's Annual Monitoring Report, to pick up on this and address it through a review.

Issues with Delivery of Unmet Need

- 3.9.10 The identified shortfall of 644 dwellings is to be met elsewhere within the Western Berkshire Housing Market Area, in line with the Memorandum of Understanding signed in October 2017. The Local Plan commits the Council to working with neighbouring authorities on their own plans to ensure that this need is met. These Local Plans are at an earlier stage than Reading's Local Plan. Bracknell Forest Borough Council has recently consulted on a Draft Local Plan (under Regulation 18). A preferred options consultation on Wokingham's Local Plan is expected in summer 2018, whilst West Berkshire's LDS sets a timescale of undertaking Regulation 18 before November 2019.
- 3.9.11 The full picture of where Reading's unmet needs will be accommodated is therefore not likely to become clear until 2019-2020. By this stage, Reading Borough Council will need to be starting the process of undertaking a five-yearly review of its Local Plan as required by the 2017 Regulations. This will provide an opportunity to re-assess whether there are likely to be any problems in accommodating this unmet need, and make provisions accordingly.
- 3.9.12 It is also important to note that the shortfall is not expected to arise until the last ten years of the 2013-2036 period, as shown in the Local Plan Housing Trajectory. Delivery in the first part of the plan period up to 2026 is expected to fully meet the objectively assessed need for that period. There will therefore be ample opportunities within the five-yearly reviews of Reading's Local Plan, as well as plans of the other authorities, to make provision for this need, should

circumstances change.

Heathrow

- 3.9.13 The Government approved expansion of Heathrow Airport in October 2016 in order to help to meet the UK's airport expansion needs, although this will be subject to a vote in parliament expected during 2018. Heathrow are currently consulting on the physical changes necessary and on design principles, with the consultation due to end on 28th March. An application for development consent is expected to be submitted by March 2020 with a view to securing a Development Consent Order for the new runway by September 2021. Works could theoretically begin before 2025. However, very large infrastructure schemes in the past have been subject to very considerable delays due to legal wrangles, so this may be subject to substantial change.
- 3.9.14 The SHMA and EDNA on which Reading's Local Plan is based did not make an allowance for Heathrow, due to the considerable uncertainty around the issue. Therefore, the Local Plan is not predicated on expansion of Heathrow. Although Reading would not be directly affected by physical changes in the vicinity as would be the case at, for example, Slough, there is little doubt that expansion at Heathrow would be likely to increase need for housing and employment space in a wide area around West London and authorities in the area to the west, including Reading. Heathrow's consultation document estimates that around 40,000 jobs would be created in the local area.
- 3.9.15 In a practical sense, such changes in need will not necessarily make a difference to the overall picture of how Reading plans within its boundaries. The Local Plan is already planning to accommodate whatever development it has physical capacity for. Whilst there may be possible tweaks to the overall strategy on specific sites, by and large increased housing and employment needs will be likely to result in a greater amount of need that Reading has to meet outside its boundaries. The impacts on physical planning within Reading may be around infrastructure provision for any resulting urban extensions, particularly transport infrastructure, and ensuring that the type of employment provision matches any changes to the type of needs arising as a result of Heathrow.
- 3.9.16 In any case, no development at Heathrow is likely before 2025. There will have been at least one of statutory five-yearly Local Plan review before any works take place. Although increased needs would be likely to precede these works, there will still have been ample opportunity to review the strategy.

Delivery of Transport Infrastructure

- 3.9.17 Another potential set of changing circumstances to bear in mind is change to the transport schemes that make up part of the Local Transport Plan (OP005). This document covers the period to 2026, although many of the schemes discussed are longer-term.
- 3.9.18 The schemes that are particularly important to the delivery of the Local Plan are set out in policy TR2 and/or the Infrastructure Delivery Plan. Many of these (e.g. parts of Mass Rapid Transit) are underway, whilst others such as Green Park Station are funded and due to begin shortly. Others are still being progressed with partners.
- 3.9.19 However, it is also important to bear in mind that the Local Transport Plan was always intended to be a package of transport measures, allowing some flexibility in

the exact schemes that came forward. The LTP and the Local Plan do not therefore stand or fall by the delivery of one or two schemes, Work is due to begin shortly on a revision of the LTP, which will examine a range of measures.

3.9.20 The document is therefore flexible to deal with any changing circumstances around delivery of transport infrastructure.

Changing Economic Circumstances and Viability

- 3.9.21 The UK went through a prolonged recession starting in 2008, which affected development across the country. In Reading, the clearest planning-related indicator of the effects of this was a period of very low dwelling completions between 2010 and 2014, although recovery has since been strong. Therefore, the factor of changing economic circumstances must be considered.
- 3.9.22 In broad terms, one of the aims of the Local Plan should be to help to ensure that the economy of Reading is not over-reliant on one particular economic sector. Therefore, the Local Plan seeks to maintain a sufficient supply of employment land to support a variety of uses, particularly industrial and warehousing space that is often squeezed out by higher-value uses. This approach, set out in the employment section, assists in flexibility in the face of possible economic change.
- 3.9.23 Viability of individual development sites can be affected by the requirements set out in policies. The Viability Testing Report of the Local Plan requirements (EV006) looks at current levels of viability and establishes that the Local Plan requirements, together with the Council's Community Infrastructure Levy rates, can be viably delivered at the current time. This is not expected to be vulnerable to small shifts from year-to-year, but clearly a major recession may well affect the viability of development, even if there were no Local Plan requirements. In these cases, the policies usually include a reference to viability considerations being taken into account. The Council is, and has for a long time been, open to discussions on viability where requirements would genuinely prevent a viable scheme coming forward, and this is not expected to change.
- 3.9.24 The five-yearly Local Plan reviews will need to include re-testing of viability considerations to ensure that policies are not set at a level that stymies developments. In addition to this, the amendment of CIL rates can take place outside, and quicker than, the Local Plan review process and can be used as a mechanism to take account of changing viability considerations, through revision both upwards and downwards.

Climate Change

- 3.9.25 The effects of climate change are likely to make themselves felt on all areas in coming years, and certainly within the plan period of the Local Plan. The overall expected changes include higher summer temperatures and more extreme weather events such as floods and storms, which will cause social and economic impacts. There a variety of particular implications for Reading as a result of this, such as:
 - Increased flooding;
 - Greater need for shade;
 - Unreliability of energy and water supplies; and
 - Changing biodiversity patterns.
- 3.9.26 The likely effects of climate change on flooding have been identified in the Strategic Flood Risk Assessment (EV025), and the implications of this on the Local Plan have informed the Sequential and Exceptions Test (EV028), so that sites which

would become part of Flood Zone 3a after climate change are assessed on that basis.

- 3.9.27 Developments will increasingly need to be designed to be adaptable to the effects of climate change, as well as to reduce contribution to climate change. For this reason, the Local Plan includes a policy (CC3) on adaptation to climate change. This identifies measures including building orientation, planting and surface water run-off to deal with the effects of climate change. However, as well as this headline policy, a number of other policies in the document should have a beneficial effect. Policy CC4 on decentralised energy will help make major developments less reliant on external energy supplies, which may become increasingly unreliable. Policy EN14 will ensure additional tree planting, which will create much needed shade.
- 3.9.28 In terms of water shortages, all residential development within the Borough will need to comply with policy H5, which requires compliance with the more stringent water efficiency measures in the Building Regulations.
- 3.9.29 There is no certainty about the patterns of biodiversity that may emerge as a result of climate change. Some species may become more common, whilst others may become scarcer. The contribution that the Local Plan can make is to preserve those priority habitats that have been identified through the Biodiversity Action Plan, as well as preserving any corridors of wildlife movement that exist to allow for migration of populations. Policy EN12 seeks to create a continuous network of habitats and corridors, and should therefore be of assistance in allowing movement.

Conclusion

3.9.30 It is therefore considered that the Local Plan is reasonably flexible to cope with a range of changing circumstances. However, monitoring through the Annual Monitoring Report and in compliance with the monitoring framework in section 11 of the Local Plan, will keep any emerging issues under review, and should indicate where there is a need to review the plan to address these issues.

3.10. Replacement of Development Plan Document Policies

3.10.1 The Local Plan will, upon adoption, replace all policies in the existing three development plan documents (the Core Strategy (PP004), Reading Central Area Action Plan (PP005), and Sites and Detailed Policies Document (PP006)). The following schedule shows how each outstanding policy is to be replaced. Policies may not be replaced on an exact like-for-like basis, but the below table represents a broad indication of the equivalent policy.

Development plan policy to be replaced	Where and if replaced in the Local Plan	
Policy		
Core Strategy		
CS1: Sustainable Construction and Design	CC2: Sustainable Design and Construction H5: Standards for New Housing	
CS2: Waste Minimisation	CC5: Waste Minimisation and Storage	
CS3: Social Inclusion and Diversity	No direct replacement	
CS4: Accessibility and the Intensity of	CC6: Accessibility and the Intensity of	

Table 3.6: Replacement of existing development plan policies

Development plan policy to be replaced	Where and if replaced in the Local Plan		
Policy			
Development	Development		
CS5: Inclusive Access	CC7: Design and the Public Realm		
CS6: Settlement Boundary	No direct replacement		
CS7: Design and the Public Realm	CC7: Design and the Public Realm		
CS8: Waterspaces	EN11: Waterspaces		
CS9: Infrastructure	CC9: Securing Infrastructure		
CS10: Location of Employment Development	EM2: Location of New Employment Development		
CS11: Use of Employment Land for Alternative Uses	EM3: Loss of Employment Land		
CS12: Maintaining a Variety of Premises	EM4: Maintaining a Variety of Premises		
CS13: Impact of Employment Development	CC9: Securing Infrastructure		
CS14: Provision of Housing	H1: Provision of Housing		
CS15: Location, Accessibility, Density and Housing Mix	H2: Density and Mix		
CS16: Affordable Housing	H3: Affordable Housing		
CS17: Protecting the Existing Housing Stock	H7: Protecting the Existing Housing Stock		
CS18: Residential Conversions	H8: Residential Conversions		
CS19: Provision for Gypsies and Travellers	H13: Provision for Gypsies and Travellers WR4: Potential Traveller Transit Site at Cow Lane		
CS20: Implementation of the Reading Transport Strategy (Local Transport Plan 2006-2011)	TR1: Achieving the Transport Strategy		
CS21: Major Transport Projects	TR2: Major Transport Projects		
CS22: Transport Assessments	TR1: Achieving the Transport Strategy		
CS23: Sustainable Travel and Travel Plans	TR1: Achieving the Transport Strategy		
CS24: Car/Cycle Parking	TR5: Car and Cycle Parking and Electric Vehicle Charging		
CS25: Scale and Location of Retail, Leisure and Culture Development	RL2: Scale and Location of Retail, Leisure and Culture Development		
CS26: Network and Hierarchy of Centres	RL1: Network and Hierarchy of Centres		
CS27: Maintaining the Retail Character of Centres	RL3: Vitality and Viability of Smaller Centres CR7: Primary Frontages in Central Reading		
CS28: Loss of Open Space	EN7: Local Green Space and Public Open Space EN8: Undesignated Open Space		
CS29: Provision of Open Space	EN9: Provision of Open Space		
CS30: Access to Open Space	EN10: Access to Open Space		
CS31: Additional and Existing Community Facilities	OU1: New and Existing Community Facilities		
CS32: Impacts on Community Facilities	CC9: Securing Infrastructure		
CS33: Protection and Enhancement of the Historic Environment	EN1: Protection and Enhancement of the Historic Environment EN2: Areas of Archaeological Significance		

Development plan policy to be replaced	Where and if replaced in the Local Plan		
Policy			
	EN4: Locally Important Heritage Assets		
CS34: Pollution and Water Resources	EN15: Air Quality EN16: Pollution and Water Resources EN17: Noise Generating Equipment		
CS35: Flooding	EN18: Flooding and Drainage		
CS36: Biodiversity and Geology	EN12: Biodiversity and the Green Network		
CS37: Major Landscape Features and Strategic Open Space	EN13: Major Landscape Features and Areas of Outstanding Natural Beauty EN7: Local Green Space and Public Open Space		
CS38: Trees, Hedges and Woodlands	EN14: Trees, Hedges and Woodland		
Reading Central Area Action Plan			
RC1: Development in the Station/River Major Opportunity Area	CR11: Station/River Major Opportunity Area		
RC2: Development in the West Side Major Opportunity Area	CR12: West Side Major Opportunity Area		
RC3: Development in the East Side Major Opportunity Area	CR13: East Side Major Opportunity Area		
RC4: Other Opportunity Sites	CR12: West Side Major Opportunity Area CR14: Other Sites for Development in Central Reading		
RC5: Design in the Centre	CR2: Design in Central Reading		
RC6: Definition of the Centre	CR1: Definition of Central Reading		
RC7: Leisure, Culture and Tourism in the Centre	CR4: Leisure, Culture and Tourism in Central Reading RL6: Protection of Leisure Facilities and Public Houses		
RC8: Drinking Establishments	CR5: Drinking Establishments in Central Reading		
RC9: Living in the Centre	CR6: Living in Central Reading		
RC10: Active Frontages	CR7: Primary Frontages in Central Reading		
RC11: Small Shop Units	CR8: Small Shop Units in Central Reading		
RC12: Terraced Housing in the Centre	CR9: Terraced Housing in Central Reading		
RC13: Tall Buildings	CR10: Tall Buildings		
RC14: Public Realm	CR3: Public Realm in Central Reading EN7: Local Green Space		
Sites and Detailed Policies Document			
SD1: Presumption in Favour of Sustainable Development	CC1: Presumption in Favour of Sustainable Development		
DM1: Adaptation to Climate Change	CC3: Adaptation to Climate Change		
DM2: Decentralised Energy	CC4: Decentralised Energy		
DM3: Infrastructure Planning	CC9: Securing Infrastructure		
DM4: Safeguarding Amenity	CC8: Safeguarding Amenity		
DM5: Housing Mix	H2: Density and Mix		
DM6: Affordable Housing	H3: Affordable Housing		
DM7: Accommodation for Vulnerable People	H6: Accommodation for Vulnerable People		
DM8: Residential Conversions	H8: Residential Conversions		
DM9: House Extensions and Ancillary	H9: House Extensions and Ancillary Accommodation		

Development plan policy to be replaced	Where and if replaced in the Local Plan		
Policy			
Accommodation			
DM10: Private and Communal Outdoor Space	H10: Private and Communal Outdoor Space		
DM11: Development of Private Residential Garden Land	H11: Development of Private Residential Gardens		
DM12: Access, Traffic and Highway- Related Matters	TR3: Access, Traffic and Highway-Related Matters		
DM13: Vitality and Viability of Smaller Centres	RL3: Vitality and Viability of Smaller Centres		
DM14: Impact of Main Town Centre Uses	RL5: Impact of Main Town Centre Uses		
DM15: Protection of Leisure Facilities and Public Houses	RL6: Protection of Leisure Facilities and Public Houses		
DM16: Provision of Public Open Space	EN9: Provision of Open Space		
DM17: Green Network	EN12: Biodiversity and the Green Network		
DM18: Tree Planting	EN14: Trees, Hedges and Woodland		
DM19: Air Quality	EN15: Air Quality		
DM20: Hazardous Installations	OU2: Hazardous Installations		
DM21: Telecommunications Development	OU3: Telecommunications Development		
DM22: Advertisements	OU4: Advertisements		
DM23: Shopfronts and Cash Machines	OU5: Shopfronts and Cash Machines		
SA1: South Reading Development Principles	No direct replacement - see South Reading key principles		
SA2: South Reading Strategic Development Sites	SR1: Island Road Major Opportunity Area SR2: Land North of Manor Farm Road Major Opportunity Area SR3: South of Elgar Road Major Opportunity Area SR4: Other Sites for Development in South Reading		
SA3: Retail, Leisure and Culture Uses in South Reading	RL2: Scale and Location of Retail, Leisure and Culture Development		
SA4: Dee Park	WR1: Dee Park		
SA5: Park Lane Primary School, The Laurels and Downing Road	WR2: Park Lane Primary School, The Laurels and Downing Road		
SA6: Whiteknights Campus, University of Reading	ER2: Whiteknights Campus, University of Reading		
SA7: Crescent Road Campus	No replacement - development completed		
SA8: Other Sites for Housing Development	CR11: Station/River Major Opportunity Area SR4: Other Sites for Development in South Reading WR3: Other Sites for Development in West Reading and Tilehurst CA1: Sites for Development in Caversham and Emmer Green ER1: Sites for Development in East Reading		
SA9: Other Sites for Mixed Use Development Including Housing	WR3: Other Sites for Development in West Reading and Tilehurst ER1: Sites for Development in East Reading		
SA10: Other Sites for Leisure Development	SR5: Leisure and Recreation Use of the Kennetside Areas		

Development plan policy to be replaced	Where and if replaced in the Local Plan	
Policy		
SA11: Settlement Boundary	No direct replacement	
SA12: Core Employment Areas	EM2: Location of New Employment Development	
SA13: Transport Improvements	TR2: Major Transport Projects	
SA14: Cycle Routes	TR4: Cycle Routes and Facilities	
SA15: District and Local Centres	RL1: Network and Hierarchy of Centres	
SA16: Public and Strategic Open Space	EN7: Local Green Space and Public Open Space	
SA17: Major Landscape Features	EN13: Major Landscape Features and Areas of Outstanding Natural Beauty	

3.10.2 There are some other policies applying in Reading with development plan weight under the Town and Country Planning Act 1990, in the Replacement Minerals Local Plan and the Waste Local Plan which are still officially saved, although in some cases they are significantly out of date. These policies are unaffected by the Local Plan, and will be replaced by a new Central Berkshire Minerals and Waste Local Plan, work on which is underway.

4. BACKGROUND TO SPECIFIC POLICIES

- 4.0.1 This section takes each policy in turn, and summarises the relevant background to how the policy has been formulated, including national policy, facts and figures and other considerations. In each case, the following sections describe why reasonable alternative options (which correspond to those options assessed through the Sustainability Appraisal process) have been rejected.
- 4.0.2 In some cases, much of the background is in another document that makes up part of the evidence base, and where this is the case, the below sections do not seek to repeat it. This is particularly the case for site allocations, where generally the Housing and Economic Land Availability Assessment (EV014 and EV015) looks at each site in depth in terms of its suitability, availability and achievability, and generally sites that are identified as being deliverable, developable or potentially developable in the HELAA are brought forward as allocations, unless they are already covered by a planning permission that is expected to be implemented.

4.1 Presumption in Favour of Sustainable Development (CC1)

4.1.1 Key Considerations

- The NPPF centres on a presumption in favour of sustainable development, which "should be seen as a golden thread running through both plan-making and decision-taking". For Local Plans, this entails seeking to meet the development needs of their areas unless "this would mean any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole" or "specific policies in this Framework indicate development should be restricted" (paragraph 14).
- This presumption needs to be reflected at the forefront of Local Plans. A model policy, or variant of it, is now a prerequisite to a plan being found sound. The Sites and Detailed Policies Document (PP006) contains an existing policy SD1 (Presumption in Favour of Sustainable Development), based on the model policy, and there is not considered to be any reason to change this approach.

4.1.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

- CC1(i) No policy REJECTED This option would fail to reflect the presumption of sustainable development as set out in the NPPF.
- CC1(ii) Presumption in favour of sustainable development PROPOSED OPTION

This option would continue the current approach, which has previously been considered at examination and judged to reflect the presumption in favour of sustainable development in the NPPF.

4.2 Sustainable Design and Construction (CC2)

4.2.1 Key Considerations

- The NPPF states that planning must play an environmental role by protecting and enhancing our natural environment through "using natural resources prudently, minimising waste and pollution and mitigating and adapting to climate change including moving to a low carbon economy." It states that Local Planning Authorities should plan for new development that reduces greenhouse gas emissions, support energy efficiency improvements to existing buildings and set local building requirements that are consistent with the Government's policies.
- New development has an important role in reducing environmental harm. The amount of new development proposed to take place in Reading has potential to increase consumption of natural resources, CO₂ emissions and energy consumption, thus contributing toward climate change. These impacts can be minimised by requiring developments to meet high environmental standards in terms of materials, energy and water use, ecology, waste and emissions.
- A Climate Change Strategy for Reading was prepared in 2013 (OP007), to cover the period to 2020. This notes good progress in terms of reducing Reading's carbon footprint between 2007 and 2012, against the background of Reading's first climate change strategy. The headline of the Climate Change Strategy is to reduce its carbon footprint by 34% by 2020 compared to 2005 levels. In terms of specific objectives for low-carbon development, the Climate Change Strategy sets out the following:
 - "Buildings in Reading to be built to high standards of energy efficiency incorporating on-site renewable energy where possible;
 - Retrofit energy efficiency measures into Reading's buildings;
 - Improve properties to reduce fuel poverty in Reading;
 - Enable the uptake of Green Deal and associated grants in Reading;
 - Minimise the 'embodied carbon' incorporated in construction projects;
 - Continue to develop planning policies that:
 - support the reduction of greenhouse gas emissions directly and indirectly from the borough
 - reduce the risks of climate change to the communities of Reading"
- There is an existing policy in the Core Strategy (PP004) (CS1) which applies to all types of new development, including redevelopment and refurbishment of existing building stock, including housing. As well as setting out general principles, it requires some specific standards in terms of sustainable design and construction. However, sustainability in buildings has moved on some way since the Core Strategy was drafted, and some elements are out of date. References to EcoHomes, for instance, were superseded very shortly after the Core Strategy was submitted, and the reference to offsetting at least 20% of carbon dioxide emissions has also been superseded by changes to the Building Regulations. In more general terms, building to high standards of sustainability is now a much more common expectation amongst the development industry, and is often expected by occupiers.
- Both the existing Core Strategy policy and proposed policy CC2 propose requirements for non-residential development and residential conversion using

the BREAAM standard. BREEAM is a well-established method of assessing and certifying the sustainability of buildings. The Core Strategy policy requires that all new commercial developments meet the BREEAM 'Very Good' standard as a minimum, and that 50% of the provision on major developments meets 'Excellent' standard. There have not been particular difficulties in achieving these standards for most forms of building, and the indications are that higher BREEAM standards can be comfortably achieved for most forms of development, including offices. Developments in Reading tend to already have something of a head start in achieving high BREEAM scores as they are located on sites that tend to be well-served by non-car transport modes. However, there are some forms of development where experience suggests that meeting standards can be more challenging, and these tend to include warehouses and schools for instance.

- Policy H5 proposes sustainable design and construction requirements for newbuild residential development, and specific standards are therefore dealt with elsewhere, although the more general principles of CC2 apply to residential as well.
- 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 prepared to supplement this policy and Policies CC3, CC4 and H5.

4.2.2 Policy Options

•

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

CC2(i) No policy - REJECTED Not including a local-level planning policy would fail to meet the requirements of the NPPF and likely increase Reading's contributions to climate change through emissions, water and energy use, materials and waste.

• CC2(ii) Continue existing policy - REJECTED

This option would contribute to climate change goals somewhat, but not the extent of option (iii). Because the BREEAM standards give high scores to development in urban areas that use previously development land and are close facilities and transport, it is possible under this option for development in Reading to achieve BREEAM 'very good' without making a significant effort to reduce waste or emissions. A number of other elements of the policy are now some way out of date.

• CC2(iii) Increase the BREEAM levels required - PROPOSED OPTION Requiring higher BREEAM levels will significantly contribute to achieving Reading's emissions targets, as well as mitigating the local effects of climate change. Given the anticipated level of growth in the Borough in the coming years, it is imperative that new development is as environmentally sustainable as possible.

4.3 Adaptation to Climate Change (CC3)

4.3.1 *Key Considerations*

• The NPPF states that planning plays an important role in minimising the vulnerability of developments and building in resilience to the impacts of

climate change including flood risk, rising temperatures, water supply impacts and changes to biodiversity and landscape. Adaptation measures form a key part of environmental sustainability.

- Adaptation measures, including green infrastructure, help to improve the quality of life for those living and working in the Borough. The effects of climate change are expected to increase over time with impacts such as more intense rainfall and flooding, heatwaves, droughts and increased risk of subsidence. These impacts will affect homes and business, as well as essential services such as transport, healthcare, water supply and energy. There will also be significant impacts on biodiversity and the natural environment.
- The Strategic Flood Risk Assessment (EV025) examines scenarios for the effects of climate change on fluvial flood risk, and finds a number of areas, particularly around Central Reading, where flood risk would worsen due to climate change. However, this is only one element of flood risk, and increasing surface water and groundwater flooding are likely, along with the other issues identified above.
- There is an existing policy in the Sites and Detailed Policies Document (PP006) (DM1) that applies to all development. The policy has been implemented effectively and in combination with other sustainability policies has resulted in more major applications with sustainability requirements applied. The elements of the policy are measures that can be designed into a development from the outset.
- This policy should be applied in tandem with other policies detailing climate change adaptability, particularly CC2: Sustainable Design and Construction and EN18: Flooding and Sustainable Drainage Systems.

4.3.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• CC3(i) No policy - REJECTED

This approach would rely on other sustainability policies (particularly CC2) and would result in positive impacts, but not to the extent of a separate policy providing detail specific to adaptation for climate change. This would be a missed opportunity for the Council to reinforce its commitment to sustainable development throughout the plan period.

CC3(ii) Continue existing policy - PROPOSED OPTION

Relying on the existing policy would continue to bring positive effects against the local impacts of climate change. This policy requires developers to consider specific measures that may not be considered under other sustainability policies. Where these measures are not appropriately incorporated, the wording of the policy will allow for planners to consider whether or not this would contribute to a reason for refusal. Thus, developers will be more likely to consider the specific adaptation measures listed in the policy at the outset of development and result in more sustainable development across the Borough.

4.4 Decentralised Energy (CC4)

4.4.1 Key Considerations

- The NPPF states that in order to increase the use and supply of renewable and low carbon energy, local planning authorities should design policies to maximise renewable and low carbon energy and identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems. Decentralised energy is seen as having a key role in the shift to sustainable energy consumption and production and covers a wide range of technologies that reduce dependence on a centralised electricity transmission network or gas grid.
- Feasibility studies commissioned by Reading Borough Council have identified potential opportunities for district heat provision, particularly within the town centre. This considers both existing and likely new development as currently allocated, particularly parts of the major opportunity areas. Given the mixed nature and size of schemes proposed in Central and South Reading, it is likely that requirements for decentralised energy would apply mainly to major developments in these areas.
- It is considered that any policy detailing requirements for energy provision should be worded with flexibility to allow for changes in technology in the near future. For example, policies refer to decentralised energy generally rather than referring to specific technologies.
- An existing policy in the Sites and Detailed Policies Document (PP006) (DM2) works in tandem with other sustainability policies to require developers to consider inclusion of decentralised energy production sites or infrastructure for units to link into a decentralised source in the future.

4.4.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• CC4(i) No policy - REJECTED

This option would result in some positive effects and rely on guidance in the Buildings Regulations and other Local Plan policies, such as CC1, CC2 and H5, but not to the extent of option (ii). Omission of a decentralised energy policy would be a missed opportunity for Reading Borough Council to require steps that would contribute to meeting larger climate change related targets.

• CC4(ii) Continue existing policy - PROPOSED OPTION

This option would continue to require developers to consider inclusion of decentralised energy infrastructure. This will increase the amount of decentralised energy provision in the Borough more so than would reliance of the Building Regulations.

• CC4(iii) Defer the building regulations - REJECTED

The effects of this option are similar to that of the first in that some positive effects would be achieved, but not to the extent of the proposed option. A policy directing developers to the building regulations for climate change adaptation guidance would draw more attention to the subject than option (i), but would not provide sufficient detail.

4.5 Waste Minimisation and Storage (CC5)

4.5.1 *Key Considerations*

- The NPPF emphasises the importance of material reuse and waste minimisation, stating the Local Planning Authorities should help to minimise waste as part of achieving environmental sustainability.
- The National Planning Policy for Waste (October 2014) provides specific guidance regarding planning's role in delivering sustainable waste management. It identifies key planning objectives including ensuring that the design and layout of new development supports sustainable waste management.
- The Council has a Waste Minimisation Strategy 2015-2020¹⁴ in place. This identifies three main objectives:
 - Objective 1. To reduce the net cost of waste
 - Objective 2. To recycle > 50% by 2020
 - Objective 3. To support and communicate

Many of the specific actions identified within the strategy relate to detail of the waste management service. However, there are some important issues with a planning relevance, such as the need to increase recycling rates and reduce contamination from waste in flats.

- A Joint Minerals and Waste Local Plan for Reading Borough Council, Wokingham Borough Council, Bracknell Forest Borough Council and the Royal Borough of Windsor and Maidenhead is in preparation and will cover the waste planning needs for the area. The Sustainable Design and Construction SPD, adopted in 2011, contains more detail on waste minimisation measures.
- Existing Core Strategy (PP004) policy CS2 has been used successfully in tandem with other sustainability policies to require developers to consider inclusion of waste storage facilities and to encourage sustainable waste practices during construction and demolition.

4.5.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• CC5(i) No policy - REJECTED

This option would rely on EU and national policy (e.g. Landfill Directive), but would miss an opportunity to provide detail regarding waste minimisation in construction and demolition, as well as inclusion of proper waste storage in new developments.

CC5(ii) Continue existing policy - PROPOSED OPTION
 Continuing with the existing policy would reinforce and emphasise EU and
 national policy and lead to positive effects by facilitating waste storage, reuse
 and recycling. This would help to achieve the aims outlined in the Council's
 Waste Minimisation Strategy 2015-2020.

¹⁴ <u>http://www.reading.gov.uk/media/4418/Waste-Minimisation-Strategy-2015----</u> 2020/pdf/HNL 15th March WMStrategy Revision Appendix B.pdf

4.6 Accessibility and the Intensity of Development (CC6)

4.6.1 *Key Considerations*

- The NPPF states that a core planning principle is to "actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable" (paragraph 17).
- This is further underlined later in the NPPF, with paragraph 34 stating that "Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised."
- Consultation on changes to national planning policy in December 2015 suggested changes to be made to the NPPF to require local authorities to plan for high density residential development around commuter hubs. Commuter hubs would be defined as public transport interchanges and locations with a frequent service running at least every 15 minutes during normal commuting hours. There would be a number of locations in Reading that this would apply to. This change to policy forms part of recent proposed revisions to the NPPF.
- The most recent Local Transport Plan (2011-2026; OP005) includes as a strategic objective the need to align transport and land use planning to enable sustainable travel choices, improve mobility, reduce the need to travel and preserve the natural environment.
- Levels of accessibility in Reading are generally high, which means there are few, if any, locations where any development would be inappropriate due to its remoteness. The town centre is one of the most accessible locations in the South East, underscored by recent station improvements, and Reading is crossed by a network of high quality bus routes. The town lies on national cycle network routes, and much of the Borough is highly accessible by foot. Investment in sustainable transport measures continues, including the ongoing work on mass rapid transit.
- There is an existing policy in the Core Strategy (PP004) on this matter (CS6), which has been well-used in establishing appropriate levels of development on different sites in Reading over the last ten years.

4.6.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• CC6(i) No policy - REJECTED

This option would fail to reflect national policy which clearly links transport and accessibility, and also fail to reflect the direction of emerging policy on commuter hubs. It could mean that development fails to adequately consider accessibility levels, and could lead to less efficient use of accessible land in some cases, and inappropriate increases in car travel in other cases.

• CC6(ii) Scale and density must relate to accessibility - PROPOSED OPTION This option would continue a policy approach which has been effective in dictating the overall pattern of development since the adoption of the Core Strategy, establishing an overall development principle which is clear and easily understood. It reflects national policy and allows the development of appropriate parameters for site allocations within the plan.

4.7 Design and Public Realm (CC7)

4.7.1 Key Considerations

- The NPPF states that good design is a key aspect of sustainable development and is an integral part of good planning. Well-designed individual buildings, public and private spaces and area development schemes should contribute positively to a strong sense of place. Good design can support local facilities and transport, create safe communities and reflect local character and history. Good design serves to improve the quality-of-life for Reading's residents.
- Reading contains many established and attractive areas which should be protected against poorly-designed development that would damage the built environment. Proposals must be of an appropriate scale, density and design that maintains and enhances the area of Reading in which it is located.
- Policy CR2 prescribes more detailed requirements for design within Central Reading. This area requires specific detail because it contains the highest concentration of heritage assets in the Borough, as well as the highest density of residents and mix of uses. Good design in this area is increasingly important, particularly as densities increase and development intensifies.
- There is an existing policy in the Core Strategy (PP004) (CS7) which applies to all development and has been well-used in influencing design and determining applications. All major applications, or other relevant developments, will continue to be accompanied by a design and access statement that will be assessed against the criteria in this policy.

4.7.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• CC7(i) No policy - REJECTED

The absence of local planning policy would make it difficult for the Borough to communicate design objectives and guidelines applying specifically to the built environment of Reading. This option would give little clarity to applicants and would likely result in inconsistency in determining planning applications, with some proposals giving rise to poorly-designed developments that would degrade the character and quality of Reading's built environment.

CC7(ii) Continue existing policy - PROPOSED OPTION

The approach involves continued reliance upon the existing Local Plan. The approach would be effective in promoting high quality design outcomes in the relevant areas. This policy will allow good design to be consistently delivered through development management.

4.8 Safeguarding Amenity (CC8)

4.8.1 Key Considerations

- The NPPF states that a core planning principle is to ensure a good standard of amenity for existing and future occupants of land;
- Reading has a residential density of 38.5 people per hectare according to the 2011 Census, the 15th highest in England and Wales outside London, and the 4th

highest in the South East. This high population density means that the amenity of existing residents arises as an issue for almost all development proposals.

- Reading also has a very large and thriving centre, a number of smaller centres and substantial employment areas including a variety of ages and types of premises. It also has a number of smaller employment and commercial uses distributed within the residential areas, particularly the inner urban areas, where uses tend to be mixed both vertically and horizontally.
- There is an existing policy in the Sites and Detailed Policies Document (PP006) on Safeguarding Amenity (DM4), which applies to all types of development and which has been well-used in determining applications in recent years. Previously, in the 1998 Local Plan, amenity considerations had been set out in a wide number of policies throughout the plan.

4.8.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• CC8(i) No policy - REJECTED

This option would fail to ensure that residential amenity considerations are adequately taken into account, as guidance in the NPPF and other policies alone would not be sufficient

• CC8(ii) Continue existing policy - PROPOSED OPTION

This option would continue a policy approach which has been effective in ensuring that developments take amenity considerations into account. There are some minor alterations needed to fill gaps, for instance to ensure that wind is taken into account when buildings exceed a certain height, but this is evolution of the existing approach.

4.9 Securing Infrastructure (CC9)

4.9.1 Key Considerations

- The NPPF emphasises that provision of infrastructure is a key part of building a strong, responsive and competitive economy. Planning policies should seek to address potential barriers to investment including lack of infrastructure and identify specific areas of infrastructure enhancement and provision. Infrastructure includes the structures and facilities needed for transport, telecommunications, waste management, water supply, wastewater, flood risk, minerals and energy, as well as community and cultural infrastructure such as healthcare, education, security, recreation space and biodiversity networks.
- The Local Plan includes an Infrastructure Delivery Schedule (Figure 10.2) which outlines the infrastructure necessary to support growth throughout the plan period. This schedule is accompanied by an Infrastructure Delivery Plan (EV007) that explains each category of infrastructure in turn and describes the strategy, existing provision, capacity issues, the impact of future growth and priorities for meeting need. Development proposals are expected to mitigate all relevant impacts in accordance with criteria and rate of contribution and/or levy, taking account of levels of development that have already been accepted and any mitigation measures agreed or implemented. In some cases it will not be possible for reasons of viability for development to mitigate all relevant

impacts. Thus, the Council will take into account the priorities listed in Policy CC9.

- The Community Infrastructure Levy (CIL) allows local authorities to raise funds from owners or developers of land undertaking new building projects in the area. CIL was implemented in Reading on 1 April 2015, and the CIL Charging Schedule makes up part of the evidence base (PP009). Most of the contributions that would previously have been sought under Section 106, such as towards transport, education and leisure and open spaces, are now covered by CIL unless there are site-specific requirements (e.g. a new primary school at Green Park). The Regulation 123 list (PP013) sets out the full range of infrastructure items that will be funded by CIL.
- Since CIL has been relatively recently introduced, the amount of money that has so far been collected is relatively limited. Between 1st April 2015 and 31st March 2017, £2.17 million has been collected, and so far £0.91 million has been spent. The Annual Monitoring Report, published in December each year, details collection, spend and retention of CIL.
- With the introduction of CIL, the role of Section 106 agreements has changed. Generally, they are now used to contribute towards items that do not count as 'infrastructure', or towards site-specific infrastructure needs. In recent schemes, Section 106 agreements primarily deal with collection of contributions towards affordable housing and the completion of Employment and Skills Plans, alongside any non-financial agreements, and this means that total financial contributions agreed in new S106s declined from £11.23 million in 2014-15 to £4.7 million in 2015-16. A new Supplementary Planning Document on Section 106 agreements was introduced to accompany CIL in 2015, and this continues to have effect in relation to this policy. This provide more information on the scale and form of obligation, the financial contribution sought, the role of pooled payments, maintenance payments and charges for preparing agreements.
- In general, it is strongly believed that the use of CIL results in less infrastructure contributions overall than pooled Section 106 contributions did. This reflects the fact that most sites in Reading are previously developed and often in-use, and this can mean that viability can vary quite significantly from site to site. The one-size -fits-all approach of CIL therefore results in reduced contributions being available.
- Existing policies within the Sites and Detailed Policies Document (PP006) and the Core Strategy (PP004) (DM3: Infrastructure Planning; CS9: Infrastructure, Services, Resources and Amenities; CS13: Impact of Employment Development and CS32: Impacts of Community Facilities) have been implemented successfully to require developer contributions for infrastructure and allowed for planning applications to be determined expeditiously. The Submission Local Plan combines the elements of the four existing policies into a single policy, CC9: Securing Infrastructure.
- In terms of employment development, Reading's tight labour market means that there is a gap between the numbers of economically active people in the job market and the numbers of jobs in the area. Further employment development that is not already accounted for within the figures that underpin both the Strategic Housing Market Assessment (EV011) and the Economic Development Needs Assessment (EV009) will add to that gap, leading to pressure on local housing from employees moving to the area to be near to their jobs, and therefore on the affordability of housing, and/or long distance

commuting. Such development is not therefore sustainable unless it is appropriately mitigated. The Council has therefore long, and successfully, sought contributions from major employment development towards affordable housing, dating back to at least 2000, and carried through in the Berkshire Structure Plan and to policy CS9 of the Core Strategy.

- The link between employment need and housing need is clear, and this is one • of the reasons why the level of employment development planned for is a key element of determining objectively assessed housing needs, as it is in the Berkshire SHMA (EV011). Consideration of economic need based on employment forecasts led to an uplift of 33 dwellings per year in Reading over the demographic need in the SHMA. This issue is illustrated even more starkly in the Western Berkshire OAN Sensitivity Testing (EV034). Table 33 of that document shows how a range of employment forecasts impact upon housing need, and, depending which forecasts are used, a very wide range of housing needs from 582 to 931 per annum can be generated for Reading. That report eventually identifies an economic-led figure of 759 dwellings per annum, which represents an uplift of 217 dwellings per annum over demographic need. This illustrates perfectly the difference that anticipated employment growth can make, and why mitigation of impacts is required. Please refer to section 4.32 for the Council's comments on the status of this OAN Sensitivity Testing.
- The Affordable Housing SPD (adopted 2013) sets a threshold of 2,500 sq m of additional office development (or equivalent for other uses based on employment densities), and contains a methodology for calculating the appropriate level of provision, as follows:
 - 1. Calculation of additional floorspace divided by the density of employment for that use and location;
 - 2. Multiply by 50%, allowing for flexibilities and capacities in the local market to estimate the net increase in employment that will add to the employment gap;
 - 3. Divide by 1.317 (factor for number of jobs/households) to determine how many households that level of employment will result in.
 - 4. Multiply by x% to estimate the number of affordable housing units that should be provided to mitigate the impact (subject to scheme viability assessment).
 - 5. Calculate the contribution based on the average cost for an RSL to provide a single unit of affordable housing in Reading (at 2013, this was £80,000).

The Affordable Housing SPD is likely to need review in the light of the new Local Plan, and this will be an appropriate place to consider the degree to which this calculation remains valid, but it is important that the overall policy retains the principle of significant employment development contributing towards affordable housing.

4.9.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

 CC9(i) No policy - REJECTED Strategic infrastructure is critical to achieving the aims of the local plan, most critically housing provision and economic growth. The omission of a policy to secure infrastructure would render the plan unsound and bring negative effects with regard to almost all sustainability objectives.

- CC9(ii) Continue existing policy PROPOSED OPTION
 It is considered that the rate of development in Reading will require high levels
 of provision of infrastructure, services and facilities. Planning obligations must
 also support the role of planning in achieving sustainable development by
 mitigating any negative impacts. Thus, this approach, which has been used
 effectively for many years, provides sufficient guidance to ensure
 infrastructure delivery.
- CC9(iii) New policy with additional priorities REJECTED This option would expand the range of infrastructure priorities, but may lead to the highest priorities being neglected in a time of limited resources. Expanded infrastructure priorities may lead to greater competition for limited funding and bring negative effects overall.
- 4.10 Protection and Enhancement of the Historic Environment (EN1) See Historic Environment Background Paper (EV024)
- 4.11 Areas of Archaeological Significance (EN2) See Historic Environment Background Paper (EV024)
- 4.12 Enhancement of Conservation Areas (EN3) See Historic Environment Background Paper (EV024)
- 4.13 Locally Important Heritage Assets (EN4) See Historic Environment Background Paper (EV024)
- 4.14 Protection of Significant Views with Heritage Interest (EN5) See Historic Environment Background Paper (EV024)
- 4.15 New Development in a Historic Context (EN6) See Historic Environment Background Paper (EV024)
- 4.16 Local Green Space (EN7) See Local Green Space and Public Open Space Background Paper (EV033)
- 4.17 Undesignated Open Space (EN8)
- 4.17.1 Key Considerations
 - Although highlighting the particular importance of Local Green Space, the NPPF in paragraph 74 recognises the need for a presumption against loss of open space unless certain criteria are fulfilled. The three caveats in paragraph 74 are that:
 - "an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss."
- The Local Green Spaces and public open spaces identified in policy EN7 are those of greatest importance. However, this does not mean that all other spaces should be lost wholesale, as this would result in a considerable reduction in the accessibility to open spaces, and end up putting more pressure on those spaces that are designated as a result. In turn, this could lead to an erosion of the special characteristics such as their beauty and tranquillity that made them worthy of designation in the first place.
- It is estimated that around 910 ha of open space (including inaccessible space in private ownership) is not designated within policy EN7 as Local Green Space or Public Open Space, which represents around 72% of all open space in the Borough, although some of these spaces may have other designations such as biodiversity or landscape. This indicates that there is a very considerable amount of space where there is a need for a policy approach to deal with any potential development proposals.
- Policy CS28 of the Core Strategy (PP004) contains a presumption in favour of the retention of all open spaces, whether designated or not, other than in exceptional circumstances. This has been a popular policy approach among local residents, and there is no indication that it has led to past difficulties in meeting Reading's development targets.

4.17.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• EN8(i) No policy - REJECTED

This option would result in a policy gap, in that it would fail to set out any clarity on how to deal with loss of undesignated open space, and would mean reliance on NPPF paragraph 74.

- EN8(ii) Policy requiring retention of open space REJECTED This approach would amount to a strong protection of all open spaces, whether of particular significance or not. As such, it would go considerably beyond the policy of the NPPF, which allows loss in certain circumstances, and would be likely to have a detrimental effect on meeting development needs, in particular for housing. It would also potentially undermine the protection of those areas of greatest significance, as there would be no practical difference in the approach from EN7.
- EN8(iii) Policy containing a presumption in favour of retention of open space, but allows for replacement provision in exceptional circumstances -PROPOSED OPTION

There is a need for the policy to strike a balance between retaining open spaces wherever possible, but allowing their loss where it can be justified through replacement of the space or upgrade of existing spaces. This reflects the NPPF, whilst not containing a blanket prevention of appropriate development that could help to meet local needs.

4.18 Provision of Open Space (EN9)

4.18.1 Key Considerations

• The NPPF places considerable value on the provision of open space. Paragraph 73 states that:

"Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required."

- The Council produced a full Open Spaces Strategy in 2007 (EV021), which was used to inform the development of planning policies in the Core Strategy and Sites and Detailed Policies Document. This looks in detail at the amount, quality and accessibility of open space in Reading. Broadly, it found that:
 - Access: the distribution of POS leaves some areas underprovided. In central Reading, POS is where residents are not. Areas immediately to the west, north-west, south and east of the town centre are amongst the most poorly supplied in the Borough and the problem is exacerbated by very dense housing.
 - Quality: some existing parks and open spaces are of poor quality.
 - Green links: open spaces are fragmented and wildlife corridors are incomplete.
- In response to the issues it identified, the OSS included a strategy for open space, which included in particular a new provision standard for Reading to use as a benchmark for considering open space provision. This was incorporated into policy DM16 of the Sites and Detailed Policies Document, and is set out in Figure 4.1 below.
- The Open Spaces Strategy is now over ten years old, and the Council has received representations, particularly from Sport England, with the contention that relying on a document of this age does not fulfil the requirements of paragraph 73. However, changes to open spaces on the ground since publication of the OSS have been limited. Therefore, the Council undertook an update of the 2007 OSS, looking at changes that have taken place since the OSS, both on the ground in terms of gains, losses or qualitative changes, and in terms of changing policies or other contextual matters. This Update Note (EV022) was finalised in 2018. More detail is included within that note, but broadly it concludes that:
 - Although planning policy documents have changed, the overall approach of local and national policy remains the same;
 - There has been a small increase in the amount of recreational public open space in the last ten years; and
 - Access to open space has slightly increased with a slightly greater proportion of Reading falling within a 400m buffer of recreational open space, and with some severance lines in the town centre being overcome, but the key findings of the 2007 Strategy remain.

Therefore, it is considered that the OSS, when considered alongside its 2018 Update, remains a robust basis for policy in the new Local Plan.

	Description	Size	Transport mode	Radial catchment
Borough park	Varied character and facilities; open parkland, natural, formal, sport, play and relaxation; catering	60 ha	Car; public transport; cycle	
District parks	Varied character and facilities (but fewer than above); natural, formal, sport, play and relaxation	20 ha	Car; bus; cycle; foot	1.2 km
Local parks	Relaxation, play and ball games	2 ha or 1- 2 ha equipped	Cycle; foot; wheelchair	0.8 km
Neighbour- hood park	LEAP (local equipped area for play) + informal space	0.102 ha equipped	Foot; wheelchair	0.4-0.8 km
Small recreational open spaces	'low-grade' recreation	0.1-0.2 ha	Foot; wheelchair	0.4-0.6 km
Linear open spaces	Relaxation; green link		Foot; cycle	
Semi-natural sites	Comparatively undisturbed sites, managed for wild flora and fauna		Cycle; foot; wheelchair	1.5-2.0 km

Figure 4.1: Hierarchy and typology of open spaces of recreational value, and provision standards for Reading

• There are two existing policies on provision of open space. The overarching strategic policy in the Core Strategy (PP004) is CS29, which specified the level at which on-site space should be provided and provides general guidance, and this is supplemented by the more detailed policy DM16 in the SDPD which includes the specific standards. As set out in the Open Spaces Strategy Update Note, this has led to an increase in the amount of recreational public open space, although the amount of additional space has still been limited.

4.18.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• EN9(i) No policy - REJECTED

Without a policy specifying when open space should be provided, and the types of open space required, there would be little prospect of securing substantial additional space either to serve developments or to help to address existing gaps. This would lead to further pressure on existing spaces, and poorer access to areas needed for sport and recreation.

• EN9(ii) Continue with current policies (CS29 and DM16) - PROPOSED OPTION This approach would carry forward the existing policies, albeit combined into a single policy to reduce confusion. The Open Spaces Strategy Update Note (EV022) has demonstrated that the findings of the OSS (EV021), which led to the existing policy approach, remain broadly valid, and have resulted in both an increase in recreational public open space and in the accessibility of such space.

• EN9(iii) All development provide on-site provision - REJECTED This option would be highly unlikely to be deliverable, as, in the urban context of Reading, a large proportion of development takes place on constrained sites where there is little prospect of being able to provide public open space. The 50 dwelling threshold, generally, although not always, indicates broadly the point at which sites are able to accommodate on-site open space.

4.19 Access to Open Space (EN10)

4.19.1 Key Considerations

- The Council produced an Open Spaces Strategy in 2007 (OSS, EV021) which looked at access to public recreational open space as one of its main issues. This found that, although the overall amount of open space in Reading is reasonable, its distribution across the Borough is very uneven. In general, there were a number of areas which were not served by any recreational public open space, and there were also a number of severance lines such as major roads, railways and rivers, that restricted access.
- An Open Spaces Strategy Update Note was produced in 2018 (EV022), which looked at whether there had been changes that would affect the OSS conclusions. Some gaps in access had been filled by new provision, but in general the same issues remained.
- The NPPF identifies that "access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities" (paragraph 73).
- The Core Strategy (PP004) contains an existing policy (CS29) which seeks to improve access to open space where it is poor, in response to the issues identified in the OSS.

4.19.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

EN10(i) No policy - REJECTED

This option would fail to address the issues that have continued to be identified through evidence, that there are areas of Reading where access to open space is not adequate, and would result in opportunities to remedy this issue being missed.

• EN10(ii) Developments will improve links to existing open spaces, where possible - PROPOSED OPTION This option would continue the existing policy approach, which is a clear statement that development should improve access to existing spaces where there is an identified issue. The need for this approach is considered to come clearly across in the evidence.

4.20 Waterspaces (EN11)

4.20.1 *Key Considerations*

- Reading sits at the meeting point of two very significant watercourses. The River Thames flows to the north of the town centre, and is surrounded largely by flood meadows and open spaces. The River Kennet/Kennet & Avon Canal flows through the south west of the Borough and through the urban heart of the town centre, before meeting the Thames to the east of the centre. Within the town centre it is heavily urbanised, but to the south west it is surrounded by meadows. There is also an extensive network of more minor watercourses, including the Holy Brook, which is culverted for much of its route through the town centre, and the Foudry Brook in south Reading.
- The Council's Waterways Vision was produced in 2005 by the Council, in partnership with the Environment Agency, the Waterways Trust, British Waterways and the Oracle Corporation. The strategy is based on recognition of the need to improve the river and corridors along the Thames and Kennet in Reading, and relates to the area between Caversham Lock on the Thames and the County Lock on the Kennet, which broadly equates to the town centre. Within that area, it recognises the different characters of the two rivers, using the concepts of 'Tranquil Thames' and 'Urban Kennet'. This approach fed into the strategy for the centre as set out in the RCAAP. The document also looked at examples of buildings that had a good or poor relationship with the rivers.
- More recently, the Reading 2050 vision (OP009), launched in 2017, is based around three core themes, one of which is a 'City of Rivers and Parks'. This sets out ambitious goals that involve the use of the watercourses and their immediate environment, including for urban living, food production, renewable energy generation, water travel, education, leisure and sport and for enhancement of their ecological potential. This celebrates the role that the water has played in the history of Reading, and looks to build on this as a key part of Reading's future.
- The original Thames Waterways Plan produced by the River Thames Alliance was withdrawn in 2016, but a consultation on a successor in 2015 identified a number of principles that should feed into planning policy:

C1. Built Environment

- C1.1 Secure high quality development on the river and riverside which is appropriate to its context and give proper protection to the flood plains.
- C1.2 Protect and enhance historic building sites, structures, landscape, skylines and views of importance.
- C1.3 Make the best use of the river's potential attraction or a range of uses, including regeneration of redundant land and buildings and promotion of recreational opportunities to protect important archaeological remains

C2. Natural Environment

- C2.1 Conserve and enhance the biodiversity of the river.
- C2.2 Respect designated green belt, and designated areas of ecological, conservation and landscape importance.
- C2.3 Improve the quality and provision of open space along the river.

C3. Promote, Protect and Enhance the Use of the River

- C3.1 For transport use.
- C3.2 For recreation and water-related sport.
- C3.3 For public access.

This clearly retains an emphasis on the need for high quality development that takes account of the multi-functional role of the waterside environment.

• The Core Strategy (PP004) contains an existing policy CS8, which sets out general principles that reflect the multi-functional role of the waterside environment as set out above, and ensures that development in such locations is of a high quality which enhances the setting of watercourses.

4.20.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• EN11(i) No policy - REJECTED

There is no national guidance applying specifically to waterspace. Though the NPPF recognise the need for conserving wildlife species and habitats, improving the built and natural environment and providing opportunities for recreation and leisure, guidance at this level is not tailored to local priorities for waterspace, and fails to recognise contributions to local character, amenity etc.

 EN11(ii) Development should not harm the character of watercourses -REJECTED

This option would simply require no harm to the overall character of the watercourses. However, the quality of some sites adjoining the waterway is poor, with development turning its back on the water, and this approach would not harness the key opportunities to enhance these areas to help to meet the Reading 2050 vision objectives.

• EN11(iii) Development should not harm character and should enhance, where possible, ensuring public access - PROPOSED OPTION This option seeks to bring together the various vital roles of the areas around watercourses in terms of sport and recreation, biodiversity, heritage and landscape into a policy that focuses on enhancement wherever the opportunities exist. This makes a contribution to meeting the overall aims, in particular those of the Reading 2050 vision where the rivers would be a centrepiece to the future of the town. There will be a balance to be struck between some of these roles on occasion, for instance possible tensions between biodiversity and recreation, and the policy seeks to provide the tools to resolve these.

4.21 Biodiversity and the Green Network (EN12)

4.21.1 Key Considerations

- The NPPF takes a proactive stance on biodiversity. Paragraph 109 recognises not only the need to minimise impacts on biodiversity, but also to achieve biodiversity net gain wherever possible. This includes "establishing coherent ecological networks that are more resilient to current and future pressures".
- In drawing up Local Plans, authorities should:

"set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks" (paragraph 113)

• As well as protecting sites of value, the NPPF also endorses a more proactive approach. Paragraph 114 states that local planning authorities should:

"set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure"

- The NPPF provides further detail on the content of planning policies, stating that policies should
 - "plan for biodiversity at a landscape-scale across local authority boundaries;
 - identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;
 - promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan; aim to prevent harm to geological conservation interests; and
 - where Nature Improvement Areas are identified in Local Plans, consider specifying the types of development that may be appropriate in these Areas" (paragraph 117).
- Further guidance is included in paragraph 118 of the NPPF for planning applications, and, in particular, a hierarchical approach to significant harm is introduced, whereby harm should be avoided, then mitigated, then, as a last resort compensated for. Opportunities to incorporate biodiversity should be encouraged, and there should be no loss of irreplaceable habitats such as ancient woodlands.
- The Core Strategy (PP004) contains an existing policy CS36 providing strategic direction on biodiversity issues in Reading. It was supplemented by policy DM17 in the SDPD (PP006), which took a more proactive approach in attempting to link the fragmented habitats together into a network.
- Reading does not contain any internationally designated sites for wildlife (such as Special Protection Areas, Special Conservation Areas or RAMSAR sites) or any nationally designated sites (such as Sites of Special Scientific Interest). Therefore, the requirement in the NPPF to distinguish between sites of international, regional and local importance is not a pressing concern in Reading's Local Plan. The locally-designated sites that exist in Reading are Local Wildlife Sites (LWS), Local Nature Reserves (LNRs) and Biodiversity Opportunity Areas (BOAs).
- Local Wildlife Sites are areas of land recognised for having high wildlife value containing rare or threatened habitats and species, of which there are around 741 in Berkshire, covering around 8% of land (according to Thames Valley Environmental Records Centre, or TVERC¹⁵). There are 21 Local Wildlife Sites in Reading, comprising 317 ha, 8% of land within Reading. LWSs are designated

¹⁵ <u>http://www.tverc.org/cms/LWSLivingLists</u>

outside the Local Plan process and are amended on an ongoing basis. TVERC maintains information on the degree to which these LWSs are under positive conservation management. Overall, in Reading, for 2016-17, 18 of the 21 sites were in positive conservation management, representing 86% of sites, the highest level in Berkshire and well above the Berkshire average of 69%.

- Local Nature Reserves are sites designated under section 21 of the National Parks and Access to the Countryside Act 1949. They are designated by local authorities (or, if empowered to do so by the local authority, town and parish councils). There are five Local Nature reserves in Reading. These are McIIroy Park, Round Copse, Blundell's Copse and Lousehill Copse, all of which form part of a network of woodlands in West Reading, and Clayfield Copse in Emmer Green. All of these sites are also Local Wildlife Sites. This totals 41 ha, 1% of the land within Reading. More detail on these sites can be found on the Natural England website¹⁶.
- Biodiversity Opportunity Areas are areas identified as having potential for significant gains for biodiversity. They are less about protection of individual sites, and more about looking at wider areas at a landscape scale and identifying opportunities for expansion, linking and buffering sites. Two BOAs have been identified for Reading, both of which also cross the boundary into West Berkshire. The West Reading Woodlands and LNRs BOA is a network of wooded sites in and around West Reading and Tilehurst, including four of the LNRs identified above, where there is particular opportunity for woodland and parkland restoration and restoration of grassland habitats. The Kennet Valley East BOA is the land surrounding the River Kennet between Newbury and Reading, and particular opportunities include management and restoration of rivers, management of gravel pits, and management, restoration and recreation of reedbed and fen and lowland meadow and wet grassland. Once again, much of this land is also covered by LWS and, in some cases, LNR, designations. More information can be found on the Berkshire Local Nature Partnership website¹⁷.
- In addition to the above areas, there are a number of habitats that fall within the list of priority habitats identified under the UK Biodiversity Action Plan. These are not formally designated as such, but their extents are kept under review by TVERC based on analysis of aerial photographs, which in the Berkshire region are flown approximately every five years, and augmented by ground based observations in some situations. The most recent survey was 2012-13. The total area of priority habitat in RBC was calculated at 499.5ha, approximately 12.4% of the land area. The list of habitats and their extent within Reading is set out in Table 4.2.

¹⁶

https://designatedsites.naturalengland.org.uk/SiteList.aspx?siteName=&countyCode=2&responsiblePerson=&Designation
Type=All
The transmission of the second se

¹⁷ http://berkshireInp.org/index.php/west-reading-woodlands-and-Inrs

UK Biodiversity Action Plan Habitat	Area (ha)
Coastal and floodplain grazing marsh	53.4
Coastal and floodplain grazing marsh and Possible UKBAP	
grassland habitat	69.8
Eutrophic standing waters	13.4
Lowland fens	29.8
Lowland meadows	4.9
Lowland mixed deciduous woodland	145.2
Lowland wood pastures and parkland	34.6
Ponds	0.1
Possible UKBAP grassland habitat (to be confirmed by field	
surveys)	138.3
Rivers	2.7
Wet woodland	7.3
Total	499.5

Table 4.2: UK Biodiversity Action Plan Habitat in Reading

- As Reading is such an intensely developed urban authority, one of the main defining features of all of the areas of recognised biodiversity importance is fragmentation. Many of these habitats are very small and surrounded by development. Therefore, in 2009 a Green Network project was undertaken by TVERC to consider how all of these sites could be drawn together into a wider network. This involved identification of Grade 1 areas, Grade 2 areas and potential green link areas, as set out below:
 - Grade 1 Areas the most ecologically important areas within the borough, including Wildlife Heritage Sites, Local Nature Reserves and areas of Biodiversity Action Plan habitat;
 - Grade 2 Areas areas of green space that are likely to be of importance for biodiversity such as cemeteries, allotments, gardens, privately owned woodlands, lakes, grassland, brownfield land and known wildlife corridors or areas of semi-improved and improved land, greater than 0.25ha in size, that are likely to enhance the ecological network within the urban landscape; and
 - Potential green link areas the linking passages that, where possible, follow linear features, including road verges and lines of mature trees, small hedgerows, paths and unmade roads that if managed for wildlife could contribute to biodiversity within the green network

This work directly informed the focus of existing policy DM17 in the SDPD on creation of a Green Network, and the definition of that network on the Proposals Map. However, Grade 2 areas were extremely extensive, and encompass a great deal of land within the Borough including in private ownership, such as rear gardens, and were not identified for protection in their own right. It would have had an extremely restrictive effect on private development rights without having been founded on a particularly robust evidence base (most of these areas are included for their potential, rather than proven significance). Instead, it was considered more appropriate to show these areas as Green Links, in order that their contribution to the integrity of the network continues to be recognised, which is the purpose of the policy, without overly restricting development on private land.

• Much of that 2009 work is still relevant. However, it is considered necessary to review it to identify whether there has been significant change in the extent of the areas that should result in a revised approach. Appendix 2 therefore includes the maps produced by TVERC in 2009, with annotations detailing any significant changes in the areas. Broadly, it shows that, whilst there have been specific changes to the extent of Grade 2 areas in particular, this has not affected the potential for creation of the network outlined in DM17 and the Proposals Map. Some sites have been developed, but, in particular where these involve residential, some form of green link has managed to be preserved, even if it is only a line of planting. In many cases, sites have been upgraded from Grade 2 to Grade 1, usually due to the presence of BAP priority habitat.

4.21.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• EN12(i) No policy - REJECTED

This would fail to comply with the clear emphasis of the NPPF on plans taking a proactive approach to biodiversity, recognising important features and seeking to establish a network, as well as on the need for a criteria-based approach to development proposals. It would likely lead to loss of existing biodiversity, and the loss of an opportunity to enhance habitats and the network.

• EN12(ii) Development must retain biodiversity value and green network connectivity - REJECTED

This would be a more reactive approach than the proposed option, and would mean identifying the existing significance and protecting it. As above, it would fail to reflect the more proactive approach set out in the NPPF and would lead to continuing fragmentation of habitats without taking opportunities to stitch the network together to allow for movement between sites.

• EN12(iii) Development must retain and should seek to enhance biodiversity and green network connectivity - PROPOSED OPTION This approach would look to combine the policies within existing development plans, with the reactive overall approach of CS36 and the more proactive approach to a network within DM17. There are not considered to be reasons to significantly change the identified network, although some of the areas of greatest significance have slightly changed since the Proposals Map was adopted, and this should be shown on the new version. There are also new elements, such as the approach to harm of avoidance, mitigation and then compensation, which need to be reflected in the policy. This approach will fully comply with the strong emphasis in the NPPF and will provide an appropriate approach for the specific circumstances of Reading.

4.22 Major Landscape Features and Areas of Outstanding Natural Beauty (EN13)

4.22.1 Key Considerations

 Paragraph 109 of the NPPF requires protection and enhancement of valued landscapes. Paragraph 113 states that criteria-based policies should be used to set out how proposals for development affecting designated landscape areas will be judged.

- A Landscape Character Assessment for Berkshire was undertaken in 2003. Most of the landscape types do not extend into Reading Borough due to its urban nature, but two landscape types in particular are present.
 - Landscape type B is Lower Valley Floor, and it refers, in Reading, to the area along the River Thames, characterised by flat and open lowland. The area is generally the floodplain of the Thames. The overall suggested strategy is to conserve and restore landscape character, which in the case of the Reading area, should be particularly for the purposes of recreational use.
 - Landscape type C is Lower River with Open Water, and has the greatest area within the Borough boundaries, encompassing the Kennet Meadows area as far south as Green Park. It is characterised by a wide river valley, with a number of gravel workings at various stages of development. Some of these workings in the Reading area are now established lakes within mature woodland. The general suggested strategy is to strengthen and enhance those areas in good condition and with strong character, and create new character in other areas. The area around the Kennet is described as being very weak, and therefore the focus is on creation of character, primarily through restoration of wetland.

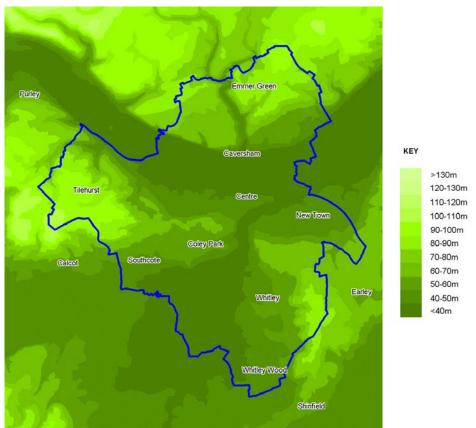
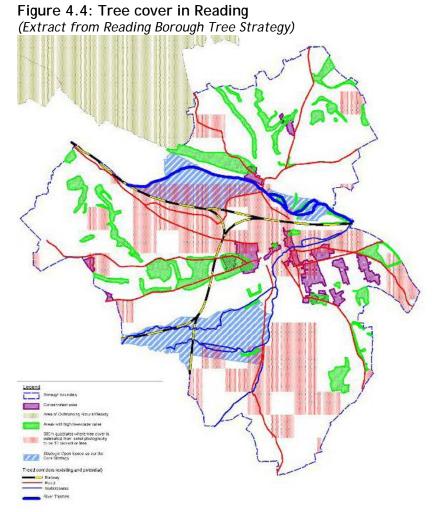


Figure 4.3: Topography of Reading

 An understanding of Reading's topography is vital to comprehend how particular types of landscape are perceived. Figure 4.3 shows the topography of Reading. What is clearly visible is that Reading is divided by the rivers Thames and Kennet into three areas of higher ground, in the north, west and southeast. In all cases, the areas within the Borough are parts of a larger area that extend beyond the boundary. In the case of the northern parts of Reading, it is where the land starts to rise from the Thames to form the Chiltern Hills. In Caversham and Tilehurst, the valley sides are particularly steep, meaning that some of the views of the opposite valley sides are particularly clear. Also visible on Figure 4.3 are a number of small valleys extending into the chalk north of the Thames. These valleys are mainly dry (i.e. there is no watercourse at the bottom), and are characteristic of the wider Chilterns area.

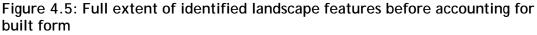
• Another key word in the list of Major Landscape Features designated under EN13 is 'wooded', referring to the East and West Reading wooded ridgelines. Figure 4.4 is taken from the Council's draft Tree Strategy (published in February 2010), and this shows the areas of the Borough with high treescape value in green. It should be noted that treescape value in this case does not always equate to landscape significance. Many of the areas shown in green, particularly those immediately to the west of the centre, relate to street trees, which are a key characteristic of areas such as the Downshire Square conservation area. However, there are clear lines of tree cover in the west and south east of the Borough that tie in with the crowns of the ridgelines identified in Figure 4.3. In addition, parts of the valleys north of the river are also visible on the map below.

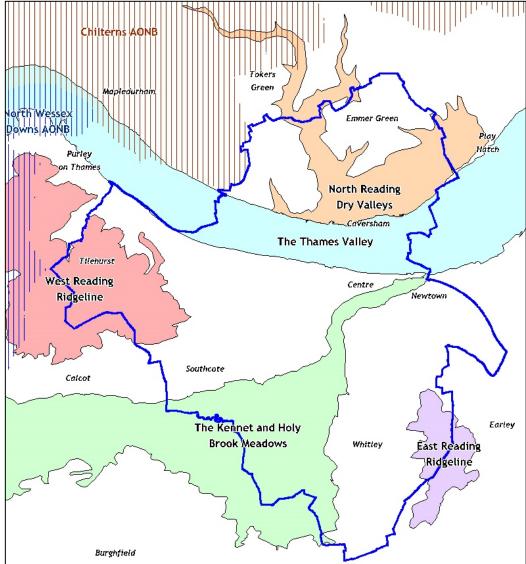


• The above information can be used to define the overall extent of the features. In the case of the Thames Valley and Kennet and Holy Brook Meadows, these features have been defined by the boundaries of the floodplains of those watercourses. The other three features have been defined using topographical mapping, with the North Reading dry valleys including the valley sides and bottom, and the East and West Reading Ridgelines being the

area over 75 m above sea level - in both cases this is where the slopes begin to level off into a ridge or plateau. Figure 4.5 also shows that these physical features extend significantly beyond the Borough boundaries, and bring aspects of the wider countryside landscape into the urban area, thus linking Reading with its setting. Clearly, much of the area of the wider features shown in has now been developed, and the following approaches help to reduce the overall feature down to the specific areas to be preserved:

- Thames Valley: all areas of flood meadow contiguous with the area outside Reading, and the wooded valley sides to the north of the Thames;
- Kennet and Holy Brook Meadows: all areas of flood meadow. The Kennet floodplain narrows as it travels through central Reading, where it is urbanised and is no longer part of the landscape feature;
- West Reading Wooded Ridgeline and East Reading Wooded Ridgeline: areas above 75m with prominent tree cover;
- North Reading Dry Valleys: the majority of the dry valleys are built-up and excluded, but there are a string of open spaces, woodlands and wooded lanes (including areas in private ownership) within and at the crest of these valley systems that are highly visible.





- The Chilterns Area of Outstanding Natural Beauty follows the boundary between South Oxfordshire and Reading to the west of Caversham, but does not come into Reading at any point. The Chilterns AONB Management Plan 2014-2019 contains an assessment of the landscape character of different elements of the AONB. The areas closest to Reading are characterised as 'plateau with valleys', 'Thames fringes' and 'Thames valley', which echo elements of the important landscapes within Reading. The following broad aims are identified:
 - Conserve and enhance the outstanding qualities of the AONB as part of the national landscape heritage
 - Maintain those features which make significant contribution to the character and quality of the area and to regional and local distinctiveness
 - Enhance and restore those parts of the landscape which are degraded or in decline
 - Enhance the level of awareness of what makes the Chilterns landscape special and the desire to care for it.
- The North Wessex Downs AONB does not adjoin Reading, but at its closest point is within 200 metres of the boundary with West Berkshire. The Management Plan 2014-2019 identifies a range of landscape types in close proximity to Reading, but the closest types to the boundary are 'river valleys' and 'lowland mosaic'.
- There are existing policies in the Core Strategy (CS37) and the Sites and Detailed Policies Document (SA17) which set out the policy approach for and define major landscape features. This policy approach has not prevented all development within these areas, but has ensured that it avoids detrimental effects on the landscape. There have not been significant landscape changes which warrant a different approach.

4.22.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• EN13(i) No policy - REJECTED

This option would fail to protect important landscapes that are essential to the setting of the urban area. As such, it would not fulfil the NPPF, and development could detrimentally affect the character and distinctiveness of Reading.

• EN13(ii) No planning permission for development that would detract from Major Landscape Features - PROPOSED OPTION This option would broadly continue the approach in existing development plans, adding in reference to the North Wessex Downs AONB, which was not previously mentioned. It will help preserve the distinctiveness of Reading through protecting its landscape setting. It would not be a complete block on development, but would ensure that such development is carried out in a way that has regard to its wider landscape effects.

4.23 Trees, Hedges and Woodlands (EN14)

4.23.1 *Key Considerations*

• The NPPF sees conserving and enhancing the natural environment as a core planning principle. In order to enhance biodiversity, the NPPF states that

"planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss" (paragraph 118).

- The Council produced a Tree Strategy in 2010 which aimed to set out a vision and strategy for trees in Reading for both the public and private sectors. This contained nine objectives:
 - 1. Managing the Council's tree stock;
 - 2. Protecting and enhancing important landscape features;
 - 3. Enhancing areas lacking tree cover;
 - 4. Enhancing biodiversity;
 - 5. Climate adaptation;
 - 6. Public awareness of trees;
 - 7. Securing the resources to deliver the strategy; and
 - 8. Manage tree waste and by-products.
- At the time of the Tree Strategy in 2010, it was estimated that 17.8% of the Borough was covered with tree canopies. This compared unfavourably with a comparable urban area such as London, where the figure is around 20%. Tree cover was, and remains, unevenly distributed, with some areas such as the Oxford Road severely lacking in tree cover. Figure 4.4 (see previous section) shows the areas of particular tree cover, with the greatest level in north and west Reading, as well as parts of east Reading. New tree planting in areas of low tree cover is one of the core elements of the approach of the Tree Strategy.
- In terms of areas of existing importance, the Council has over 1,000 tree preservation orders in place, in locations all over the Borough. There are a number of wooded areas, in particular around the landscape features discussed in the previous section. There are also two areas identified as being ancient woodland, which are the western part of McIlroy Park in Tilehurst and part of Clayfield Copse in Emmer Green.
- There are currently two policies dealing with trees, hedges and woodlands in Reading's existing development plan. CS38 of the Core Strategy (PP004) seeks to retain existing features of importance, whilst DM18 of the Sites and Detailed Policies Document (PP006) seeks to secure new planting in development.

4.23.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• EN14(i) No policy - REJECTED

This option would fail to protect important trees, hedges and woodlands and could further erode tree coverage in the Borough, detrimentally affecting biodiversity, climate change adaptation, air quality and quality of life.

- EN14(ii) Policy protecting trees, hedges and woodlands from removal or damage - REJECTED
 This option would largely be similar to existing CS38 in the Core Strategy, which is mainly a reactive policy protecting existing important features.
 Whilst that is necessary, it is not in itself sufficient to address the existing identified issues of low tree cover in much of the Borough, and would not therefore help to improve the overall natural environment for a range of purposes.
- EN14(iii) Policy protecting trees, hedges and woodlands from removal/damage and improving the level of tree cover, requiring development to make provision for tree planting PROPOSED OPTION This option would pull together the existing policy approach from both policies CS38 and DM18 to provide a single policy protecting significant trees, hedges and woodlands and seeking additional planting as part of new developments. This approach reflects the overall approach in the Tree Strategy and will help to rectify the deficiencies identified in parts of Reading. As such, it will have beneficial effects in terms of quality of life, adaptation to climate change, biodiversity, air quality, landscape and townscape.

4.24 Air Quality (EN15)

- 4.24.1 Key Considerations
 - Among the NPPF's core planning principles in paragraph 17 are that planning should contribute to conserving and enhancing the natural environment and reducing pollution, and that it should take account of and support local strategies to improve health.
 - More specifically, the NPPF states the following at paragraph 124:

"Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan."

- There are EU limit values and national air quality objectives (NAQOs) for concentrations of a variety of pollutants in place, and these are summarised on the DEFRA website¹⁸.
- Air quality has been a longstanding concern in Reading. In April 2009, the Council declared a single Air Quality Management Area, the extent of which can be seen in Figure 4.6. This very extensive area covers central Reading, and most of the main arterial road and rail lines. Not every part of this area had experienced exceedences of the air quality objectives, but a precautionary approach was taken in the designation, to cover areas which may be affected by poor air quality in future. This AQMA remains in place. As this area covers the centre and most of the main transport corridors, there is very considerable overlap with the areas likely to see greatest development, particularly in line with policy CC6.

¹⁸ <u>https://uk-air.defra.gov.uk/air-pollution/uk-eu-limits</u>

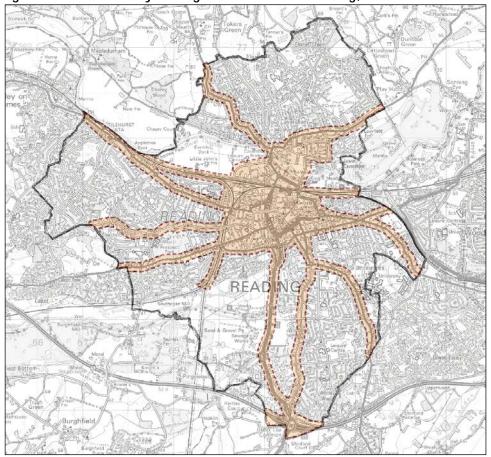


Figure 4.6: Air Quality Management Area in Reading, 2009

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- 2009 also saw the production of the Council's Air Quality Action Plan, which again remains in place. This included a set of measures to address air quality issues in Reading. Those measures which are particularly relevant to the production of the Local Plan are set out below.
 - APTM1 We will continue to progress the core infrastructure projects detailed in and arising from the Local Transport Plan 2006-2011, specifically
 - Cow Lane Bridges
 - Green Park Station and Multi Modal Interchange
 - M4 Junction 11 improvements
 - Park and Ride
 - Quality bus corridors/Mass Rapid Transit
 - Reading Station Upgrade
 - Third Thames Crossing
 - Oxford Road relief road
 - APTM2 We will continue to implement the strategic themes of "Quality Travel for Reading" including the new cycling strategy and monitor for the increase of cyclists to 5% by 2011.
 - **APTM3** We will continue to use the planning processes to ensure that whilst encouraging the economic development of Reading this remains sustainable and within a balanced transport strategy.
 - APDC1 We will ensure through the planning process that future development does not result in any further deterioration of air quality and where possible, results in an improvement in overall environmental quality.
 - APDC2 We will use planning processes to

- minimise environmental impacts from major new developments
- ensure that major development should not result in increased emissions that contribute to air quality and climate change problems
- locate major development in areas that are highly accessible by sustainable modes of transport in order to reduce the number of car journeys that need to be made within the Borough
- APDC3 We will continue to seek financial contributions for improving air quality, air quality monitoring and in pursuit of the implementation of this action plan in line with PPS 23.
- APDC4 We will work with local developers and construction companies to develop a local code of practice for dust and particle control, including a restriction on bonfires.
- The existing policy in the SDPD, DM19, followed on from the production of the Air Quality Action Plan and the declaration of the AQMA, and sets out a strong, criteria-based approach to ensure that new development does not worsen air quality, and does not result in sensitive development taking place in areas of poor air quality where the impacts cannot be mitigated.
- The Council produced a 2017 Air Quality Status Report, available on the Council's website¹⁹, which sets out most up-to-date information on air quality for 2016, in particular performance against air quality objectives.
 - In terms of Nitrogen Dioxide (NO₂), the four continuous monitoring stations recorded average levels of between 30 and 39µg/m³, which is below the annual mean national air quality objective level of 40µg/m³. For three sites, this shows an improvement against this measure since 2013, but one site at New Town has recorded a sharp increase.
 - For particulate matter (PM₁₀), the annual average for all four stations once again did not exceed the national air quality objective level of 40µg/m³. The levels shown are between 13 and 22µg/m³. There is also a NAQO to not exceed 35 days of over 50µg/m³ in a year, and all sites were well below this level. The trend since 2013 is once again generally of air quality improvement.
 - For smaller particulate matter ($PM_{2.5}$), there are no NAQO objectives. The level at the AURN station was $9\mu g/m^3$, lower than 2012-14 levels but an increase over 2015.

In general, although NAQO levels are not exceeded and many areas of Reading have generally good air quality, it is NO_2 in locations close to congested roads that is the greatest concern, as the 2016 levels are in some cases not far below NAQO levels, and there is also history of exceedance on some sites.

 Against this background, the Council also recently produced an Air Quality Action Plan Update 2016 (included within the evidence base as OP008). This carries up to date information on the interventions that have been and will be made to continue to improve air quality. Many of these are transport interventions, and correspond to many of the schemes making up part of the Local Transport Plan (OP005) and which are reflected in policy TR2 of the Local Plan. A number of others are education initiatives to encourage changes in behaviour such as use of sustainable transport, reducing vehicle idling and

¹⁹ <u>http://www.reading.gov.uk/media/6388/Air-Quality-Annual-Status-Report/pdf/Reading_2017_Annual_Status_Report.pdf</u>

addressing bonfires. The 2016 update also continues to highlight the role of planning as an ongoing measure:

"We will ensure through the planning process that future development does not result in any further deterioration of air quality and where possible, results in an improvement in overall environmental quality."

- More recently, following a successful legal challenge from Client Earth, the Government were required to review their draft Air Quality Plan published in 2015, which set out actions to comply with levels of Nitrogen Dioxide in the environment in accordance with EU Directive 2008/50/EC. This resulted in the Draft Air Quality Action Plan 2017. The principal change to the proposed plan was that DEFRA modelling indicated that more local authority areas would be in breach of NO₂ levels by 2020 and therefore would be non-compliant. Forty areas were named, including Reading (of which the plan considers Wokingham Borough to be part). In the Government's technical document which accompanied the consultation, it was indicated that 27 of the 40 areas may need to introduce a Clean Air Zone, either a charging or non-charging zone.
- However, consultation resulted in a revised version of the national Air Quality Plan, where the number of areas where exceedences were expected at 2020 were reduced to 29, which did not include Reading, which was expected to meet legal requirements by 2020. Reading were therefore exempt from the requirement to prepare an action plan. However, it should be noted that Reading's modelled levels fell below the legal requirements in 2020 by a slim margin, and therefore, regardless of the requirements of the Air Quality Plan, there is a continued need to undertake measures to improve air quality in Reading and keep actions in the Air Quality Action Plan under review. As well as inclusion of an air quality policy in the Local Plan, this includes the need to promote use of ultra low-emission vehicles (as set out in policy TR5 of the Local Plan) and to continue to promote sustainable transport measures (including policies TR1, TR2 and TR4).

4.24.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• EN15(i) No policy - REJECTED

This option would mean that there would be no policy covering air quality, and would mean reliance on the general policy EN15 on pollution and water resources, as well as national and regional policy. However, this would be out of step with the proactive approach being taken to air quality across the Council, would not help to fulfil the measure set out in the Air Quality Action Plan Update 2016, and would fail to deal with the air quality issues Reading currently faces.

• EN15(ii) Development that would worsen air quality will not take place unless effects can be mitigated, no further requirements for sensitive uses (residential, schools, hospitals, care homes) - REJECTED This approach would only deal with part of the issue, i.e. proposals that would worsen existing levels of air quality, and would not deal with placing sensitive uses within areas of existing poor air quality. Such development may well therefore take place without consideration of any mitigation measures that are needed and result in increased exposure to air quality effects. • EN15(iii) Option (ii) and sensitive uses must mitigate effects or make appropriate financial contributions - PROPOSED OPTION This approach would address both the effects of new development on air quality, and the effects of poor air quality on new development. It sets out the planning element required within the Air Quality Action Plan, and in doing so addresses the requirement of paragraph 124 of the NPPF. The existing policy DM19 in the SDPD is still relevant and robust, and should be broadly carried forward with amendments where necessary, mostly to the supporting text. Where planning policy can add value to what the development plan already says is in other areas, such as infrastructure for ULEVs, and that is covered by other policies such as TR5.

4.25 Pollution and Water Resources (EN16)

4.25.1 Key Considerations

- The NPPF states in paragraph 17 that, as a core planning principle, planning should contribute to conserving and enhancing the natural environment and reducing pollution, and that it should take account of and support local strategies to improve health.
- Paragraphs 120 to 125 of the NPPF specifically deal with pollution issues, and set the principle that "to prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location" (paragraph 120), and that development should take account of the effects of pollution on health and amenity.

Contamination

- In terms of contamination and land instability, the NPPF places the responsibility for securing a safe development on the developer or landowner. Development should be suitable for its location, taking account of past uses and remediation, should not be defined as contaminated land under the Environmental Protection Act 1990, and should be subject to investigation by a competent person (paragraph 121). There should not be duplication of other regulatory regimes.
- The Council has a Contaminated Land Strategy, which was produced in 2011, which is a requirement under the Environmental Protection Act, and deals with how the Council will approach identification and mitigation of contaminated land. The main steps set out are as follows:
 - 1. To identify areas of land within the borough that may be contaminated, by reviewing historical land use, carrying out site investigations and undertaking risk assessments in order to identify priorities for further investigation of higher risk sites.
 - 2. To formally designate contaminated land where appropriate;
 - To bring about the remediation of land so that it is "suitable for use" through voluntary remediation wherever possible, and by serving remediation notices;
 - 4. To maintain a public register containing contaminated land information;
 - 5. To review the possibly contaminated/previously investigated areas and the inspection strategy from time to time in light of new information; and
 - 6. To provide the Environment Agency with local land contamination information.

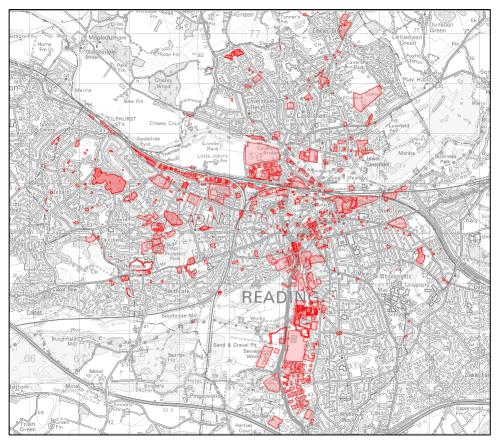


Figure 4.7: Potentially Contaminated Land in Reading

• Figure 4.7 shows the extent of potentially contaminated land in Reading. This has been based on past uses, so in a great many cases, further investigation will not show land to be contaminated. Many of the areas shown are current or previous industrial sites, but other historic uses that may have potential for contamination include landfill, sewage works, clinical sites and military establishments.

<u>Noise</u>

- For noise, there should be no significant impacts on health and quality of life, and other impacts that arise should be mitigated and reduced. Unreasonable expectations on existing businesses should be avoided where nearby uses have subsequently been established. Areas of particular tranquillity should be protected.
- Reading is a densely populated urban area, and this does mean that therew can be tensions in terms of noise. Table 4.8 shows noise related complaints in Reading during 2017 from the Council's records. Between 1st January and 31st December 2017, complaints received about noise totalled 481. Of these, the majority related to domestic noise, with much smaller amounts relating to commercial premises, pubs and clubs, construction sites and dogs.

Noise - Commercial Premises	43	9%
Noise - Industrial Premises	3	1%
Noise - Pubs and Clubs	32	7%
Construction Site Noise	33	7%
Domestic Noise	244	51%
Noise from Building Alarm	28	6%
Noise from Car Alarm	6	1%
Noise in the Street	20	4%
Noise from Barking Dogs	37	8%
Railway Noise	5	1%
Noise from Outdoor Events	26	5%
Non-specific	4	1%
TOTAL	481	

Table 4.8: Noise-Related Complaints in 2017

<u>Light</u>

 In terms of light, paragraph 125 states that "By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation."

Water Quality

- The NPPF (paragraph 165) states that planning policies should draw on river basin management plans. The Thames River Basin Management Plan (TRBMP) was updated by DEFRA and the Environment Agency in 2016. In terms of existing quality of water bodies within the area (which includes the length of the Thames from Gloucestershire to the Thames Estuary, including London), the plan looks at ecological and chemical status. Of 498 surface water bodies, 359 (72%) are of at least moderate ecological status, whilst all but 5 are of good chemical status. The picture in terms of groundwater is more mixed, and 53% of the groundwaters are quantitatively rated 'good', whilst 62% are rated chemically 'good'.
- The TRBMP seeks to achieve compliance with the Water Framework Directive, which has the following objectives.
 - to prevent deterioration of the status of surface waters and groundwater;
 - to achieve objectives and standards for protected areas;
 - to aim to achieve good status for all water bodies or, for heavily modified water bodies and artificial water bodies, good ecological potential and good surface water chemical status;
 - to reverse any significant and sustained upward trends in pollutant concentrations in groundwater;
 - the cessation of discharges, emissions and loses of priority hazardous substances into surface waters; and
 - progressively reduce the pollution of groundwater and prevent or limit the entry of pollutants.

The TRBMP particularly sets objectives for the number of water bodies that should reach a specific status by a certain date. One of the key headlines is the objective for 289 surface water bodies to achieve or maintain 'good'

ecological status by 2027, and all but two groundwaters to achieve 'good' chemical status by 2027.

- Measures to achieve these objectives, in terms of both preventing . deterioration and securing improvement, which are relevant to the Local Plan include: physical modifications; managing pollution from wastewater, and from towns, cities and transport; changes to natural flow and levels of water; water company investment; flood risk management investment; water resources sustainability measures. There are also more specific local measures. Measures for the Kennet catchment include habitat restoration, water efficiency measures and working with Thames Water on abstraction issues, and Reading's water abstraction is from the water treatment works on the Kennet. Measures for the relevant part of the Thames (Thame and South Chilterns) include development of recreational access on the Thames at Reading. providing social and economic benefits. The Local Plan can contribute towards these objectives in a variety of ways in addition to generally controlling water pollution and resources, including through enshrining water efficiency measures in new development, seeking to address water flows and ensuring promotion of the ecological role of watercourses.
- The Environment Agency has in the past monitored water quality under the General Quality Assessment at a more detailed local level, and information is available to view on the website²⁰. Chemistry and biology are graded from A (very good) to F (bad), whilst nitrates and phosphates are graded from 1 (very low) to 6 (very high), although high levels of nutrients are not necessarily bad. The 2009 levels (the most up-to-date presented) are set out in Table 4.9. In general, it can be seen that the quality of watercourses in Reading at 2009 was very good.

	Chemistry	Biology	Nitrates	Phosphates	Year	
Thames						
Whitchurch Stw - Kennet	А	A	4	4	2009	
Kennet						
Holy Brook - Thames	А	-	4	4	2009	
Foudry Brook - Holy Brook	А	-	4	4	2009	
Sulhampstead Stream -	А	A	4	3	2009	
Foudry Brook						

Table 4.9: General Quality Assessment of Watercourses in Reading

Water Resources

- NPPF paragraph 156 further states that Local Plans should contain strategic policies for securing infrastructure, including water supply and wastewater.
- The Council has liaised with Thames Water throughout the process on the implications of the level of development for water resources. At a strategic level, Thames Water are currently considering the high level investments that are needed to ensure adequate water infrastructure across their area. At a local level, the comments from Thames Water are included within the Statements of Consultation (LP006 and LP012). There are sites where infrastructure for water supply and wastewater will potentially need to be upgraded, but this will ultimately be a matter for the developer in liaison with Thames Water. As a general rule of thumb, providing this infrastructure can take up to three years. Where this is the case, the relevant site allocation

²⁰ <u>http://apps.environment-agency.gov.uk/wiyby/37811.aspx</u>

policy highlights it. For sewage treatment capacity, there is a potential that the overall scale of development will mean a need for additional capacity at the sewage treatment works, and Thames Water are in the process of examining options.

• A Water Quality Assessment (EV029) has been undertaken for Reading by PBA to support the Local Plan. This focuses particular on dewerage discharge. It concludes that there is generally the infrastructure in place and the environmental capacity to cope with the increase in housing proposed in the Local Plan.

4.25.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• EN16(i) No policy - REJECTED

Not including a local-level policy within the Local Plan would mean a reliance on the NPPF. It is not considered that prevention of harmful effects through pollution could be guaranteed, and in ignoring this issue, it would fail to comply with the requirements of the NPPF itself.

• EN16(ii) Continue existing policy (CS34) - PROPOSED OPTION

This approach would continue the general policy direction of the existing CS34 in the Core Strategy (PP004), which is a general development management policy ensuring that development does not take place where it would result in damage to the environment through pollution or where water and wastewater infrastructure would not be provided, or in locations where sensitive uses would be put in locations where they would be exposed to high levels of pollutants, unless this can be mitigated. The consultation process, including through comments by the Environment Agency, Natural England and the Council's Environmental Protection team has led to the wording of tyhis policy being considerably refined.

4.26 Noise Generating Equipment (EN17)

4.26.1 Key Considerations

- The NPPF states that the planning system should prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of noise pollution (paragraph 109). Paragraph 123 further states that planning policies should avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development.
- A Noise Policy Statement for England was produced in 2010 by DEFRA, which contains the following vision:

"Promote good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development."

The NPSE aims are as follows:

- avoid significant adverse impacts on health and quality of life;
- mitigate and minimise adverse impacts on health and quality of life; and

where possible, contribute to the improvement of health and quality of life.

- The Council receives numerous planning applications for the introduction of new noise generating industrial and commercial equipment such as air conditioning; refrigeration plant and kitchen extraction. This equipment is often installed in close proximity to residential properties and has the potential to cause significant annoyance and/or sleep disturbance to residents or other businesses, and have a negative impact on residential amenity.
- Planning applications for noisy mechanical plant are already required to be accompanied by a noise assessment which compares the noise level produced by the equipment against the existing background noise level using the British Standard 'Methods for rating and assessing industrial and commercial sound' (BS4142:2014). Whilst the BS4142:2014 method gives some guidance on assessing whether the level of noise may have an adverse impact, its recent update has made this guidance more ambiguous and crucially it does not set a noise limit for new plant.
- The Environmental Protection team for some years has required that the noise level from new mechanical plant be at least 10 dB below the background noise level in order to prevent 'background creep' (see draft policy for an explanation). However, this does not have the weight of policy behind it.
- Although general principles for noise were set out in policy CS34 of the Core Strategy (PP004), no specific noise levels are referenced in existing policy.

4.26.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• EN17(i) No policy - REJECTED

Whilst the Council would continue to usually seek the level set out in the proposed policy, without the benefit of policy it carries reduced weight. As such, it could lead to developments that have a detrimental effect on the quality of life and health of neighbours.

• EN17(ii) New policy limiting noise level to at least 10dBA below the existing background level - PROPOSED OPTION This option would be a new policy, giving clarity to developers and applicants on the maximum level of background noise at the nearest sensitive receptor that will be acceptable. It will ensure that equipment does not have a detrimental effect on the health and quality of life of neighbours.

4.27 Flooding and Drainage (EN18)

4.27.1 Key Considerations

 National policy in the NPPF continues the principle that development should be directed away from areas at highest risk of flooding, and where development in areas at risk of flooding in necessary, it should be safe and should not increase flood risk elsewhere (paragraph 100). The impact of climate change should also be taken into account. The NPPF contains a sequential test to direct development to areas at lowest risk of flooding, and an exception test for certain circumstances where development passes the sequential test.

- In preparing local plans, local authorities should produce a Strategic Flood Risk Assessment (SFRA), and should "develop policies to manage flood risk from all sources" (paragraph 100). Allocations of sites should accord with the sequential and exception test and should be based on the SFRA.
- With its location on both the Thames and Kennet, including parts of their floodplains, as well as a number of smaller tributaries, there are inevitably parts of Reading that are at risk of fluvial flooding. Surface water flooding is also an issue, with areas of topographical change as well as significant areas of hard surfacing, and flooding from sewers has also been an issue in the past.
- A Strategic Flood Risk Assessment to support the Local Plan has been prepared by PBA and was published in June 2017 (EV025). This considered which areas are at risk of flooding, and from which sources. It identifies and maps the functional floodplain, within which most development will be unacceptable, and considers scenarios for how flood risk may worsen as a result of climate change. It also makes recommendations in terms of planning, design and SuDS. As well as providing a key piece of evidence for the Local Plan, it will also be of vital importance through the development management process where sites are at risk of flooding.
- In general terms, much of the floodplain of the Thames and Kennet within Reading remains undeveloped, and makes up the majority of Reading's undeveloped land. The built-up areas at greatest risk of flooding are much of Lower Caversham, north of the Thames, significant parts of central Reading, mainly between the railway and the Thames but also around the Kennet, as well as much of the commercial land in south Reading, and, to a lesser extent, parts of West Reading nearest the Thames. The fact that most of the land available for development is in central and south Reading therefore makes it likely that some sites may be in locations at risk of flooding.
- On 18th December 2014, the Secretary of State for Communities and Local Government made a ministerial statement that altered national policy, and led to an expectation that sustainable drainage systems (SuDS) be incorporated in new major developments, meaning 10 dwellings or more, or the equivalent size of non-residential. This came into force on 6th April 2015. The requirement is for local authorities to consult the relevant lead local flood authority (LLFA) on relevant planning applications. In this case, Reading Borough Council is also the LLFA for the area. Information on SuDS schemes are now a validation requirement for major planning applications in Reading. Existing policy is largely silent on SuDS other than passing mentions in sustainability policies, but there is clearly now a need for this void to be filled.
- At the same time as the SuDS requirement came into force, DEFRA produced non-statutory technical SuDS standards²¹. These offer brief and easy-to-follow guidelines for how to design schemes to ensure that surface water is appropriately managed in schemes. Rather than seeking to replicate these standards within a policy, or to set out alternative standards, it makes sense for the policy to refer to these standards.

4.27.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

²¹ <u>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf</u>

• EN18(i) No policy - REJECTED

This approach would fail to provide any guidance on the approach to flood risk in the Borough, and would mean that the requirements for SuDS would be undertaken without any local policy to guide it. Whilst national policy on flood risk should ensure that development is generally steered away from areas at risk of flooding, a local policy underlines the importance of this approach.

- EN18(ii) Planning permission will not be permitted in areas identified as being at risk of flooding - REJECTED
 This approach would be overly onerous and would not be fully reflective of national policy. Under the NPPF, where development can fulfil the sequential test and, where appropriate, the exception test, development within areas at risk of flooding may be acceptable. Within Reading, this could lead to significant areas of the town centre where there is a need for physical regeneration being, at best, underused, and, at worst, left to decline and fall into vacancy.
- EN18(iii) Planning permission will not be permitted in areas identified as being at high risk of flood, in areas of lower risk development may move forward if it passes the exception test in the NPPF and major development must incorporate SuDS - PROPOSED OPTION This approach would reflect the approach within the NPPF and would enable beneficial development to take place where compliance with relevant policy

beneficial development to take place where compliance with relevant policy tests can be demonstrated. It would also provide local policy for the operation of the SuDS requirement.

4.28 Provision of Employment Development (EM1)

4.28.1 *Key Considerations*

• The NPPF offers a clear statement that Local Plans should promote economic growth. Paragraph 20 states that:

"To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century."

- As for the approach to housing, the NPPF makes clear that local planning authorities should objectively assess development needs for economic development, and should plan to meet them. Plans should:
 - "set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
 - set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period" (paragraph 21).
- Reading has worked with the other five Berkshire unitary authorities and the Thames Valley Berkshire LEP to commission an assessment of the functional economic market area within which Reading sits. The Berkshire Functional Economic Market Area Study (EV008, February 2016) identified a Central Berkshire FEMA covering Reading, Wokingham, Bracknell Forest and Windsor and Maidenhead.
- The Council then worked within that FEMA to identify needs for employment floorspace. The Central Berkshire FEMA Economic Development Needs

Assessment (EDNA, October 2016; EV009) looked at the needs for employment floorspace, based on the same forecasts that informed the Strategic Housing Market Assessment (EV011), so that employment and housing needs would be based on consistent evidence.

- The EDNA used three scenarios to identify employment floorspace needs, as follows:
 - Scenario 1: Labour Demand this was based directly on the employment projections from Cambridge Econometrics
 - Scenario 2: Past Completion Rates this projects forward past completion rates for the ten years between 2005/6 to 2014/15
 - Scenario 3: Labour Supply this takes into account the residential growth outlined in the SHMA
- The net employment floorspace needs identified for each scenario were as set out in Table 4.10 (from table 4.8 of the EDNA). What is immediately apparent is the degree to which Scenario 2 differs from the other two scenarios. The advice in the EDNA, with which the Council agrees, is that Scenario 2 represents a less robust base for future planning. It is merely the reflection of the previous ten years' change and therefore factors in constraint and policy issues, which cannot represent objectively assessed need. This plan therefore discounts Scenario 2. In addition, Scenario 1 does not fully take account of the changes as a result of providing for the need for housing. Scenario 3, which fully links to housing need, and which produces the highest figures, represents the most robust basis on which to plan.

	Scenario 1	Scenario 2	Scenario 3
Offices	19,460	-252,310	44,605
Industrial/warehouse	112,600	1,840	133,910
Total	132,060	-250,470	178,510

Table 4.10: Employment need from all scenarios in EDNA

- The EDNA then adds a 'safety margin' for flexibility, which represents one year's average gross completions, which for Reading is 8,170 sq m for offices and 14,530 sq m for industrial and warehousing.
- Finally, the EDNA suggests building in an allowance for future losses. Due to the significance of the floorspace losses that have occurred over the last ten years, this has the effect of more than doubling the overall requirement. The Council's view is that this is not appropriate to incorporate, for the following reasons:
 - With the HELAA process being undertaken, rather than using a crude estimate as in the EDNA, we can already assess and identify many of the likely losses of employment space for other uses;
 - The anticipated losses of employment space over the plan period will be included when assessing the capacity to meet this need, and inclusion of an allowance here would double-count this loss; and
 - The Council can use its planning powers to prevent much (although not all) of this floorspace loss, where doing so is appropriate.
- For this reason, the minimum need figures that should be planned for are the net requirements plus the safety margin. This means planning for the figures set out in table 4.11 between 2013 and 2036.

	Scenario 3	Plus safety margin	Identified need
Offices	44,605	8,170	52,775
Industrial/warehouse	133,910	14,530	148,440
Total	178,510	22,700	201,215

Table 4.11: Identified employment need in Reading

- The Housing and Economic Land Availability Assessment (HELAA, November 2017; EV014) takes these figures as the starting point for the assessment of capacity. Including development already completed since 2013, the HELAA identifies specific sites to deliver 112,302 sq m of offices and 112,268 sq m of industry and warehouse floorspace. This represents a surplus of offices and a shortfall of industry and warehousing.
- The Reading Employment Area Analysis (EV010, March 2018) considers whether there is scope to make up this shortfall by more land-efficient development within Core Employment Areas, which was not part of the HELAA assessment. It identified scope to provide between 27,000 51,000 sq m additional industrial and warehouse space through intensification of employment uses within Core Employment Areas. This would be sufficient to make up the shortfall.
- In addition, it is worth noting that, for allocated sites, the HELAA approximates to the mid-point of the range set out in the policy. Therefore, for the three main sites allocated for industrial where there is not yet a permission in place (SR1a, SR1c and SR4e), there is scope for an additional 14,000 sq m of floorspace over the HELAA figure simply by developing at the top of the range specified.
- It is therefore considered that there is scope to meet the full objectively assessed needs for industrial and warehouse floorspace (148,440 sq m) and to provide significantly more than the objectively assessed needs for offices (52,775 sq m).
- Unmet needs have been identified in both Bracknell Forest Borough and Slough Borough for employment development, although these have not been quantified. Bracknell Forest is within Reading's FEMA, but Slough is not. It is possible that other unmet needs will be identified within Reading's FEMA. Whilst no scope has been identified for additional industrial and warehouse space to meet these needs from elsewhere in Reading, the overprovision of offices does represent an opportunity to meet unmet needs from other locations, as the local plan identifies. As the requests to the Council have not quantified the level of need, and as some authorities adjacent to Reading have not reached the stage of assessing whether they will have needs, the specific needs to be met cannot be identified at this stage. However, the priority should clearly be for meeting needs from within Reading's FEMA.

4.28.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• EM1(i) No policy - REJECTED

This approach would give no indication of the scale of employment development to be planned for, and would give no certainty on how proposals would be considered. It would be likely to fail to comply with the NPPF requirement to identify and plan for needs.

- EM1(ii) Provision based on Scenario 1: Labour Demand REJECTED This option would use Scenario 1 from the EDNA, based purely on employment forecasts. However, it would not take account of the housing growth identified, and would not meet the full objectively assessed needs, and as such would not be in accordance with national policy.
- EM1(iii) Provision based on Scenario 2: Past Completion Rates REJECTED This approach would completely change the approach to employment development, because it would mean a very significant net loss in space. Planning on the basis of such a net loss would also be likely to mean substantial capacity to reallocate employment areas for housing and therefore deliver significantly higher housing provision. However, as set out above, this is not considered to be a remotely robust figure on the basis of which to plan, as it contradicts employment forecasts. It would therefore not meet the full objectively assessed needs, and as such would not be in accordance with national policy, as well as leading to a significant loss in employment opportunities within the Borough.
- EM1(iv) Provision based on Scenario 3: Labour Supply + safety margin -PROPOSED OPTION

This approach would plan on the basis of the most robust figures for objectively assessed need available, and as such would comply with the requirements of the NPPF. It would meet needs within Reading, and would provide some scope for meeting unmet office needs from elsewhere, and would provide employment levels that are in balance with the objectively assessed need for housing.

As housing needs and employment needs have been assessed using the same basic employment forecasts, the figures for which the Council currently plan are largely in balance. Significant employment development over and above the levels set out in policy would result in additional need for housing over and above that provided for. This would result in increasing demands on the housing market. It is therefore vital that such developments mitigate these impacts on housing.

4.29 Location of New Employment Development (EM2)

4.29.1 Key Considerations

- The NPPF expects Local Plans to "set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period" (paragraph 21).
- The opportunities for new employment development are largely limited to the town centre (for offices) and the south of Reading (for all types of employment development), as well as existing employment areas. The HELAA (EV014) looks at opportunities for new development, and it is clear that opportunities outside these areas for new employment development are very limited.
- The Reading Employment Area Analysis (March 2018, EV010) considered in detail which existing employment areas should be designated as Core Employment Areas, based on their continued suitability as employment areas and their contribution to Reading's economy. The following locations were identified as qualifying:

- EM2a: Green Park
- North of the M4
- South of Basingstoke Road
- Bennet Road
- North of Basingstoke Road
- Elgar Road
- Richfield Avenue
- Portman Road
- Wigmore Lane
- Bridgewater Close
- Sterling Way
- Marcus Close
- Paddock Road

4.29.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• EM2(i) No policy - REJECTED

This approach would fail to give any locational guidance on new employment development. It could result in development in inappropriate locations where there are significant adverse effects on nearby uses or on the transport system.

• EM2(ii) Focus major office development in the centre and along the A33, other industrial/distribution/storage located along A33 or in core employment areas - PROPOSED OPTION

This option would direct development to those areas where there are already concentrations of employment uses and, in particular, to those areas where accessibility by public transport is high and where there are expected to be further improvements. It sets out a list of Core Employment Areas based on a thorough analysis of the qualities of those areas and the contribution that they make to employment in Reading.

- EM2(iii) Option ii with additional core employment areas REJECTED This approach would identify additional core employment areas in addition to those which have been highlighted through the Reading Employment Area Analysis (EV010). This would potentially have the effect of bringing additional industrial and warehouse uses into areas where such uses may be unsuitable for reasons such as residential amenity or poor strategic access.
- EM2(iv) Option ii with reduced amount of core employment areas -REJECTED

This approach would identify fewer core employment areas than those which have been highlighted through the Reading Employment Area Analysis (EV010). This would put a number of these areas at risk of loss to other uses, particularly housing, which would have significant negative effects in terms of employment levels in the Borough and the balance of the local economy.

4.30 Loss of Employment Land (EM3)

4.30.1 Key Considerations

- The NPPF clearly states that provision should be made to meet employment needs, and that will logically involve the retention of existing important employment sites that help to meet those needs. However, the NPPF is keen to avoid a situation where Local Plans put in place blanket protection of employment areas. Paragraph 22 states that "policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose."
- The Reading Employment Area Analysis (March 2018, EV010) has undertaken a thorough analysis of the suitability of existing employment areas for designation as Core Employment Areas, where the loss of employment land would be resisted. Therefore, protection of those areas would not result in the long term protection of unsuitable sites. The sites identified are set out at paragraph 4.30.1 above.
- Not all employment areas would be identified as Core Employment Areas. Some areas have been identified as particularly suitable for release and to be brought forward for alternative uses, whereas other areas would simply not benefit from particular protection. Approximately 30 ha of the employment land considered in the Employment Area Analysis would be excluded from this definition. On these areas, and on other sites not considered during this process, which tend to be small sites within residential areas, a criteria-based approach is needed.

4.30.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• EM3(i) No policy - REJECTED

This option would leave proposals for loss of employment land to be considered on a case-by-case basis. As the strategic importance of such sites is likely to be generally overlooked in such cases, it is likely that it would lead to much greater loss of employment land for other uses than the plan approach. This would reduce access to local jobs, particularly those with lower skills, and affect the balance of the economy.

 EM3(ii) High level of protection, no strategic release of employment land for housing - REJECTED

This option would protect virtually all land in employment use and would prevent loss for other uses such as housing. This would not be in accordance with the specific provisions of the NPPF to not apply blanket protections to employment land. It would potentially prevent beneficial use of land which has no long-term future as employment land, and which would otherwise become vacant. It would also limit the potential for provision of much needed new housing.

EM3(iii) Less protection for employment land, release more land for housing
 REJECTED
 This option would ultimately have a similar effect to option EM3(i), in that it

would result in a greater loss of employment land for housing than currently

planned for, resulting in a loss of important local jobs and uses which support and provide balance to the local economy.

• EM3(iv) Presumption in favour of retention of employment land in Core Employment Areas with some limited strategic release - PROPOSED OPTION The proposed option seeks to strike a balance between retaining those areas that are genuinely important to the local economy and allowing flexibility for areas that do not have that economic significance to potentially be developed to help meet housing needs. The importance of the areas that would be identified as CEAs is demonstrated through the Reading Employment Area Analysis (EV010). Of those areas not identified as having significance as CEAs, some have been identified in the HELAA as having potential for residential use, and these have been brought forward as allocations elsewhere in the plan. Other areas would be left without employment protection but also without a development allocation, and this will provide flexibility for loss to be justified on a case-by-case basis.

4.31 Maintaining a Variety of Premises (EM4)

4.31.1 *Key Considerations*

- Among the aspirations in implementing the LEP's Strategic Economic Plan (OP003) are to "ensure that knowledge is effectively commercialised and grown in TVB, noting that we have never had a science park and that our network of business incubators and co-working space merits further development" and to "support business growth, recognising the enormous potential that exists within our population of SMEs."
- The ONS produces statistics on business count, grouped by size of businesses. 'Micro' businesses have 0-9 employees and 'small' businesses have 10-49 employees. In 2017 Reading had 6,780 'micro' or 'small' businesses, 97.5% of the total businesses. The vast majority of these (6,275) were 'micro' businesses. In comparison to other authorities in Berkshire, the count of small and micro businesses is relatively low, with Wokingham, West Berkshire and Windsor and Maidenhead each having a greater amount.
- The business count statistics also group together towns and cities, and apply to the urban area rather than for local authority boundaries, which relates much better to the functional area. On this measure, Reading has a much more significant stock of small and micro businesses, and ranked 10th in England and Wales in 2017.
- The vast majority of the enterprises in the figures above will not be located in traditional employment units. However, it does illustrate the importance of small and growing businesses to the local economy, and this will mean having a range of spaces for those businesses that require them to start up and grow. It is difficult to calculate a total space suitable for small businesses, as many of the smallest businesses use space very flexibly, but there are approximately 200 traditional small business units (less than 150 sq m) located on employment areas in Reading Borough, with particular concentrations around Elgar Road, Gillette Way and Acre Road in south Reading, Milford Road and Loverock Road in west Reading and Great Knollys Street in the centre.
- According to the Cambridge Econometrics forecasts that underpinned the EDNA (EV009), wholesale and land transport, storage and post are both expected to experience strong jobs growth in Reading to 2036, totalling 2,145 jobs. These

sectors will generally need space that would fall within the B8 use class. Whilst there is a great deal of such space across the employment areas, there is an existing concentration of reasonably modern B8 space in the south of Basingstoke Road, where access to the strategic road network is highest.

• The Core Strategy (PP004) contains an existing policy (CS12) which seeks to maintain a variety of premises within the Borough, including retention of small and move-on units, and B8 uses in the south of Basingstoke Road. This has largely been successful in maintaining the overall variety of sizes.

4.31.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

- EM4(i) No policy REJECTED This option would not protect the range of sizes of employment space available. It would therefore potentially reduce the range of space available for businesses to start up and grow, and for sectors expected to see significant jobs growth, and would have a detrimental effect on the local economy.
- EM4(ii) Decrease storage and distribution space in the south of Basingstoke Rd, maintain start-up and grown-on space where possible - REJECTED This option would not retain land in the south of Basingstoke Road for B8 storage and distribution uses. However, as demonstrated in the EDNA, additional space for these uses is expected to be needed, so this approach would either lead to a loss, which would affect job growth, or would result in uses being located away from the best access to the strategic road network and therefore HGV movements across much of the urban area.
- EM4(iii) Retain storage and distribution space, increase start-up and grownon where possible - PROPOSED OPTION This option would carry forward the existing approach from the Core Strategy. The need for this approach is arguably even stronger than at the time the Core Strategy was drafted, as there is greater evidence that spaces requiring welllocated B8 space are likely to grow, and with ever increasing demands for

scarce land. There remains a vital need to ensure that the local economy has a balance of different types of floorspace to suit different types of business at different stages of their lives.

4.32 Provision of Housing (H1)

4.32.1 Key Considerations

• The NPPF is clear in its aims to boost housebuilding across the country, and places an onus on local authorities in addressing their needs and accommodating them wherever possible. Local authorities should:

"use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period" (paragraph 47).

• There is a great deal of further guidance in Planning Practice Guidance, and which has emerged through the results of appeals and legal challenges.

However, in essence, it is the job of the Local Plan to objectively assess the need for housing, which means not taking account of policy or capacity constraints, and then use this to set a Local Plan housing provision figure. It is only in setting the provision figure that constraints on supply can be considered, and this needs to be considered in accordance with the NPPF. This housing provision figure also needs to take account of any unmet need from neighbouring authorities.

• The Berkshire (with South Bucks) Strategic Housing Market Assessment (February 2016) (EV011) first set out to define the Housing Market Areas (HMAs) within which each authority sits. In doing so, it considers existing assessments of geographies, house prices and rents, migration patterns, commuting patterns and rental markets. Using a best-fit to local authority boundaries, a Western Berkshire HMA and Eastern Berkshire and South Bucks HMA are defined. Reading sits within the Western Berkshire HMA along with West Berkshire, Wokingham and Bracknell Forest.

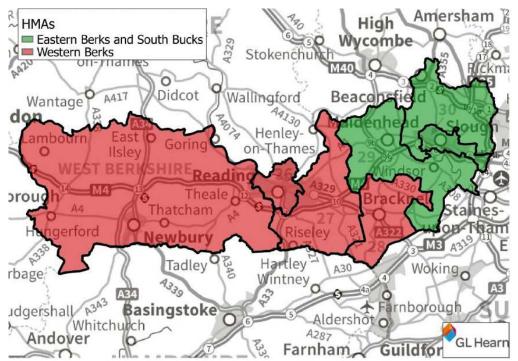


Figure 4.12: Identified Housing Market Areas from the SHMA

- After defining Housing Market Areas, the SHMA assessed the need for housing across each HMA and for their constituent local authorities, using household projections as the starting point, and taking account of potential changes in migration from London, employment projections, affordable housing need and market signals. The need across the Western Berkshire HMA was for 2,855 homes per year between 2013 and 2036. Reading's share of this need is 699 homes per year between 2013 and 2036, a total of 16,077 homes. More detail is included in the SHMA (EV011).
- The three other Western Berkshire HMA authorities have recently commissioned an update to the SHMA from GL Hearn that tests the conclusions of the SHMA against updated figures for matters such as population projections and employment projections, and this reported in March 2018 (EV034). Its main purpose is to provide backing to the authorities' position in appeals, and it is a sensitivity test rather than a set of new objectively assessed needs. Reading was not a commissioning authority for this, partly because it is

working on the basis of the 2016 SHMA figure and does not consider it appropriate to hold up plan production, but also because it does not face the same pressures in terms of appeals that the other authorities do. However, Reading has liaised closely with its neighbours on this piece of work.

• The results of this sensitivity analysis shows that, using more up-to-date or alternative assumptions, the figures would change as follows:

	2016 SHMA	2018 Sensitivity	Change
Bracknell Forest	635	630	-5
Reading	699	759	+60
West Berkshire	665	600	-65
Wokingham	856	801	-55
HMA Total	2,855	2,790	-65

- Therefore, whilst use of these figures reduces need within the HMA overall, it pushes it up substantially in Reading. The principal reason for this is that the Sensitivity Analysis uses a mid-point between two sets of employment projections, Cambridge Econometrics (CE) and Oxford Econometrics (OE), rather than CE figures used in the SHMA. The reason for taking this mid-point does not seem to be particularly robust, certainly in comparison to the SHMA, which includes a local economic sense-check of the CE figures by Wessex Economics based on local understanding, that ultimately resulted in some adjustment of the figures. For that reason, the Council considers that, whilst the most recent work represents a useful understanding of the sensitivity of the figures to different assumptions, it does not supersede the SHMA.
- None of the four authorities within the Western Berkshire HMA currently regard the figures generated by the update to the SHMA as being a new set of objectively assessed needs that supersede the 2016 SHMA. The OAN that the authorities are currently working to are the figures from the 2016 SHMA, albeit that in the case of Wokingham there have been revisions to these figures as a result of appeals. The authorities also anticipate that the new NPPF will be published in summer 2018 and from then onwards, the government's new standard methodology will replace these OAN figures.
- At the same time, the government has consulted on a standard methodology for calculating housing need as part of its consultation on Planning for the Right Homes in the Right Places. At the time of publication of that consultation, use of the standard methodology would have indicated a need of 611 dwellings per annum in Reading. In overall terms, for the Western Berkshire HMA, the annual need would be 2,702 as compared to 2,855. This methodology is clearly subject to potential change. It has been made clear that Local Plans will not need to take account of this methodology if submitted before 31st March (or publication of a revised NPPF), so while it is useful context for the Reading Local Plan, it is not the figure that the plan is expected to work to.
- The Council continues to consider that the need in the 2016 SHMA is robust, and proposes to plan on that basis. The update provided a useful sensitivity test, but it is considered that there are methodological approaches which are not as rigorous as in the original SHMA. The standard methodology, meanwhile, is not yet in place.
- The Housing and Economic Land Availability Assessment (HELAA; EV014 and EV015), initially published in April 2017 and then again in November 2017, was used to assess the degree to which the identified need for 699 homes per year

between 2013 and 2036 could be accommodated within Reading. This takes account of completions between 2013 and 2017, planning permissions and other sites including existing and potential allocations. In all, the HELAA assessed almost 350 sites, covering almost a quarter of the Borough, and therefore represented a very thorough assessment of the potential for development. Sites were considered for their suitability, availability and achievability, using a methodology that had been agreed by five of the Berkshire authorities. The initial conclusion of the April 2017 HELAA was that Reading could accommodate 658 homes per year, resulting in a small shortfall of 943 dwellings in total over the plan period. However, the HELAA was revised in November 2017, including through re-assessing assumptions in conjunction with other authorities in the HMA, and concluded that Reading could accommodate 671 homes per year, resulting in a reduced total shortfall of 644 homes over the plan period. These figures form the basis for the policy.

- In terms of the shortfall, the approach is generally that unmet needs should be accommodated within the HMAs where they arise. The Western Berkshire HMA authorities had already committed to the principle of meeting needs within the HMA in the West of Berkshire Spatial Planning Framework (OP004). Reading Borough Council therefore made a formal duty to co-operate request in January 2017 to Wokingham and West Berkshire to consider meeting some or all of this unmet need. With both authorities at an earlier stage of planmaking and not having carried out full assessments of their capacity, neither authority was able to commit to this. This is still the case at the time of submission.
- Without agreement from neighbouring authorities to accept a specific figure of Reading's unmet needs, agreement was instead sought through a Memorandum of Understanding. The MoU was signed by all four Western Berkshire HMA authorities in October 2017. It recognises firstly that there will be a level of unmet need from Reading, states the principle that need arising from the HMA should be met within its boundaries, agrees that for this reason there will be no need for Reading to seek to accommodate this unmet need beyond the HMA boundaries, and commits the authorities to working together to meet needs including unmet needs from Reading. This MoU is included within the Duty to Co-operate Statement (EV001).
- Reading is therefore planning to meet the vast majority of its housing needs within its boundaries. There will be a small shortfall of 644 dwellings to be accommodated elsewhere within the HMA, and there is recognition of this by the other three HMA authorities and a commitment to working together to accommodate that shortfall. It should be noted that, if Reading's need were to increase with any differing assumptions, this would simply result in an increase in the size of the shortfall.

4.32.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• H1(i) No policy - REJECTED

The NPPF makes clear that the provision of housing to meet identified needs is absolutely central to planning. A Local Plan that did not set out the level of housing required would have no chance of being considered sound or compliant with national policy, and there would be no way of adequately setting out policies for all kinds of matters such as provision of services and facilities, employment, transport infrastructure and much more besides without an indication of housing development expected.

- H1(ii) Provide 671 dwellings per annum PROPOSED OPTION Following the methodology above, it is considered that the maximum provision for housing that Reading can accommodate between 2013 and 2036 is 671 dwellings per annum. This approach is considered to comply with national policy and has been based on considerable co-operation. A policy should set out that the shortfall should be accommodated within the remainder of the Western Berkshire HMA, in line with agreements across the area, and should commit the Council to working together to ensure that these unmet needs are met.
- H1(iii) Provide less than 671 dwellings per annum REJECTED This approach would not be supported by the evidence in the HELAA, as it would result in under-delivery against Reading's potential. It would therefore fail to comply with NPPF paragraph 47, and would not make a sufficient contribution to meeting the serious need for housing, including affordable housing, arising in Reading.
- H1(iv) Provide 699 dwellings per annum as identified in the SHMA -REJECTED

This would meet the full need for housing assessed in the SHMA, and, in that sense at least, it would comply with paragraph 47. However, meeting these needs would result in unacceptable impacts that would mean that the development could not be argued to be 'sustainable' as defined in the NPPF. Depending on how the additional homes were accommodated, these impacts could be on the natural environment, heritage assets, the character and distinctiveness of Reading, residential amenity or flood risk, or a combination of all of those matters. It could potentially mean a loss of other uses such as employment, which in that case would mean that Reading would instead fail to meet its objectively assessed employment needs.

• H1(v) Provide significantly more than 699 dwellings per annum as identified in the SHMA - REJECTED

This approach would have the same effects as option H1(iv), but to an even greater extent. As previously set out, it would not result in sustainable development as defined in the NPPF.

4.33 Density and Mix (H2)

4.33.1 Key Considerations

Housing Density

- In meeting the identified needs for housing, the NPPF states that planning policies should "set out their own approach to housing density to reflect local circumstances" (paragraph 47).
- Reading has a high existing population density, with 38.5 people per hectare at the time of the 2011 Census, compared to 4.5 across the South East and 3.7 in England and Wales as a whole. In terms of dwellings, there are almost 69,000 dwellings in Reading in 2017, and with an overall size of 4,020 hectares that equates to an average of 17 dwellings per hectare, although of course that also

covers significant areas of open space and primarily commercial areas, so the vast majority of Reading's residential areas are at a much greater density.

- The council's existing approach to density is set out in policy CS15 of the Core Strategy (Location, Accessibility, Density and Housing Mix). This included a table setting broad expectations on density. Town centre sites were expected to be developed at more than 70 dwellings per hectare (dph), urban sites had a range of 40-75 dph, accessible suburban was 35-55 dph and less accessible suburban was 30-50 dph.
- Work which was undertaken to inform the approach of the HELAA looked at density of recent developments, and was based on a representative sample of 55 new-build developments that were completed between 2012 and 2017 or were under construction at 2017. This found that the average new-build density across Reading was 74 dwellings per hectare, which is close to the top of the urban range. This breaks down as follows:
 - Town centre average: 325 dph
 - Urban average: 72 dph
 - Suburban average: 42 dph

Therefore, whilst suburban development has taken place broadly within the expectations of Core Strategy policy, the average for urban sites has been towards the top of the range, and town centre sites have averaged very significantly above the minimum level set.

Housing Mix

• The NPPF states that local plans should:

"plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)"

It further states that plans should:

"identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand" (paragraph 50).

The existing size of occupied dwellings is set out in the Census 2011, and is reported in tables 97 (for the whole study area) and 98 (for the Western Berkshire HMA) of the Berkshire (including South Bucks) SHMA (EV011). In terms of the overall Western Berkshire HMA, 12.2% of space is 1-bedroom, 24.2% is 2-bedroom, 37.7% is 3-bedroom and 25.9% has 4 or more bedrooms. Affordable housing tends to have fewer bedrooms than market housing. However, Reading has a greater representation of smaller homes than its neighbours. At 2011, 45.2% of households in Reading were living in accommodation of 1-2 bedrooms, which is the 9th highest level in the South East, and is well above the averages for the South East of 38.1% and for England and Wales of 39.4%.

	Households	Proportion
1-bedroom	10,145 16.1	
2-bedroom	18,285 29.1	
3-bedroom	24,063	38.3
4-bedroom	7,356	11.7
5-bedroom	3,020	4.8
TOTAL	62,689	100

 Table 4.13: Household size by number of bedrooms in Reading at 2011
 (derived from Census 2011)

- The size of recent development has for the most part been significantly smaller than the average. Work undertaken to support the Sites and Detailed Policies Document showed that, of the 5,670 homes built between 2001 and 2008, 4,794 (84.5%) were smaller dwellings of 1 or 2 bedrooms, whilst 4,704 (83.0%) were flats as opposed to houses. This domination of the recent pipeline by small flats led to the Council taking the position in policy DM5 of the SDPD, where the requirement for new-build is for 50% or more of developments outside designated centres to be 3-bedrooms or larger, and 50% or more to be houses rather than flats. Given that a great deal of development inside centres, or for conversions, did not need to comply with that policy, it was not expected that this approach would lead to a full rebalancing in favour of larger homes, but it was intended to ensure that developments contribute to the need for larger homes where they can.
- The SHMA looked at needs for different sizes of homes across the plan period, based on a demographic-driven approach and taking account of the existing stock of housing. Its main conclusions relate to the respective Housing Market Areas. Table 4.14 comes from section 8 of the SHMA, and shows broad indications of the estimated size of dwellings required across the HMA. It shows a requirement for a majority of dwellings to be larger (3-bed or more). For market housing, this requirement for larger housing is more marked, whilst a different conclusion is reached for affordable housing, where the majority of the requirement is for less than 3-bed.

	1-bed	2-bed	3-bed	4+ bed
Market	5-10%	25-30%	40-45%	20-25%
Affordable	30-35%	30-35%	25-30%	5-10%
All housing	15%	30%	35%	20%

Table 4.14: Size of homes needed in Western Berkshire HMA 2013-2036 (Source: Berkshire SHMA)

• The SHMA also includes modelling work for individual local authorities that can give an indication as to requirements, although it does not translate these into recommended bands as it does for the HMAs. For Reading, the conclusions broadly reflect the conclusions of the wider HMA for market housing, although for affordable housing there is a somewhat greater emphasis on smaller homes. In overall terms, Reading needs an almost even split of smaller (1-2 bed) and larger (3+ bed) homes.

	1-bed	2-bed	3-bed	4+ bed
Market	10.4%	29.6%	41.5%	18.5%
Affordable	43.4%	32.9%	21.6%	2.1%
All housing	18.6%	30.5%	36.5%	14.4%

 Table 4.15: Size of homes needed in Reading 2013-2036 (Source: Berkshire SHMA)

• This requirement needs to be considered in the context of what is likely to be delivered on the ground. Figure 4.16 shows the results of monitoring the size of new dwellings permitted between 2012 and 2017. This shows the degree to which Reading's new-build housing development is dominated by smaller dwellings, particularly flats. Over that period, 71.6 new-build dwellings permitted were less than three bedrooms, and 66.7% of dwellings were in the form of flats. It should be noted that, when conversions and changes of use are also considered, the domination of these forms of development would be even more acute, as conversions and changes of use, particularly through the prior approval route, are almost always for smaller flats.

	2012- 13	2013- 14	2014- 15	2015- 16	2016- 17	TOTAL
1-bed flat	250	34	34	51	75	444
2-bed flat	290	120	44	76	220	750
3-bed flat	0	1	0	12	1	14
4-bed flat	0	0	0	0	2	2
5-bed flat	0	0	0	0	0	0
1-bed house	0	6	0	1	2	9
2-bed house	26	30	14	4	21	95
3-bed house	121	46	15	13	95	290
4-bed house	45	25	8	4	102	184
5+ bed house	16	2	3	3	1	25
Total flats	540	155	78	139	298	1210
Total houses	208	109	40	25	221	603
Total 1-2 bed	566	190	92	132	318	1298
Total 3 bed +	182	74	26	32	201	515
% Flats	72.2	58.7	66.1	84.8	57.4	66.7
% Houses	27.8	41.3	33.9	15.2	42.6	33.3
% 1-2 bed	75.7	72.0	78.0	80.5	61.3	71.6
% 3+ bed	24.3	28.0	22.0	19.5	38.7	28.4
Total	748	264	118	164	519	1813

Table 4.16: New-build dwellings permitted by size and type 2012-2017

• Ultimately, with around half of new dwellings to be delivered in central Reading where there is limited scope for larger dwellings, and with high densities required in order to meet as much as the need for additional dwellings as possible, it will simply not be possible to achieve a 50/50 split of smaller and larger homes to meet the identified requirements. This would be

the case even if 100% of new-build dwellings outside the centre were required to be 3-bed or more. Therefore, in order to achieve a balance across the Housing Market Area, there will need to be an acceptance that Reading delivers a greater proportion of the need for small homes, whilst other authorities focus more on family housing. This is merely a reflection of what already happens. Reading Borough has high levels of smaller accommodation, in town centre flats and Victorian terraces, with a young population, and as the needs of those households change, in particular as families grow, they tend to move to suburban areas. Some of those suburban areas are within Reading itself, but others (Woodley, Lower Earley, Calcot, Purley and parts of Tilehurst) are within adjoining authorities.

Self-Build

- The Government provides very significant emphasis on providing land for selfand custom-build homes. Paragraph 50 of the NPPF states that authorities should plan for a mix of housing including for those who wish to build their own homes. A range of measures to boost small-scale and self and custom housebuilders were announced in a Written Statement by the Housing and Planning Minister, Brandon Lewis, on 28th November 2014.
- This was bolstered by the introduction of the Self-build and Custom Housebuilding Act 2015. This includes two key statutory requirements for local planning authorities: to maintain a register of those wishing to build their own homes, and a duty to grant permission to enough serviced plots for self and custom-housebuilding to meet the need in the relevant base period. This latter requirement was inserted into the 2015 Act by the Housing and Planning Act 2016. The base periods referred to are the time between the establishment of the register and the time when the 2016 Act came into force, and then every subsequent 12-month period. Not granting sufficient permissions will mean that the Council does not comply with its statutory duty.
- The Berkshire SHMA looked at the need for self and custom-build, but did not find evidence to demonstrate a clear need for additional provision in Reading. However, the Council has now established a self-build register, and the scale of interest in self-build in Reading has increased significantly. In the first base period, up to 30th October 2016, there were 41 entries on the register. However, at 1st March 2019 this now stands at 129 entries. It can be anticipated that this will only increase as word about the register gets out.
- The Council has not previously monitored self-build developments in Reading, so there is no long-term historic data. However, the ability to claim a self-build exemption from the Community Infrastructure Levy does mean that it is possible to understand the level of self-build present in recent permissions. Since CIL was introduced on 1st April 2015, the Council has approved only 14 claims for self-build exemption. As it stands, without a policy in place, there is therefore only a trickle of new self-build permissions coming through the planning system. Therefore, there is clearly the need for a policy if the Council is to stand any chance of meeting its statutory duties under the 2015 Act (as amended).

4.33.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• H2(i) No policy - REJECTED

It is not considered that this approach would be appropriate, as it would fail to plan for the mix of housing needed and fail to set out local approaches to density, which are required by the NPPF. It would potentially lead to continued domination of new housing by small dwellings, and could result in development at inappropriate densities. It would also almost certainly mean a failure to satisfy the statutory duty to grant permission for self-build.

• H2(ii) Continue current policy CS15 - REJECTED

This approach would carry forward the density approach of the Core Strategy (PP004). However, the densities set out in CS15 bear little relation to the current realities of the housing need, and in fact undershoot what has been delivered in recent years, and would mean not fulfilling the potential of sites to help meet housing needs. Continuation of the approach of DM5 in terms of size of dwellings is covered in H2(iv), but it is not considered that the element requiring houses rather than flats can be justified, and it could also mean reducing the ability to meet housing needs.

 H2(iii) Increase density guidelines, 50% of all dwellings 3-bed or more – REJECTED

This approach would increase density guidelines as set out below, but would also seek a requirement for 50% of dwellings to be 3-bed or more across the whole Borough. The purpose of this would be to reflect the need for sizes of homes set out in the SHMA. However, this approach would almost certainly be undeliverable, as there is no prospect of achieving that proportion of 3-bed dwellings in the town centre. The approach would also be internally inconsistent, as compliance with the density approach would mean not complying with the mix approach in locations such as the town centre.

 H2(iv) Increase density guidelines, 50% of 10 or more dwellings outside town centre 3-bed or more - PROPOSED OPTION The proposed option involves setting out expectations in terms of density and mix, including self-build.

For density, the appropriate density can vary quite widely from site to site, and it is considered more appropriate to set out a criteria-based approach. However, indicative densities should be shown which would result in an increase in densities over what is shown in the Core Strategy. In particular for urban sites, there is considered to be scope to seek significantly higher densities than those set out in existing policy, and this will help to achieve higher levels of housebuilding by optimising the potential of sites.

In terms of the mix of sizes of dwellings, it will not be possible to meet the full requirements for larger dwellings identified by the SHMA, due purely to the types of site that Reading will need to rely upon to get anywhere near delivering its full need. This could not be achieved even with 100% of dwellings outside centres being 3-bed or more, and such a requirement would be unreasonably inflexible in any case, and would not allow account to be taken of the circumstances of the site. A more reasonable 50% requirement on such sites, as in the existing policy DM5, broadly reflects the size of homes needed overall across the HMA and ensures a continued supply of family housing. However, it is not considered that the existing policy requirement for at least 50% houses rather than flats should be carried forward. This could act to artificially supress the potential of some sites, and there is not considered

to be sufficient evidence to justify a maximum requirement for flats against the background of the high levels of housing need.

In terms of self-build, there is very little prospect of the statutory duty to grant permission being fulfilled without some form of policy intervention, as evidenced by the very small number of CIL self-build exemptions granted within almost 3 years of operation of CIL. Initially, in the Draft Local Plan, a flat requirement for self-build was consulted upon, but developers rightly commented that the level to be provided depends entirely on the scale of demand on the self-build register, and there is no way of knowing how that will change across the plan period. Therefore a formula has been developed that links provision to the scale of the demand on the register, taking account of the proportion of anticipated development that will be of a form that can provide self-build plots (i.e. development for houses). However, it is also considered that a hard-and-fast requirement would be inappropriate and could be unnecessarily burdensome, so the proposed policy approach is to avoid making this an absolute requirement. This is felt to give the best chance of meeting the statutory duty whilst at the same time avoiding unnecessary burdens on developers.

4.34 Affordable Housing (H3)

4.34.1 *Key Considerations*

- Policy H3 carries forward the existing Affordable housing policies, CS15 and DM6, amalgamating them into a single policy that requires different levels of provision for different numbers of units within a particular site. The requirements essentially remain the same as for the current policies with one or two minor adjustments to reflect updated government policy and definitions. The local plan has been subject to a viability assessment which has concluded that policies and targets related to infrastructure provision and affordable housing when tested against viability considerations will provide competitive returns to a willing land owner and willing developer to enable development to be deliverable.
- Representations to the local plan have highlighted the fact that the affordable housing policy is contrary to government policy on the provision of affordable housing for sites of 10 or less dwellings. Reading Borough Council and West Berkshire Council jointly challenged the original Written Ministerial Statement of November 2014. While the Statement was successfully challenged in the High court, the Court of Appeal judged in May 2016 that it was lawful. However the Court of Appeal did note that in determining the weight to be given to government policy, the decision maker can determine that local circumstances may justify lower (or no) thresholds as an exception to the national policy.
- Reading Borough Council has taken the view that local circumstances in terms of need for affordable housing and challenges in providing such housing with the borough justify no thresholds, as an exception to the national policy. It has argued this point in appeals since the Court of Appeal decision. At the current time a total of 16 appeal decisions have accepted the council's contention that such local circumstances justify the continued seeking of such provision on sites of 10 or less dwellings as an exception to the national policy.
- The Council's statement of case (as updated) which has been submitted as part of the Council's evidence for appeals where on small site affordable housing

was an issue is attached as Appendix 3. While there are a small number of cases where the council's approach was not supported and for which there are good explanations, it is clear that on 16 occasions, inspectors have accepted the case and associated evidence demonstrating that circumstances in Reading should be treated as an exception to national policy. That remains the position and the Council remains of the view that the policy needs to be retained in full.

• Government policy at Paragraph 47 of the NPPF indicates that:

"To boost significantly the supply of housing, local planning authorities should:... use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area,..." (my emphasis)

Paragraph 50 of the NPPF goes on to indicate that:

"where they have identified that affordable housing is needed, set policies for meeting this need on site, ... and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.

- Policy H3 seeks ensure the provision of affordable housing on site to meet the assessed very high need for affordable housing in the area. The main evidence for this need is Section 7 of the Berkshire SHMAA. That evidence is summarised along with other evidence in the Affordable Housing Appeal Statement that is attached to this Background Paper. The Council believes that the policy is sufficiently flexible to take account of changing market conditions particularly where supported by an up to date SPD.
- Paragraph 173 tells local authorities:

"To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing,..."

need to be taken into account. Paragraph 174 indicates that:

"Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing..."

- The policy was prepared in the light of the results of viability assessment. The Background Evidence includes a full viability report prepared by BPS.
- The NPPG on Planning Obligations indicates that contributions for affordable housing should not be sought from small scale and self-build development (Paragraph: 031 Reference ID: 23b-031-20161116, Revision date: 16 11 2016). As indicated above, the Council believes that local circumstances mean that the Borough should be treated as an exception to National Policy in relation to small sites of 10 or less dwellings. Further evidence on this is provided in Appendix 3 to this statement.

4.34.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

 H3(i) No policy - REJECTED This option would fail to plan and provide for the acknowledged high level of need for affordable housing in the Borough, and would therefore fail to comply with the NPPF. It would also fail to set out important development management criteria for assessing relevant applications. It would disproportionately affect individuals in deprived communities with a limited ability to afford housing. A lack of affordable housing can also lead to poor health outcomes, if individuals are forced to live in poor conditions due to high costs. A 'no policy' option would bring significant negative effects in relation to housing provision and deprivation and inequality.

- H3(ii) Provision in accordance with national policy not to seek affordable housing on sites of 10 or less dwellings REJECTED This option would fail to take account of the acknowledged high level of need for affordable housing in the Borough and the fact that, in the case of 16 separate appeals, Inspectors have accepted the council's case and associated evidence that demonstrates that local circumstances justify the provision of affordable housing on sites of 10 or less dwellings as an exception to national policy. The SHMA emphasised the critical need for affordable housing within Reading, thus more ambitious measures are needed. Additionally, much (around 25%) of the residential development within the borough is expected to take place on sites of 10 dwellings or less. This option would require no affordable housing contribution of these sites. This would therefore also have negative impacts with regard to health and inequality.
- H3(iii): 30% of affordable housing on sites of 10 or more, 20% of affordable on sites 5-9 and an equivalent contribution of 10% on sites of 1-4 (with viability considerations)- PROPOSED OPTION
 This option requires on-site provision or equivalent contribution of all new development with levels prescribed based on the number of dwellings. This would significantly increase the amount of affordable housing within the Borough. Any possible negative effects will be mitigated by viability considerations should this requirement result in undue strain on developers. This option would bring significant positive effects with regard to housing provision (13) and inequality (19) with positive effects with regard to health (11). This would bring positive effects with regard to economic activity, as lack of affordable housing is cited by local businesses as a barrier to economic growth (18).

4.35 Build to Rent Schemes (H4)

4.35.1 *Key Considerations*

- Private renting (not rented from the Council or an RP) makes up around 25% (see table 30 of the Berkshire Strategic Housing Market Assessment, Feb 2016, EV011) of the housing market in Reading. In the main, Private Rented Sector (PRS) housing is owned by small private landlords. It is a sector that has grown significantly in recent years with the growth in Buy to Let Investments. It has served growing markets such as the student sector, young professionals and those who cannot afford to buy market price housing in Reading. It also serves households who cannot afford to buy but who also cannot access public sector social and affordable housing, the stock of which has been significantly affected by sales of housing under the Right to Buy, the fall in grant funding for providing new housing in this sector, and other measures and regulations that have detrimentally affected investment in this sector.
- During 2016 and 2017, a number of developers referred to the preparation of schemes for Reading designed specifically for Private Rent. An application was

submitted at the end of 2016 (Lochailort at Thames Quarter, Napier Road, Reading) which proposed a development of 315 units specifically based on an American model of institutionally funded and managed private rented accommodation. This was a relatively high cost scheme with differing viability considerations that affected the considerations around affordable housing provision.

- Decision-making on the application was challenging in the absence of a policy specifically relating to private rented housing. Why do we need such housing? What is its market? It is not referred to as a priority in the Strategic Housing Market Assessment covering Reading. Does it serve a local need or is it intended for wealthy young professionals commuting into London by train on Crossrail when it arrives? Why should we accept such housing when it is not policy compliant and carries an assumption that such schemes cannot afford to provide affordable housing that we know is desperately needed in Reading? Why should such housing take over prime development sites?
- The government has for some time, as part of solving the recognised need to increase the rate of housebuilding in the UK, sought to attract higher levels of institutional investment in building and managing housing. Such organisations play a very limited role in housing in the UK whereas they as significant players in America and continental Europe. The government has therefore promoted what has become known as the "Build to Rent" model. "Build to Rent" is a form of housing provision developed/bought, operated and managed by a single large financial institution as a long-term investment vehicle. It is a model that is strong in the United States and in parts of continental Europe. The government is encouraging it in England as a way of diversifying the market, bringing in different players as developers, achieving higher levels of housing provision and raising standards in the Private Rented Sector. Government policy on "Build to Rent" is evolving, as discussed in more detail below.
- The American model of "Build to Rent" involves high quality accommodation with use of a high level of communal space (large entrance area, roof top gardens, cinema, meeting and dining rooms) and services and facilities. This means that there is a low net to gross floorspace usage in residential accommodation. It does therefore have relatively high costs which have to be set against the investment returns provided by long term rental income. In these schemes, long -term tenancies are advantageous for the owning institution. Such facilities are designed to attract tenants to stay long term (typically 3 or more years) thus reducing running and management costs. That can obviously be a benefit to tenants who often have very little security of tenure in the private rented sector.
- Over the last 2 or 3 years, there have been a number of schemes in cities such as Manchester, Newcastle and, particularly, in London, where the market appears to be growing, with more institutions and investors taking an interest in the product.
- In line with increased interest in such housing, the Mayor of London has set out specific guidance on such housing in his new Supplementary Planning Guidance on Affordable Housing. Southwark Council also have a specific policy (Southwark Local Plan, Preferred Option, June 2017, Amended Policy DM4 -Private Rented Homes) as does the London Borough of Waltham Forest. These policies are set out in Appendices 1 to 3. They formed the starting point for drafting Policy H4.

Existing and Emerging Policy on Build to Rent

 Government Policy is set out in the National Planning Practice Guidance (NPPG - this accompanies the NPPF) as follows:

"How should different development types be treated in decision-taking?

The viability of individual development types, both commercial and residential, should be considered. Relevant factors will vary from one land use type to another.

For residential schemes, viability will vary with housing type, including housing for sale or rent.

Identifying the viability issues for certain types of housing is discussed below in more detail.

The private rented sector

Some privately rented homes can come from **purpose built schemes held in single ownership** which are intended for **long term rental**. The economics of such schemes differ from build to sale and should be determined on a case by case basis. To help ensure these schemes remain viable while improving the diversity of housing to meet local needs, local planning authorities should consider the appropriate level of planning obligations, including for affordable housing, and when these payments are required. So these homes **remain available to rent only**, local planning authorities may choose to explore using planning obligations to secure these schemes for a minimum period of time. Local planning authorities should enforce these planning obligations in the usual way....."

(words in bold for emphasis)

- The NPPG, therefore, indicates a need for local authorities to be flexible in their planning obligation requirements when dealing with applications proposing "Build to Rent." More recently, as part of the Housing White Paper Consultation, the government published a separate response to a consultation specifically on Build to Rent published in 2015. This makes it clear that the government wants to support institutional involvement as part of its objectives to provide more homes and to diversify the market.
- It is clear that the emerging Government policy sees significant benefits in Build to Rent in terms of boosting the supply of new housing by bringing in new investment, improving quality and choice in the private rented sector, and contributing to economic growth through speeding up development.
- The revised NPPF published in March 2018, in its glossary, defines Build to Rent as follows:

"Build to Rent: Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development scheme comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control."

It also makes reference to such schemes providing Affordable Private Rent as the form of affordable housing provision. Mayor of London - New Draft London Local Plan

- While Build to Rent projects have been undertaken in various parts of the country, London has seen the most significant take up to date. Support has been given to Build to Rent by the Mayor of London and various London Boroughs, in emerging local policy. The Mayor believes that such developments can make a contribution to increasing housing supply and attracting new investment into the housing market. It can also accelerate the delivery of sites. For tenants it can offer longer-term tenancies and thus more transparency and certainty. Such housing provides better management standards and much higher quality than mainstream private rented accommodation. The Mayor hopes that it will contribute to raising standards in the sector.
- The Mayor initially published his Draft Supplementary Planning Guidance on Affordable Housing²² which contains a chapter on Build to Rent. This SPG was adopted in August 2017 following extensive consultation. This document has informed policy H13²³ in the New Draft London Plan which was published for consultation at the end of November 2017. A copy of policy H13 is attached at Appendix 4.
- The Mayor recognises that while benefitting the market through diversification, such housing has different economics compared to build for sale housing. It depends on rental income growth over the long term and means that it is difficult for such schemes to compete with build for sale on land costs.
- In order to differentiate Build to Rent from other forms (tenures) of housing, the Mayor's policies (in accordance with emerging government guidance) proposes controls over ownership of the development with requirements to retain the completed development in single ownership and private rental use for a minimum period. These controls made through a covenant are to recognise the distinct economics and viability of "Build to Rent" schemes.
- This emerging national policy and local policy in London on Build to Rent supports the provision of affordable housing as part of such schemes, albeit with an element of flexibility. Differing affordable housing products are being considered Affordable Private Rent or Discounted Market Rent. Both of these appear similar to an Affordable Rent dwelling as they refer to being let at 80% of local market rents. The main difference is that these do not need to be sold to a registered provider. The assumption is that the institution will manage them as part of its single ownership. There is no indication that such provision cannot be made on-site.
- Both the government document and the Mayor's document refer to a minimum period of at least 15 years. However, it is suggested that this period could be longer (Southwark Council has a draft policy proposal that states 30 years). Other commentators suggest a cautious approach until more is known about how such schemes work in the market. However, this is a form of housing that is seeking special treatment and in order to receive such treatment, it needs to be bringing a different product with different benefits for a significant period. Such developments need to avoid the dangers identified in the government's consultation document in its discussion of covenants. The consultation states that the government:

²² <u>https://www.london.gov.uk/sites/default/files/ah_viability_spg_20170816.pdf</u>

²³ https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-londonplan/chapter-4-housing/policy-h13-build-rent.

"Does not want to create a perverse incentive to developers to game the system by rapidly converting a Build to Rent planning application into a for-sale scheme (which is one reason for the practice of adopting covenants."

Other Emerging Local Authority Policy

London Borough of Southwark: The Southwark Local Plan, Preferred Options was published in June 2017²⁴. It contains amended Policy DM4 on Private Rented Homes. The policy closely follows the original draft policy published by the Mayor of London in his Draft Supplementary Planning Guidance on Affordable Housing. It differs from the Mayor of London policy is some areas, most notably in seeking an element of social rented housing as part of the affordable housing provision and in seeking that residential units are secured in perpetuity for the rental market and for a minimum 30 year term. This was the precedent for the Reading Local Plan Build to Rent policy. A copy of the policy is provided at Appendix 5.

Southwark Council's policy is informed by a study they undertook on Build to Rent in which they referred to work undertaken by BNP Parabas who undertook viability testing of PRS schemes as part of the Housing Policy Viability Study (2015). The study also looked in detail at a number of examples of such schemes in London²⁵.

London Borough of Waltham Forest: The London Borough of Waltham Forest • published its Draft Affordable Housing and Viability Supplementary Planning Document in October 2017. The SPD²⁶ includes a section. Section 9, on Build to Rent and Affordable Housing Contributions. The provisions very much follow the policy in the Mayor of London's SPG although on affordable housing it seeks a mix of social rent/London Affordable Rent (at circa 50% of open market rent) and London Living Rent, inclusive of all service charges. A copy of Section 9 of the SPD is copied at Appendix 6.

Build to Rent in Reading

- Operators have pointed to the fact that Build to Rent may have benefits for • Reading:
 - it will bring high quality rental accommodation that satisfies a growing market in a transient and mobile employment market;
 - it will consequently have benefits for the Reading economy;
 - it provides a different ownership model to most private rented accommodation that currently exists;
 - it will provide longer tenancies;
 - it is likely to lead to the early provision of additional housing in what is becoming an uncertain housing market;
 - it may bring higher guality and better managed accommodation and associated services to the private rental market, competing with other

²⁴ <u>https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-</u> policy/development-plan/local-plan?chapter=4 ²⁵ https://www.southwark.gov.uk/assets/attach/5870/EB09%20-

^{%20}Southwark%20Private%20Rented%20Sector%20Report%20(2015).pdf

²⁶https://www.walthamforest.gov.uk/sites/default/files/UPDATED%20Draft%20Affordable%20Housing%20an d%20Viability%20SPD.pdf

forms of private rented accommodation that is not always of the highest standard.

- However, such housing does seem to come with relatively high rents so may not serve local needs. From what we have seen so far, this form of housing is likely to serve a wider area market that will take advantage of the excellent access and links to London and elsewhere. The extension of Crossrail (The Queen Elizabeth Line) to Reading will, in addition, provide very good direct access from Reading to large parts of London when it opens in 2019.
- The policy as drafted has used the above policies as the starting point. It has also had regard to the draft revised NPPF which makes specific reference to Affordable Private Rent Housing, 3 year tenancies and to professionally managed stock in single ownership and management control. These are matters on which we have received a number of representations and on which the government is now giving a clear view.

4.35.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• H4(i): No policy - REJECTED

This option would fail to provide for Reading's housing needs and would disproportionately affect individuals in deprived communities with a limited ability to afford housing, many of whom rent privately. A lack of affordable or flexible housing can also lead to poor health outcomes, if individuals are forced to live in poor conditions due to high costs. A 'no policy' option would fail to deal with an emerging form of housing provision and add to levels of deprivation and inequality. It may also have negative effects with regard to health. Energy use may also see negative effects, since many privately rented homes may not meet high environmental standards. The lack of affordable or flexible housing may bring negative effects to the economy (18).

• H4(ii): New policy - PROPOSED OPTION

This option establishes policy for build-to-rent housing. This would improve the ability of policy to respond to emerging models of housing provision within the Borough and require energy efficiency and safety. This would expand housing options and decrease inequality as well as improve the economy. Health and energy use would also see positive effects.

4.36 Housing Standards (H5)

4.36.1 Key Considerations

The Secretary of State for Communities and Local Government used a Ministerial Statement on 25th March 2015 to change and rationalise the way that planning policy should seek specific standards in new housing. The Statement²⁷ introduced new additional optional Building Regulations on water and access, and a new national space standard. Local authorities would be able to apply these standards where they have included a policy in their Local Plan. The Statement clarified that other standards regarding the construction, internal layout or performance of new dwellings should not be applied, and

²⁷ https://www.gov.uk/government/speeches/planning-update-march-2015

withdrew the Code for Sustainable Homes. The provisions of the Statement are to be included within the revised version of the NPPF.

• The Council wish to be able to apply these standards, and therefore a policy setting these requirements is needed.

Space Standards

- The Nationally Described Space Standards²⁸ are the only of the new technical standards on housing that would be implemented through planning powers rather than the building regulations. These set out the minimum gross internal area of various types of dwelling, dependent on number of bedrooms, bedspaces and storeys, in addition to some other parameters, e.g around dimensions of bedrooms.
- Planning Practice Guidance identifies three means of establishing a need for adopting the space standards: need, based on the size and type of homes being built in the area; viability; and timing.
- The Viability Testing Report of the Local Plan (EV006) builds scenarios for viability testing based on a range of specific developments in Reading. This includes a number of planning permissions that are expected to make up some of Reading's supply in coming years. Therefore, it is possible to look in detail at those permissions that have fed into the viability testing and assess whether or not they would comply with the nationally described space standards. This also addressed the need to look at the homes currently being built in the area.
- However, when examining recently completed and permitted developments in Reading, it becomes clear immediately that, by-and-large, developments in central Reading do not meet these standards. There are exceptions, but there do appear to be intrinsic difficulties in meeting those standards in the type of development which takes place in the centre of Reading. As the delivery of the level of housing set out in the Local Plan depends on delivering around half of new dwellings at high density in central Reading, it is clear that adoption of the space standards across the board would present a likely obstacle to delivering the housing required. Central Reading therefore should be excluded from any requirements.
- Outside central Reading, a sample of the schemes that fed into the Viability Testing Report has been assessed, making up a reasonable cross-section of different types of site that would be expected in the future, but with a focus on the types of site where there is most likely to be an constraint on meeting space standards, for instance upper floor residential development within district centres, and small infill areas around the fringe of the town centre. It is important to note that, since the space standard has not been in place so far, one would not expect every scheme to comply, and it is not necessarily a fundamental issue if there are a limited number of developments that do not. Figure 4.17 shows the results of this assessment

²⁸

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_S pace_Standard____Final_Web_version.pdf

Ref	Development	Units	Site (ha)	Density (dph)	Bed	Person	Required GIA (sq m)	Actual GIA (sq m)	Complies?
130795	86 York Rd	1	0.01	100	3-b	5-p	93	107	Yes
141116	57 Baker St (2-bed units)	2	0.17	53	2-b	4-p	79	78.1	No
141116	57 Baker St (3-bed units)	7	0.17	53	3-b	6-p	108	115	Yes
130882	Land at Addison Rd	5	0.07	71	3-b	5-p	99	89	No
162034	35 The Grove	1	0.02	50	4-b	7-р	121	155	Yes
152313	10 Prospect St	2	0.09	22	2-b	4-p	70	68.1	No
151847	361-363 Oxford Rd (2-bed units)	2	0.27	15 [†]	2-b	4-p	70	74	Yes
151847	361-363 Oxford Rd (1-bed units)	2	0.27	15	1-b	2-р	50	56	Yes
160342	36-46 Mason St	5	0.06	83	1-b	1-p	37	30	No
150412	9 Thornton Rd and 37 Gordon Place	2	0.05	40	2-b	4-p	79	101	Yes
121506	Former Arthur Legge Centre, Wolsey St (2-bed units)	6			2-b	4-p	70	70	Yes
121506	Former Arthur Legge Centre, Wolsey St (1-bed units)	1	0.07	100	1-b	2-p	50	51	Yes
121506	Former Arthur Legge Centre, Wolsey St (studio)	1			1-b	1-p	39	42	Yes
140997	St Martins Precinct Block A (2-bed 4-person units)	10		+	2-b	4-p	70	75*	Yes
140997	St Martins Precinct Block A (1-bed units)	6	0.08	213 [†]	1-b	2-р	50	53*	Yes
140997	St Martins Precinct Block A (2-bed 2-person unit)	1			2-b	2-р	61	81	Yes
140997	St Martins Precinct Block B	4	0.14	29 [†]	1-b	2-р	50	56	Yes
140997	St Martin's Precinct Block D (2-bed units)	8			2-b	4-p	70	75*	Yes
140997	St Martin's Precinct Block D (1-bed units)	8	0.13	123 [†]	1-b	2-р	50	53*	Yes
140997	St Martin's Precinct Block D (2-bed top-floor units)	3			2-b	4-p	70	84	Yes
121448	85 Cressingham Rd	4	0.08	50	2-b	4-p	50	58	Yes
150872	41 Brybur Rd	1	0.04	25	2-b	4-p	79	83	Yes
151577	8 Cressingham Rd	2	0.04	50	3-b	4-p	84	87	Yes
160255	74 Northcourt Ave	1	0.1	10	4-b	8-p	124	158	Yes
160822	219 Hartland Rd	1	0.04	25	3-b	5-p	93	96	Yes
150885	40 Silver St (2-bed units)	8	0.11	127	2-b	4-p	70	69	No
150885	40 Silver St (1-bed units)	6	0.11	121	1-b	2-р	50	44	No
151942	68 Swainstone Rd	1	0.01	100	1-b	2-р	58	72	Yes

Figure 4.17: Compliance of a sample of non-central Reading schemes against the nationally described space standards

*For these schemes, an average of the unit size is taken. In each case, no single unit fell below the expectations of the space standards [†]Mixed use site with other ground floor uses - densities likely to be higher in reality

- It can be seen that in the majority of cases in the sample, development in Reading outside the centre is already meeting the space standards in terms of total GIA. This is the case across a range of densities, with compliant schemes being delivered at well above 100 dwellings per hectare. Of the developments listed above, there are only five sites where the space standards would not have been complied with for all of the units. Of these, some developments (57 Baker Street, 10 Prospect Street and the 2-bed units at 40 Silver Street) have only failed to meet the requirements by less than 2 sq m, and, had the space standards been in place, rectifying this would have been likely to have been relatively straightforward. The table above deals with the overall GIA aspect of the space standards. In general, there were no particular issues meeting the other aspects of the standards, such as bedroom dimensions. Therefore, it is clear that there would be no fundamental issue in meeting the space standards on non-central sites.
- The importance of achieving the space standards on sites where they can be delivered is even more important set against the amount of housing that is likely to come forward on sites where they cannot be. As well as the approximately 50% of new dwellings that will come forward on constrained town centre sites at high density, and conversions and changes of use not subject to this policy, there are also forms of development that do not require planning permission. In general, new dwellings coming forward through office to residential prior approvals tend to be very small and often, in terms of internal space, well below what might have been approved even without the space standards in place.
- In terms of timing, the Council first indicated that it would be seeking compliance with the nationally described space standards in the Draft Local Plan in May 2017 (although it was Issues and Options in January 2016 which first raised the possibility). Assuming adoption of the Local Plan shortly before the end of 2018, this will have meant that there were 18 months between this first being flagged up and its actual implementation. This is considered to be adequate to have informed emerging development proposals.

Water efficiency

- In terms of water efficiency, all new development must meet the minimum standards in the Building Regulations (125 litres/person/day). However, the optional technical standard introduced by the Ministerial Statement states that Local Plans can specify that development should meet a stricter optional standard of 110 litres/person/day.
- Planning Practice Guidance (56-015-20150327) states that justification for adopting this stricter standard should be based on existing evidence, consultation with the local water and sewerage company, the Environment Agency and catchment partnerships, and information on viability and housing supply.
- The Environment Agency has mapped areas which are particularly subject to water stress, and this is set out in their Water Stressed Areas Final Classification (July 2013)²⁹. This identifies the Thames Water area, within which Reading sits, as under serious stress, both currently and in all future scenarios.

²⁹ <u>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf</u>

- The Thames River Basin Management Plan (December 2015)³⁰ identifies demand management measures as being necessary to address changes to the natural flow and level of water and therefore to achieve objectives of the plan.
- In April 2015, Thames Water produced a Water Services Infrastructure Guide for Local Planning Authorities, to give advice on Thames Water's involvement in the planning system. Water efficiency is one of the issues addressed in the Guide, and it gives clear support for local authorities in pursuing stricter water efficiency standards. Paragraph 4.22 of that Guide states that:

"Paragraph 014 of the Planning Practice Guidance (revised 27th March 2015) advises that where there is a clear local need, LPAs can set local plan policies requiring new dwellings to meet the tighter Building regulations optional requirement of 110 litres/person/day. Given that the EA have designated the much of the south-east as an area of water stress, Thames Water considers that there is a clear need for Councils in the south-east to adopt 110 litres/person/day minimum Local Plan policies."

- Given the above, not surprisingly both the Environment Agency and Thames Water have supported the Council's stance in this part of policy H5 through consultation.
- With regard to the likely effect on housing delivery, it is worth considering this approach in the context of the standards that have been sought in Reading for some years. Under existing policies, the Council requires that all new homes are constructed to meet at the minimum Code for Sustainable Homes Level 3, with 50% of provision on major sites going further and meeting CfSH Level 4. The equivalent water efficiency standard for both Code levels was 105 litres/person/day, and therefore it has been expected that new housing development would comply with this since the introduction of the Sustainable Design and Construction SPD in 2011, without any adverse effect on viability. Adoption of the national standard is actually therefore a slight reduction on what has been sought historically.

Emissions

- The NPPF states that Local Plans should support the transition to a low carbon future by planning for new development which reduces greenhouse gas emissions in a way that is consistent with the Government's policies and adoption of nationally described standards. Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. Under the Climate Change Act 2008, the UK has committed to legally binding greenhouse gas emission reduction targets of at least 34% by 2020 and at least 80% by 2050.
- The Ministerial Statement of 25th March 2015 does not introduce any standards around emission levels, and states that standards other than those in the Statement should not be applied. This approach is to be carried forward in the draft NPPF. However, it is worth noting that these clauses in the Statement were based on an expectation that zero carbon homes was to be introduced in the Building Regulations on sites of more than ten homes by 2016, and the Statement re-affirmed such a commitment:

³⁰

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/500548/Thames_RBD_Part_1_river_basin_ n_management_plan.pdf

"We are committed to implementing the zero carbon homes standard in 2016 and in addition to the future strengthening of minimum on-site energy performance requirements we have introduced in the Infrastructure Act 2015 the powers needed to enable off-site carbon abatement measures (Allowable Solutions) to contribute to achieving the zero carbon standard."

It was only after the 2015 general election that this aspiration was abandoned.

- A Climate Change Strategy for Reading was prepared in 2013 (OP007), to cover the period to 2020. This notes good progress in terms of reducing Reading's carbon footprint between 2007 and 2012, against the background of Reading's first climate change strategy. The headline of the Climate Change Strategy is to reduce its carbon footprint by 34% by 2020 compared to 2005 levels. In terms of specific objectives for low-carbon development, the Climate Change Strategy sets out the following:
 - "Buildings in Reading to be built to high standards of energy efficiency incorporating on-site renewable energy where possible;
 - Retrofit energy efficiency measures into Reading's buildings;
 - Improve properties to reduce fuel poverty in Reading;
 - Enable the uptake of Green Deal and associated grants in Reading;
 - Minimise the 'embodied carbon' incorporated in construction projects;
 - Continue to develop planning policies that:
 - support the reduction of greenhouse gas emissions directly and indirectly from the borough
 - reduce the risks of climate change to the communities of Reading"
- There is therefore a clear need to ensure that the energy performance of new buildings makes a major contribution to achieving the aims to which Reading is committed. As such, the Council deeply regretted the decision made after the 2015 general election to abandon the aim of achieving zero carbon homes. This has not deterred the Council from pursuing the aims above, and in Reading, where development activity is strong, there is an opportunity to set and achieve high standards. Zero carbon homes is an achievable standard that, until recently, was intended to be a national requirement within the Building Regulations. The government's principal viability concerns when it was still proposing to move forward with this proposal was on the viability of small sites.
- Zero carbon homes, or carbon neutral development, is being sought elsewhere. The London Plan seeks zero carbon development for both residential and nonresidential development, and this came into force on 1st October 2016. Southampton City Council's amendments to the Core Strategy were introduced in 2015, and contain a similar approach of achieving carbon reduction combined with contributions to carbon offset. Milton Keynes Council has required carbon neutral development for sites of 5 dwellings or more than 1,000 sq m, and again applies carbon off-setting contributions to make up for any shortfall. This is proposed to be carried forward into Milton Keynes' new Local Plan. Therefore, although the policies in Southampton and Milton Keynes date from prior to the March 2015 Ministerial Statement, Reading's proposed position would be in line with these equivalent large towns or cities in the region.

The approach of London provides a good model for how a zero carbon policy could operate in Reading. In recognition that some building types find it harder than others to achieve 'zero carbon' (measuring only regulated carbon emissions), the London Plan applies a 35% carbon reduction target beyond Part L of the 2013 Building regulations and allows the use of carbon offsetting payments. In terms of calculating the appropriate level of payments, there are several methodologies. One of the most frequently cited is the Government's non-traded carbon price central cost cap value for Allowable Solutions of £60 per tonne (set out before the abandonment of allowable solutions). Contributions are to be calculated over 30 years, i.e. £60 per tonne x 30 years equalling £1,800 per tonne to be offset. This figure may then be used to calculate the cost of any residual CO2 emissions that cannot be met by the development on-site. The majority of London Boroughs are requiring payment through Section 106 based on the planning stage calculations, as shown in Figure 4.18. Payments will be due at commencement or upon completion.

£8,000 £7,560 £7,000 £6,000 £5,000 £4,000 £3,210 £3.000 £2,250 £1.800 F1 800 F1 800 £1 800 £2.000 £1 380 £1,000 £0 Cost per Tonne of Carbon

Figure 4.18: Review of Carbon Offsetting Approaches in London - National Energy Foundation, 2016

- A 35% improvement paired with a local carbon offset fund based on the calculations above could provide flexibility and reduced development costs when compared with a strict zero carbon standard. In addition, it could provide finance for local projects to implement measures such as low carbon heating, retro-fitting and renewable technologies for community building or social housing. Reading has a large proportion of older, largely private-sector housing stock with poor thermal comfort, an over-representation of vulnerable adults and levels of poverty significantly higher than the regional average, so a fund that will be focused on retrofitting such accommodation will have significant benefits in terms of Reading's carbon footprint. More detail can be set out in a revised Sustainable Design and Construction SPD.
- As a worked example of what a carbon offset contribution might look like in practice, particularly on the town centre sites which make up such a large proportion of Reading's future housing supply, a recent application at Weldale Street (now approved) which carried out energy and CO2 calculations can be used. This contained 427 residential units, 233 1-bed, 182 2-bed and 12 3-bed. In this case, the contribution would result in a sum of £435,600, or just over £1,000 per dwelling, based on calculations in the Energy Statement. It should

however be recognised that this will vary based on the type of residential development.

1 1901 0 1.17. 1101	rigure 1.17. Herked example of earbeit enset contribution at Heradie et eet							
Target emission	Dwelling emission	Total m ² of	Total carbon	Total				
rate	rate (with 35%	residential	emissions to be	contributions (£)				
(kgCO ₂ /m ² /yr)	target)	development	offset (tonnes					
	-		CO ₂ /yr)					
15.46	10.05	24,052	242	435,600				

Figure 4.19: Worked example of carbon offset contribution at Weldale Street

- In recognition of the Government's focus on avoiding burdens on small developers, in particular noting the possible viability issues on small sites highlighted in the Ministerial Statement, it is considered that zero carbon homes should not be sought on sites of less than 10 dwellings. Instead, requirements in line with the equivalent to the Code for Sustainable Homes Level 4 (19% improvement in emissions over the 2013 Building Regulations levels) are considered more reasonable.
- The proposed zero carbon homes requirement has been incorporated into the Viability Testing Report of the Local Plan (EV006). As would be expected, taking into account the low per-unit carbon offset figure set out above, it has not been found to have an adverse effect on overall development viability.

Accessibility

- In terms of accessibility, there are two separate standards that can be applied

 accessible and adaptable dwellings under part M4(2) of the building
 regulations, and wheelchair accessible and adaptable dwellings under part
 M4(3).
- The Berkshire (including South Bucks) SHMA (EV011) looked at the housing needs of specific groups, and the results are set out in Section 9. There is expected to be a 36% increase in Reading in the number of people with a long term health problem or disability, up to 27,978 in 2036 (see table 120 of the SHMA). However, this encompasses a range of health issues and does not necessarily equate to a need for accessible homes. Of more relevance are the forecast changes in mobility problems amongst people over 65 set out in table 114, based on prevalence data from the POPPI website. The number of people with mobility problems is expected to increase by 78.1% over the plan period in Reading, to 6,254 in 2036.
- Personal Independence Payments (PIP) have replaced the Disability Living Allowance, and Planning Practice Guidance cites PIP claimants as being a potential source of information to support policies requiring accessibility standards. Information is available on an interactive map from the DWP³¹. This shows that, in the South East region outside London, the only authorities with higher numbers of registrations than Reading (5,163) were coastal authorities along the south coast and in Kent, and Milton Keynes.
- Accessible and adaptable dwellings under part M4(2) are a relatively simple set of design measures to enable dwellings to be adapted over time as the circumstances of their residents change. Generally, they can be seen as a replacement for Lifetime Homes. A 'Lifetime Home' was defined as a home which is sufficiently adaptable to allow people to remain in the home despite changing circumstances such as age or disability, and it was based around 16

³¹ <u>http://dwp-stats.maps.arcgis.com/apps/Viewer/index.html?appid=4f2f5d71f682401b9b78ee5c6ea7887e</u>

criteria that can be worked in at an early stage without a substantial cost to developers. Costs for designing to this standard varied, but research by the Chartered Institute of Housing in Northern Ireland and the Joseph Rowntree Foundation estimated that costs would range from £165 to a maximum of only £545 per dwelling, which represented a modest cost.

- The Berkshire Unitary Authorities jointly commissioned a report on the Lifetime Homes: Lifetime Neighbourhoods agenda from WYG, Positive Planning for an Ageing Society (2009), which recommended that all new residential development comply with Lifetime Homes. Based on this, policy H5 of the Sites and Detailed Policies Document (PP006) included a requirement for 100% Lifetime Homes.
- Accessible and adaptable homes are not identical to Lifetime Homes, but they are pitched at a similar level. A briefing by Habinteg in 2015³² sought to analyse how the two related to one another. The conclusion was that "of the specifications set out across all 16 Lifetime Homes (LTH) criteria, 18 have been disapplied or downgraded, whilst 16 have been improved or added."
- It is hard to establish a level of 'need' for accessible and adaptable homes, as, like Lifetime Homes, this is a concept which would allow people to remain in their homes as their circumstances change. By definition, we do not yet know what the need will be. It cannot be calculated on current numbers of elderly people or people with physical disabilities, or even future trends in numbers. It is an approach that would allow any person to remain in their home as time goes on. Therefore, the logical proportion is 100%, because we cannot predict which homes will need to be adapted in the future. Based on this, it is therefore considered that the broad policy approach that has been applied since 2012 should be continued, and that there is no reason to believe that there would be particular issues in achieving it.
- In terms of wheelchair adaptable and accessible homes, it is possible to set out a methodology for calculating the approximate level of provision needed, and this is described below.
- The first stage is to calculate existing unmet needs. Habinteg propose a methodology calculating existing unmet needs in their document 'Towards Accessible Housing A Toolkit for Planning Policy' (<u>http://www.habinteg.org.uk/toolkit-about</u>). Essentially, it applies regional averages for wheelchair user households (2% in the South East) and wheelchair user households with unmet needs (5%) from Habinteg's 'Mind the Step' report to the number of households at 2013. On this basis, it can be estimated that there were 64 households with unmet needs in Reading at 2013.

Figure 4	20.	Estimated	unmet	need	for w	heelchair	user	households	2013
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Households 2013 (SHMA)	% wheelchair user h'holds	Approx no of wc user h'holds	% wheelchair h'holds with unmet needs	Approx no h'holds with unmet needs
63,604	2	1272	5	64

• The next stage is to estimate the needs that will arise over the plan period up to 2036. In this stage, we are trying to apply the changes in mobility problems projected in the SHMA to the base percentages used by Habinteg for estimating

³² https://www.habinteg.org.uk/reports-and-briefings/accessible-housing-standards-2015-824

existing need for wheelchair housing. So the 2% of wheelchair user households in the SE Region from their 2007/8 figures should be expected to increase with an ageing population, and this analysis seeks to understand that. However, the SHMA only looks at changes in mobility issues for the 65+ age group, which represents 60% of wheelchair users, so only this 60% can be changed using SHMA information. This analysis therefore assumes that there is no change in the proportion of households under 65 that will include wheelchair users.

Table 4.21: Estimated need arising for wheelchair households 2013-2036

% change in mobility problems 65+ 2013-36	78.1
% wheelchair user households base year	2
Estimated % of wheelchair households of 65+	60
% of all households that are <65 wheelchair households	0.80
% of all households that are 65+ wheelchair user households base year	1.20
% of all households that are 65+ wheelchair user households 2036	2.14
% wheelchair user households 2036	2.94
Average % over plan period	2.47
Objectively Assessed Need total	16,077
Number of wheelchair homes to meet new arisings	397

• The existing unmet need and the need arising can then be added together to make up the full need, which is set out in table 4.22. This represents 2.86% of the objectively assessed need.

Table 4.22: Estimated total need for wheelchair homes

Unmet need at 2013	Newly arising need to 2036	Total need	Total need as % of OAN
64	397	460	2.86

• However, in practical terms, applying a 3% requirement across the board will not be effective, as many developments would not provide any units at all on that basis. There will need to be a greater reliance on larger schemes if the need is to be met. Therefore, table 4.23 tests a number of thresholds based on the proportion of developments in recent years that have been of various scales.

Table 4.23: Testing options for requirements for wheelchair accessible and adaptable homes

	Dwellings of this size 2010-16	% of comps each size	Homes from which WAC can be sought	% needed
Completions 10+	2048	71.76	11537	3.99
Completions 12+	2028	71.06	11424	4.03
Completions 14+	2016	70.64	11356	4.05
Completions 16+	1960	68.68	11041	4.17
Completions 18+	1928	67.55	10861	4.24
Completions 20+	1928	67.55	10861	4.24

OTAL COMPLETIONS
2854

• Table 4.23 therefore illustrates that, as the threshold for provision of homes under part M4(3) increases, the larger the proportion that must be delivered from the more limited pool of sites. It is apparent that, at a potential level of 4-5%, sites with below 20 dwellings would not make sense, as they would not deliver at least one unit. Therefore, a threshold of 20 should be used, together with a proportion of 5% to allow for differences in the assumptions above. This should enable development in Reading to meet the needs required.

4.36.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• H5(i) No policy - REJECTED

This approach would defer to the Building Regulations for water efficiency, emissions and accessibility, and would result in no requirement in terms of internal space. The environmental performance of new buildings would be significantly poorer as a result. The Building Regulations represent a minimum and would be highly unlikely to result in Reading's achieving a 34% reduction of greenhouse gas emissions by 2020. Additionally, deferring to the standard water efficiency minimum would place further stress on local water resources. New dwellings may be built with internal space that does not provide adequate living space, with knock on effects on health and well-being. This approach would ignore high numbers of aging residents who require accessible and adaptable development, and would result in a need for people to move home as circumstances around their mobility change.

- H5(ii) All new build achieve higher water efficiency standard and at least 19% improvement on building regulations TER; all new build accessible and adaptable, 5% of 20 or more dwellings for wheelchair users - REJECTED The main difference from the proposed option would be to not seek zero carbon homes on major residential developments. Whilst other issues would be addressed, this option would fail to make a necessary contribution to reducing Reading's carbon footprint and helping to meet the serious challenges of climate change.
- H5(iii) All major new build dwellings offset 100% carbon emissions through on-site generation or planning contributions and all others achieve 19% improvement on TER; all new build accessible and adaptable, 5% of 20 or more dwellings for wheelchair users- PROPOSED OPTION The proposed option is to set out a range of standards for new-build housing to meet, based on the considerations above. This will mean all new dwellings meeting the nationally described space standards, stronger water efficiency targets and being accessible and adaptable. All new major developments would deliver zero carbon homes, with the remainder achieving 19% improvement in emissions over building regulations, whilst 5% of dwellings on sites of 20 or more would deliver wheelchair accessible or adaptable homes. These standards will help to deliver a high standard of new homes that meet emerging needs and challenges, without placing an undue burden on developers that affects viability.

4.37 Accommodation for Vulnerable People (H6)

4.37.1 *Key Considerations*

- The NPPF (paragraph 50) states that local authorities should "plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)"
- The most recent Housing Strategy (2009-2014) contains a focus on "Increasing the range and supply of specialist accommodation for older people and disabled adults, reflecting both an aging population and a market shift away from residential care towards supported living options" (p27). It contains a commitment to develop 240 additional extra care units over the period (many of which have been delivered), and also identifies a need to facilitate greater independence for those with learning disabilities.
- More recently, the Council's Adult Social Care Commissioning Intentions 2016-17³³ reasserted the priority of shifting the balance from residential care towards extra care units and supported living, enabling people to remain in their own homes.
- The estimated proportion of people over 75 at 2016 in Reading was 5.7%, lower than for the South East (8.7%) and England and Wales (8.1%), and also lower than for all other Berkshire authorities other than Slough.
- The number of Disability Living Allowance Claimants in 2017 in Reading was 4,190, or 2.6% of the population. This was lower than equivalent proportions for the South East (2.8%) and England and Wales (3.5%).
- The number of households in temporary accommodation in March 2017 was 319, or 4.82 per 1000 households³⁴. This is significantly higher than Reading's immediate neighbouring authorities, and is exceeded in Berkshire only by Slough.
- Numbers of rough sleepers have increased in recent years in Reading, from an estimated 6 in 2010 to 22 in 2016³⁵.
- Chapter 9 of the Berkshire SHMA (EV011) looked at the need for housing for different groups. In looking at the needs for older people, there is expected to be a 63.5% increase in the population of people over 65 in Reading between 2013 and 2036. This is a very significant change and is close to the South East average and above the England average, although it is a lower rate of increase than all other Berkshire authorities except Windsor and Maidenhead.
- The Berkshire SHMA further estimates expected changes in the population with dementia and mobility issues, and predicts an 86.9% increase in dementia and 78.1% increase in mobility problems (Table 114).
- The SHMA estimates the net need for specialist housing for older people in Reading as being 1,189 by 2036. These are included within the overall need

 ³³ <u>http://www.reading.gov.uk/media/5349/Commissioning-Intentions/pdf/Commissioning_Intentions_2016-17_FINAL.pdf</u>
 ³⁴ Local Authority Homelessness Statistics, Commons Library,

http://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-7586#fullreport³⁵ http://www.reading.gov.uk/media/6866/item06/pdf/item06.pdf

for general housing. The need for residential care bedspaces in Reading is estimated at 253 by 2036, which is additional to the overall housing requirement.

• There is an existing policy in the Sites and Detailed Policies Document (PP006) on this matter (DM7), which broadly reflects the emphasis on supporting people to remain within their homes, and moves away from significant increases in residential care.

4.37.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• H6(i) No policy - REJECTED

This option would not plan for the needs of specific groups requiring housing, and would therefore fail to comply with the NPPF. It would also fail to set out important development management criteria for assessing relevant applications.

- H6(ii) Provision of additional 253 residential care bedspaces for elderly people (as identified in the SHMA) with no criteria - REJECTED This option would set out the headline need, but would not include important elements that are necessary for implementing it through the development management process, thus leading to poorly planned development and potential tensions with other uses.
- H6(iii) Provision of additional 253 residential care bedspaces for elderly people (as identified in the SHMA) with criteria PROPOSED OPTION This option would broadly continue a policy approach with an emphasis on new and existing accommodation that enables people to live as independently as possible, which reflects the identified priorities in the Council's approaches to housing and adult social care. However, the SHMA has clearly identified that there are some needs that are expected to increase significantly over the plan period, such as dementia, which will in some cases require additional residential care provision. These needs should be reflected in policy. A new Housing Strategy is expected to be prepared in time, and the policy needs to be flexible to respond to any needs identified, so links to the most up-to-date Housing Strategy within the policy are important.
- H6(iv) Criteria-based policy with no specific provision target identified -REJECTED
 This option would fail to proactively plan for identified needs for specific

groups as set out in the SHMA, and would therefore fail to comply with the NPPF.

4.38 Protecting the Existing Housing Stock (H7)

4.38.1 Key Considerations

• A very significant need for new homes has been identified in the Berkshire SHMA, of 699 per annum, totalling 16,077 between 2013 and 2036. By current calculations, Reading will not be able to deliver the entirety of this need, and is expecting a shortfall of around 644 homes. If existing homes were to be lost

in significant numbers to other uses, this would only serve to further add to the shortfall.

• There is an existing policy in the Core Strategy (PP004) (CS17), which strongly protects the existing housing stock, and this broad approach remains necessary.

4.38.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• H7(i) No policy - REJECTED

This option could result in a significant number of dwellings being lost to other uses, and would make it harder to meet the housing provision set out in H1 and would lead to a greater shortfall in meeting needs. This in turn would fail to comply with the NPPF.

 H7(ii) No loss of residential accommodation unless there are exceptional circumstances - PROPOSED OPTION

This option would ensure that efforts to provide additional homes are not undermined by loss of existing stock, and is therefore a key element of seeking to meet housing needs. However, there is a need for a certain degree of flexibility, to take account of exceptional circumstances, including where a proposal can help to meet identified residential needs but would not be a strict C3 residential use.

4.39 Residential Conversions (H8)

4.39.1 Key Considerations

- The NPPF states that Local Planning Authorities should plan for a mix of housing based on demographic and market trends, of varied type, size and tenure according to the specific needs of particular communities. It also states that Local Planning Authorities make efficient use of land in providing such housing.
- In Reading conversions to flats and houses in multiple occupation has provided reasonably affordable private rental accommodation, particularly for students and other individuals seeking flexibly-let, shorter-term accommodation. Thus, residential conversions have an important role to play in housing supply in Reading. Over the five years between 2012 and 2017, there was a net gain of 170 dwellings as a result of conversions from houses to flats, which is represents around 6% of total completions.
- However, in some circumstances, residential conversions have resulted in poor or inadequate accommodation or led to a significant loss of family housing in particular areas. The cumulative impact of high concentrations of HMOs can harm the character of an area. In some cases, conversions of HMOs back to single family housing can serve to create more mixed and sustainable communities. Thus, policies should seek to strike a balance by allowing the right amount of HMOs in the appropriate locations.
- Existing policy DM8 (Sites and Detailed Policies Document; PP006) has been somewhat successful in ensuring mixed and sustainable communities, although some areas of the town have become inundated with HMOs (particularly around

the University). Since the formulation of DM8, an Article 4 Direction came into force in May 2013 in order to remove permitted development rights to convert a dwellinghouse (C3 use) to a small house in multiple occupation (C4 use) in parts of Redlands, Katesgrove and Park wards. A similar Article 4 Direction has recently been applied to Jesse Terrace. Thus, the updated policy in the Submission Draft includes reference to the use of Article 4 Directions in preventing the proliferation of HMOs.

• A Supplementary Planning Document dealing with Residential Conversions was adopted in November 2013 and details how applications for residential conversions should be assessed, including both small (C4) HMOs and larger (sui generis HMOs). It provides guidance on applications required as a result of the Article 4 Directions mentioned above. An update to this SPD may be pursued in the coming months or years.

4.39.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• H8(i) No policy - REJECTED

Under this option, applications would still be assessed against other policies concerning amenity and character of the area, loss of privacy and provision of on-site car parking and bin storage. However, the absence of a detailed policy would miss an opportunity to minimise negative impacts.

• H8(ii) Continue existing policy - PROPOSED OPTION

This option would rely on the existing policy and SPD that aim to regulate the number of HMOs in specific areas under Article 4. This would help to ensure that communities are sustainably mixed, with housing for both families and individuals seeking flexibly-let properties. Small additions have been made to the updated policy to refer to new Article 4 directions. DM8 (combined with the use of Article 4 Directions) has shown to be effective in preventing oversaturation of HMOs.

• H8(iii) Further restrict HMOs - REJECTED

This approach would result in limiting the amount of smaller, flexibly-let properties in the Borough for individuals seeking shorter tenancy periods. Residential conversions provide additional housing on previously developed sites. Thus, limiting conversions would not make the best use of brownfield land within the Borough and would not fulfil our responsibilities under the NPPF to provide a wide variety of housing types, sizing and tenures.

4.40 House Extensions and Ancillary Accommodation (H9)

4.40.1 Key Considerations

- House extensions are a significant element of the development activity in Reading. For many households, they represent the most cost-effective method of getting more living space as the household grows, as opposed to moving home.
- A very significant number of householder applications are received by the Council every year, covering house extensions as well as other types of home alterations such as dormer windows and outbuildings). Typically between 20-35% of all applications that the Council deals with are housebuilder

applications. In 2016-17, 518 householder applications were received, representing 22% of the total planning applications.

- In May 2013, changes were made to enable certain sizes of extensions to homes to take place without planning permission, after they have gone through the prior approval route. This means that a great many extensions now no longer need permission, as long as there are no objections from neighbours. There were 101 applications for householder prior approval in 2016-17. However, where a neighbour objects, the planning authority must determine if the impact on the amenity of neighbouring properties is acceptable, which means the Local Plan policy may still have a role. No other issues may be taken into account. These rights are currently expected to last up to 2019, although they may be extended.
- The Sites and Detailed Policies Document (PP006) contains policy DM9 on house extensions and ancillary accommodation, which sets out relatively straightforward considerations for these types of development, although it is used in conjunction with other policies, particularly on residential amenity. The Council also has a Design Guide for House Extensions, The policy also covers ancillary accommodation, such as granny annexes, for which there is a small but regular amount of applications in Reading. In general, the aims of the Council include ensuring that elderly people, or other potentially vulnerable groups, can live as independent a life as possible. Granny annexes can have a role to play in facilitating increased independence and avoiding institutional care. The Council should therefore enable such development to take place, whilst ensuring that it would not be a way of introducing a new dwelling that would be likely to be considered unacceptable.

4.40.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• H9(i) No policy - REJECTED

For many issues, there is likely to be sufficient policy protection in the Local Plan on matters such as amenity and design to ensure that development would be of a sufficient quality. However, this approach would not deal with the risk of granny annexes changing their character over time. In addition, the policy on house extensions, more than any other policy, is likely to be one viewed and used by those not familiar with the Local Plan or planning system, and it is therefore helpful in terms of the quality of applications if there is a policy to deal with extensions.

• H9(ii) Existing policy - PROPOSED OPTION

The Local Plan should include a policy based on the existing policy dealing with house extensions in Reading, albeit with some alterations arising as a result of consultation. Because most of the issues associated with house extensions would be covered by proposed policy CC8 on residential amenity, the policy should be limited to considerations of character. It should also ensure that granny annexes remain ancillary to the main dwelling.

4.41 Private and Communal Outdoor Space (H10)

4.41.1 *Key Considerations*

- The NPPF states, as a core planning principle, that planning should "always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings" (paragraph 17). However, there is little more specific relating to the issue out private and communal outdoor space for new residential developments.
- The Council's existing policy is set out in DM10 of the Sites and Detailed Policies Document (PP006). This does not set minimum standards for amounts of outdoor space, but rather states that a functional area should be provided. General indications to guide development proposals, based on the Space around Dwellings SPG which accompanied the 1998 Local Plan, are included, but do not represent policy requirements. The policy has been applied without any particular issues arising since the adoption of the SDPD in 2012.
- Provision of outdoor amenity space can make a key contribution to quality of life and the health and wellbeing of residents. However, with a high existing density of development, and a need to continue to develop at high density to try to meet as much of the Borough's development needs as possible, inflexible minimum outdoor space standards would be very difficult to justify. At least 50% of dwellings will be delivered in the centre of Reading, where expectations of potential residents in terms of outdoor space would be reduced in any case, and there are likely to continue to be developments under prior approval where there is generally no outdoor amenity space provided at all. It is not therefore considered that it would be reasonable, or deliverable, to insist on specific minimum standards on development sites.

4.41.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• H10(i) No policy - REJECTED

Under this option, there would be no requirement to provide any private or communal outdoor space at all. There is no higher level NPPF policy to rely on, and this would therefore mean that much of the development would be provided without any outdoor space at all. This would clearly have a detrimental effect on quality of life and the health and wellbeing of residents.

 H10(ii) Require specific minimum area based on housing size and type -REJECTED

This option specify minimum areas for outdoor space, based on housing size and type, and would likely initially be derived from the figures originally used in the Space around Dwellings SPG. However, this would be an inflexible approach that would likely conflict with the aims of raising densities in key areas such as the town centre, and would therefore be extremely difficult to deliver on the ground. Evidence to support specific standards is also lacking.

 H10(iii) Recommend minimum area, state requirement as 'functional' minimum - PROPOSED OPTION

This option would involve carrying forward the existing SDPD approach which requires functional outdoor space, but only includes specific measurements as an indicative guideline. This would continue to ensure that, where planning permission is required, developments will provide a degree of outdoor space without resulting in inflexible standards that make it difficult to achieve other aspects of the plan.

4.42 Development of Private Residential Gardens (H11)

4.42.1 *Key Considerations*

- Paragraph 53 of the NPPF states that "Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area."
- National policy previously treated residential gardens as previously developed or 'brownfield' land, but this was changed in a new version of Planning Policy Statement 3 published in 2010, to define gardens as greenfield land.
- Table 4.24 shows the number of new dwellings (net gain) delivered on private residential gardens over the 15-year period from 2002 to 2017. It demonstrates that development of residential gardens for new dwellings has, in the past, been a strong source of supply, around 8% of all completions in the last 15 years, but that this has declined significantly since 2010.

Year	Completions on garden land	As proportion of overall completions
2002-2003	27	4.7%
2003-2004	108	14.2%
2004-2005	216	18.4%
2005-2006	37	5.6%
2006-2007	90	14.1%
2007-2008	61	7.3%
2008-2009	89	11.4%
2009-2010	60	8.7%
2010-2011	12	3.7%
2011-2012	4	1.3%
2012-2013	11	2.3%
2013-2014	8	2.2%
2014-2015	30	4.7%
2015-2016	9	1.2%
2016-2017	6	0.8%
TOTAL	768	7.9%

Table 4.24: Completions on garden land

 It is difficult to attribute this decline to any particular change in policy. Although the decline in completions coincides with national policy changes in 2010, in practice a policy change does not tend to filter down into changes on the ground for two to three years, so it is unlikely to be due to this change. The Council's policy on private residential gardens first came into force in 2012. Housebuilding as a whole declined in 2010 due to the recession, but there has not been a re-emergence of garden development. It is more likely that the supply of the easiest gardens to develop has simply dried up.

- In terms of location, the majority of garden land development has been in north and west Reading, where the largest properties with the most significant gardens tend to be located.
- Nevertheless, even if many of the most straightforward possible developments have already taken place, there are still a substantial number of large gardens in Reading. The Local Plan Issues and Options noted that there around 130 ha of land that is within gardens that form plots that are of a scale that could theoretically accommodate new housing. Even though the vast majority of these sites will never be developed due to issues such as topography, access or land assembly, there remains potential for proposals to come forward, and a policy is therefore needed.
- The Sites and Detailed Policies Document (PP006) contains an existing policy, DM11, which sets out the approach to development of garden land. Experience has shown that this policy has been effective in resisting inappropriate proposals whilst still ensuring that high-quality development can take place.

4.42.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• H11(i) No policy - REJECTED

Under this approach there would be a reliance on a number of existing policies within the Local Plan and at national level. The option was rejected because it would not provide a specific policy on residential garden land, which could mean less effective management of residential proposals involving such sites. It would fail to reflect a local expectation of a policy specifically addressing garden land development.

• H11(ii) Restrictive policy to prevent garden development.

Under this approach, all residential development of private residential gardens would be prohibited. Although harm can result from these types of developments, any policy which adopts a blanket 'no' approach would need to be supported by a robust argument of what harm all such development creates. It would very difficult to define reasons why all residential development in private residential gardens would be unacceptable and such a policy could be open to challenge. Such sites, if designed appropriately to a suitable scale and density, can provide good quality housing in sustainable locations, provide a valuable source of family sized accommodation, and contribute to overall housing land supply.

The main concerns raised locally regarding such sites are largely centred on issues of density and character, where proposals are for a scale and type of development which appear to be at odds with the existing established residential area. To introduce this kind of embargo per se, is therefore considered to be out of proportion to the issues.

• H11(iii) Existing criteria-based policy

The Local Plan should continue to include a policy largely the same as the existing approach, which sets out a number of criteria, focussing on character, amenity, layout, design, access, security, family sized accommodation and biodiversity. These are to be applied to determine the acceptability of residential proposals involving the development of private residential gardens.

According to the NPPF, local plans need to provide a clear policy in relation to the acceptability or otherwise of the development of such sites. As there is no national definition, and there is a requirement to define garden land.

Including a specific policy on the residential development of private residential gardens is the preferred approach as it identifies aspects which are specifically relevant to the residential development of private residential gardens. This would be likely to have positive effects with regard to the provision of high quality housing and promoting safer communities, through consideration of layout and design. A specific policy would also ensure, that where proposals are deemed acceptable, that such sites would still contribute to overall housing land supply.

4.43 Student Accommodation (H12)

4.43.1 *Key Considerations*

- The NPPF states that planning authorities should plan for a mix of housing, including the needs of different groups in the community. Students are not specifically mentioned, but are a significant part of Reading's community due largely to the presence of the University of Reading. According to the 2011 Census, there were 14,836 full time students aged 16-74 in Reading, representing 9.5% of the population, significantly higher than the South East average of 6.1% and the England and Wales average of 6.6% (although many of these will be aged 16-18 and still in school). The accommodation needs of this group are therefore a matter of particular local significance.
- Student housing is a matter of some concern locally, particularly where students are housed in general residential areas close to the University. A petition in January 2011 with concerns around the local impact of small houses in multiple occupation (not necessarily specific to students, but based in the areas close to the University) led to the Council making an Article 4 direction in 2012 to control conversions from C3 residential to C4 small houses in multiple occupation in parts of three wards close to the University. Concerns included noise and disturbance, parking, storage of bins and 'to let' signs and the effects of a large student population on the viability of local services to support non-student groups such as families.
- The main Whiteknights Campus of the University of Reading is split between Reading and Wokingham Boroughs. Educational buildings and halls of residence are located within both local authorities, although students in private housing are mainly on the Reading side due largely to this being the location for the terraced properties favoured for student lets. There are also an increasing number of private halls of residence in Reading, particularly in the town centre. There is no existing development plan policy on student accommodation in Reading.
- The Berkshire (including South Bucks) SHMA (EV011; February 2016) sought to examine the needs for additional student accommodation over the plan period. Within Berkshire, the only higher education institution of significance is the University of Reading, and therefore the focus in the analysis was on previous trends and future increase in student numbers as a result of expansion plans at the University.
- The SHMA notes that the number of students at the University peaked in 2008/09 at almost 16,000, and by 2012/13 the number had declined.

However, this is largely a result of far fewer part-time students, whilst fulltime students, who have the greatest housing impact, had slightly increased. There has also been a 25% increase in overseas students between 2002/3 and 2012/13, which is a group more likely to live in halls of residence. In terms of future plans, the SHMA analysis was based largely on GL Hearn's conclusions after discussions with the University. By 2018, student numbers were expected to rise significantly, but only to a similar level to the University's 2008/9 peak. GL Hearn's view was therefore that, with the pipeline of student accommodation, there were not expected to be additional needs.

- Since the publication of the SHMA, the University have sought to contest the SHMA conclusions, in the context of proposing their own scheme for additional student accommodation at the existing St Patrick's Hall on Shinfield Road. This site is included as a proposed allocation for student accommodation within the Local Plan, albeit with a lower capacity figure than proposed by the University. Cushman and Wakefield prepared a note on the additional needs to accompany the (now refused) planning application. This stated that the University has grown full time student numbers by 18% between 2010/11 and 2015/16, which outstrips the national average of 5%. According to this note, the proportion of students of 20 and under is 59% and the proportion of overseas students is 29%, well above the respective national averages of 51% and 23%, and these are groups that are particularly reliant on purpose-built accommodation. The note does not put a figure on the need for new accommodation, but does note that there has been a 16% increase in students living in HMOs between 2010/11 and 2016/16 in response to a lack of purposebuilt accommodation, compared to an 8% increase nationally.
- The above illustrates that getting a handle on the future accommodation needs of students can be difficult, particularly over a 20-year plan period when the University only plans for student numbers five years ahead. Reliable figures for long-term planning are hard to derive, and there is a complex interrelationship of different types of accommodation.
- However, there has been a substantial increase in purpose-built student accommodation in recent years. Table 4.25 below estimates that there has been a net increase of around 1,799 student bedspaces between 2010 and 2017, with a further 797 somewhere in the planning pipeline. In terms of numbers, this increase is broadly similar to the reported and predicted increase in the SHMA between 2010 and 2018 of around 2,900 students. Indications are also that some other existing developments permitted for general housing are in student use. This is of course a very crude comparison that does not take account of changes in the particular nature of those students, or of any pre-existing accommodation issues, and the specific figures should therefore be used with caution, but does show that there has been a significant increase in provision alongside increases in student numbers.

Completed 2010-2017	1799
Newbury, Oxton and Mansfield Halls, London Road	604
Sibly Hall*	-300
Bridges Hall, Whiteknights Campus*	143
Childs Hall, Whiteknights Campus	805
Whiteknights Hall, Whiteknights Campus	355
Land adjacent to Thames House, Regis Park Road	91
60-62 Friar Street and 8-10 Greyfriars Road	141
Wells Hall, Upper Redlands Road	-450
Former Yell House, Queens Walk	410
Under construction (2017)	163
252 Kings Road	129
177 Basingstoke Road	34
Planning permission	127
Trinity Hall, South Street	42
Land at Hillside, Allcroft Road (1)	8
Land at Hillside, Allcroft Road (2)	7
191 Kings Road	14
79 Silver Street	56
Draft Local Plan Allocation (midpoint of range)	507
St Patrick's Hall, Northcourt Avenue	475
Woodley Arms, Waldeck Street	32
TOTAL	2596

 Table 4.25: Net change in bedspaces in purpose-built student

 accommodation

*Location entirely in Wokingham Borough

- One of the main concerns that the Council has is around the provision of private purpose-built student accommodation, particularly in the town centre, where it often uses sites that could have contributed to meeting Reading's very significant and, compared to student accommodation, clearly demonstrable, general housing needs. Completed and permitted developments from table 4.X above that are not on university campuses or on existing or former student residences total 861 bedspaces. Our estimates are that, if these had been developed for general housing, they would have delivered around 263 homes³⁶, of which up to 79 would have been affordable. This would have made a considerable dent in the expected housing shortfall of 644 and would reduce the number of dwellings that Reading would need to export to other authorities in the Local Plan.
- The Cushman and Wakefield note also expresses concerns about whether this specific type of accommodation truly meets the most pressing needs in any case. Cushman and Wakefield state that:

³⁶ This uses the figure of 94 sq m of overall floorspace per dwelling, used to convert floorspace to dwellings in the HELAA in the town centre.

"Private purpose-built accommodation is expensive and does not solve the problem – 98% of the University of Reading's existing accommodation is priced below even the least expensive bed space at CityBlock³⁷, Reading's newest student development."

It is further stated that "There is no incentive for students to move from the housing market into such expensive accommodation".

• The amount of land in existing University use in Reading and just across the boundary in Wokingham is extensive. Whiteknights Campus totals around 120 ha, and, not counting accommodation which has already been provided in the table above, it is estimated that there is at least another 17 ha of land in university or student accommodation use. There are of course a number of constraints on development at all sites, and Whiteknights Campus includes substantial important areas of open space, areas of biodiversity importance and heritage assets, but the Council does not consider that the scope for further development in these areas has necessarily been exhausted.

4.43.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• H12(i) No policy - REJECTED

This option would not respond to what is a clear local planning issue, and would continue to result in ad hoc development of student accommodation in Reading without a clear strategy.

- H12(ii) Locate student accommodation throughout the Borough REJECTED This option would continue to result in student accommodation on a number of sites, many of which might have been used to meet general housing needs, including for affordable housing. This would continue to affect the Council's ability to meet its needs for new housing, and would potentially lead to a need to export additional housing out of the Borough into neighbouring authorities.
- H12(iii) Focus student accommodation close to the university and on campus if possible PROPOSED OPTION

There is clearly a need for a policy that addresses the issue of student accommodation in Reading. The Council is continuing to experience pressure for additional student accommodation in sites, in particular in the town centre, which might otherwise be used to meet Reading's housing needs. As a result, the preference should be for student accommodation to be provided oncampus or within existing sites in university or student accommodation use. However, due to the difficulties in identifying clear figures for accommodation needs, and the potential volatility of student numbers over the plan period, it is appropriate that the wording of the policy allows for needs not anticipated in the plan to be accommodated.

³⁷ 252 Kings Road

4.44 Provision for Gypsies and Travellers (H13)

4.44.1 Key Considerations

- Periodically assessing the housing needs of people living in caravans or houseboats is a requirement for local housing authorities under the Housing and Planning Act 2016 (Section 124).
- Whilst the NPPF states that planning authorities should plan for a mix of housing, including the needs of different groups in the community, the main national planning policy document is Planning Policy for Traveller Sites (2015). This document expects local planning authorities to assess the accommodation needs of gypsies and travellers in their area. Where need is to be met within the authority, the CLG document Planning Policy for Traveller Sites (PPTS, 2015; OP002) states that specific sites must be identified for at least the first five years' need (in this case, 10-11 permanent pitches). For years 6-10 and where possible years 11-15, specific sites or broad locations for growth should be identified.
- Reading does not currently have any authorised sites for gypsies and travellers. Nor are there any long-term unauthorised 'tolerated' sites which could be regularised to help meet needs. There are a number of traveller households in bricks and mortar, and the Council has a history of housing travellers in such accommodation. There is one permitted site for travelling showpeople at Scours Lane, with 6 plots. The national traveller caravan count for Reading in 2017 was 0. However, there has been a significant rise in the number of unauthorised encampments in Reading in the last two years in particular, often on public parks or open spaces.
- Against this background, the Council commissioned arc4 to carry out an assessment of the accommodation needs of gypsies and travellers, travelling showpeople, as well as those dwelling on houseboats. The Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment reported in its final form in September 2017 (EV016). The detail of the need is set out in that document, but in summary the needs that it identified were as follows:
 - A need for 10-17 permanent pitches for gypsies and travellers (10 represents the needs qualifying under PPTS, and therefore the minimum whilst 17 represents the 'cultural need');
 - A need for transit provision of 5 pitches for gypsies and travellers (with each pitch accommodating two caravans);
 - A need for 2 additional plots for traveling showpeople; and
 - No need for additional residential moorings for houseboats.
- The needs for gypsies and travellers arose specifically from those interviewed on unauthorised encampments interviewed as part of the assessment.
- Finding sites for gypsy and traveller accommodation in Reading is extremely difficult. Reading is almost entirely urban, with most undeveloped areas at risk of flooding and therefore not appropriate for caravans under the NPPF. Potential development sites are required to help meet significant housing needs, and would in any case take place as a redevelopment of a site in existing use. There are no existing sites to expand or regularise, and no private sites have ever been put forward for traveller use through the current Local Plan process, or indeed as part of previous development plan documents. Against this background, the Council undertook an extensive exercise to

attempt to identify potential sites, which is described in detail in the Gypsy and Traveller Provision Background Document (EV019; September 2017).

- The result of that exercise was that only one site with potential to meet any of the needs was identified, namely a site at Cow Lane with potential for traveller transit provision to meet the most pressing local need, which is dealing with the increase in unauthorised encampments. A consultation was undertaken in September and October 2017, on both this potential transit site and on the work that had been undertaken on site identification to date (EV017). A Summary of Responses to this consultation sets out the results of this consultation (EV018).
- The Council's position is therefore that, despite substantial efforts to consider all possible sites, it is not possible to meet the identified needs for gypsies and travellers within Reading Borough, with the potential exception of the transit needs (see section 4.86). In recognition of this issue, in February 2018 the Council made a duty to co-operate request to the 8 closest local planning authorities to consider accommodating some or all of Reading's unmet needs. Although authorities generally agree to keep the matter of provision for gypsies and travellers under review, no local authority had indicated a willingness to contribute to these unmet needs. However, the Council considers that its assessment of capacity is robust, and that, regardless of the lack of agreement, Reading will not be able to meet its needs and this will need to be considered through other authorities' Local Plans. More detail on this request, and other relevant matters, is set out in the Duty to Co-operate Statement (EV001).
- In terms of travelling showpeople, the very small need of 2 plots, the longerterm nature of this need, arising as it does from potential future household formation from the existing site, and the presence of an existing permitted site means that there may be scope for needs to be met as an extension to the existing site, and it is not considered necessary for the Local Plan to make specific provision.
- For both gypsies and travellers and travelling showpeople, in the eventuality should sites come forward that have not been anticipated, there is a need for a criteria-based policy. PPTS (paragraph 11) states that such criteria-based policies are necessary both where there is identified need, and where there is not. There is an existing criteria-based policy, CS19, in the Core Strategy which provides a reasonable basis for considering proposals should they be put forward.

4.44.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• H13(i) No policy - REJECTED

This option would not be in accordance with national policy, as it would not provide a criteria-based policy for considering sites for gypsy and traveller provision. Such proposals, should they be made, would likely be controversial and would require a clear set of considerations within a policy.

• H13(ii) Existing policy providing criteria for new sites - PROPOSED OPTION This option would mean setting out a criteria-based policy within the Local Plan for the location of sites for gypsies, travellers and travelling showpeople. This would accord with national policy. The existing Core Strategy policy forms a reasonable basis for such a policy, but requires some amendment to take account of most up-to-date national policy wording, both in PPTS and the NPPF.

4.45 Suburban Renewal and Regeneration (H14)

4.45.1 *Key Considerations*

- Meeting the identified need for new homes will require using those sites which are suitable, available and achievable wherever they arise. One potential source of supply, already highlighted in the Core Strategy, is suburban renewal and regeneration.
- The ongoing development at Dee Park presents a good example of what can be achieved. Dee Park was an ageing estate in West Reading dating from the 1960s and 70s, mainly in Council ownership. The layout was confusing, felt unsafe and represented an underuse of land. Regeneration was a longstanding Council ambition. Outline planning permission was granted in 2010 for a development comprising residential development, new shops and services and a new primary school. Phases 1 and 2 of this development have so far been completed, with 363 homes demolished and 705 constructed (a net gain of 342). The final phase, including demolition of 92 dwellings and construction of 190, as well as the primary school, is yet to commence. If this model could be rolled out to other parts of Reading, it would clearly represent a substantial potential source of growth.
- However, Dee Park had some characteristics that made it an unusually significant opportunity, in terms of underused and neglected spaces and facilities such as garages, as well as the extent of single ownership across much of the site. It cannot therefore be assumed that a similar gain in dwellings can be achieved elsewhere. It must also be stressed that, even with the strong regeneration opportunities that it offered, the development of Dee Park has taken a considerable amount of time to deliver since it was initially mooted around 15 years ago, and this demonstrates the long timescales involved in these types of complex projects, which means that they may not be achievable in a plan period.
- Nevertheless, there are other ageing, primarily Council-owned areas, particularly in West and South Reading, where there may be opportunities for renewal and regeneration, even if on a more limited basis than Dee Park, and it is important that these are supported by policy. The Council continues to keep these opportunities under review.

4.45.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

- H14(i) No policy REJECTED This option would fail to provide necessary guidance to allow opportunities for development to come forward to help deliver homes and regeneration.
- H14(ii) Guidelines for regeneration when opportunities arise PROPOSED OPTION

This option would support proposals for suburban renewal and regeneration as they come forward, and therefore potentially help to boost the supply of housing, as well as result in environmental improvements and enhanced facilities in some areas.

4.46 Achieving the Transport Strategy (TR1)

4.46.1 *Key Considerations*

- The NPPF emphasises the vital importance of transport in achieving sustainable development. Managing patterns of growth to reflect public transport, walking and cycling accessibility is one of the core planning principles, and the NPPF recognises the need to rebalance the transport system in favour of sustainable modes which reduce emissions and congestion.
- Paragraph 32 underlines the need for a Transport Assessment or Statement for developments that would generate significant movements, but does state that permission should only be refused on transport grounds where the residual cumulative effects are severe. Paragraph 36 recognises the importance of Travel Plans in making the most of opportunities for promoting sustainable travel modes.
- The Council's current transport strategy is set out in the Local Transport Plan 2011-2026, known as LTP3 (OP005). This contains the following strategic objectives:
 - To facilitate more physically active travel for journeys in a healthy environment;
 - To improve personal safety on the transport network;
 - To provide affordable, accessible and inclusive travel options for everyone;
 - To ensure that the transport network operates safely and efficiently to meet the needs of all users;
 - To align transport and land use planning to enable sustainable travel choices, improve mobility, reduce the need to travel and preserve the natural environment;
 - To deliver balanced packages of value for money transport solutions and make best use of existing transport investment;
 - To offer sustainable transport choices for the Travel to Work Area and beyond, integrating within and between different types of transport;
 - To improve journey times, journey time reliability and the availability of information; and
 - To reduce carbon emissions from transport, improve air quality and create a transport network which supports a mobile, affordable low-carbon future.
- Among the particular challenges that LTP3 identifies are the efficiency and resilience of the transport network, carbon emissions, air quality, noise, safety and servicing future developments.
- LTP3 considers the whole urban area rather than being restricted to the Borough boundary, and develops a set of local action plans, for the centre, north, east, south east, south, south west and west of the urban area. Within each area action plan, challenges are identified and opportunities for the future listed. Some of these actions involve physical interventions, but others are linked to matters such as better information or engagement.

- The LTP relies upon a number of 'daughter documents' to provide more information on certain matters, such as the Parking Policy and Cycling Strategy.
- Within the existing Core Strategy (PP004), there are several policies that relate to sustainable transport and the transport strategy, namely CS20, CS22 and CS23. The overall approach is in line with LTP3 and national policy, but there is considerable overlap between the policies and scope for consolidation into a more straightforward policy approach.

4.46.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• TR1(i) No policy - REJECTED

This approach would mean that the Local Plan fails to contain any clear policy statement in support of sustainable transport and would not link the plan to the LTP. Whilst there are existing provisions in the NPPF that could be relied upon to some degree, this should be supported by clear local policies to help the shift towards sustainable transport modes.

 TR1(ii) Continue current policy approach (Core Strategy CS20, CS22, CS23) -PROPOSED OPTION

This approach would combine the existing policy approach in CS20, CS22 and CS23 and update it where necessary to take account of the NPPF and revised Local Transport Plan. This will ensure that the Local Plan clearly sets out the need for development to link to the LTP and emphasises the need to prioritise sustainable modes of travel.

4.47 Major Transport Projects (TR2)

4.47.1 *Key Considerations*

- Paragraph 41 of the NPPF states that local authorities should "identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice".
- The NPPF also identifies that strategic policies should deliver the provision of infrastructure for transport (paragraph 156), and that they should take account of the need for strategic infrastructure, including nationally significant infrastructure, within their areas (paragraph 162).
- There are two nationally-significant transport infrastructure projects that relate to areas within Reading Borough.
 - Reading Station represents the westernmost extent of the Crossrail scheme. Crossrail is the new high-frequency rail service across London in an eastwest direction, linking Reading with central London, Docklands, Stratford and as far east as Shenfield in Essex. The scheme is at an advanced stage, and trains are expected to start running from Reading Station in December 2019 at a rate of twice an hour, and four times an hour at peak times. The service is known as the Elizabeth Line. Although significant amounts of land adjacent to the railway line are subject to a safeguarding direction (which will need to be shown on the Proposals Map), there has not needed to be

substantial physical works around Reading station to prepare. More information is available on the Crossrail website³⁸.

- The M4 Smart Motorway scheme is a scheme to transform the M4 between junctions 3 (in west London) and 12 (west of Reading) into a smart motorway. Smart motorways involve relieving congestion by using the hard shoulder for traffic, and utilising technology to better manage traffic flow. Development consent was granted in September 2016, main works on the M4 began in late 2017, and are expected to be completed in March 2022. Works will affect the short stretch of the M4 as it enters the south of Reading Borough, including Junction 11. More information is available on the Highways England website³⁹.
- The Council's Local Transport Plan 2011-2026 (OP005) considers future transport schemes within the context of area action plans for the different parts of the Reading urban area. Many of the actions do not relate to physical change that will need to be highlighted in the plan, but there are a number of individual projects that emerge.
 - Mass rapid transit (MRT) is a longstanding proposal for a new or hybrid public transport system to complement the existing public transport offer, consisting of radial and orbital routes linking the centre and wider urban area, including park and ride sites. The scheme is being progressed in parts.

The first part is South Reading MRT, providing a series of bus priority measures linking Central Reading to Mereoak Park and Ride along the A33 corridor. In some case, land for this has been secured through planning permissions. This is in progress, and most recent information can be viewed on the Council's website⁴⁰.

East Reading MRT would provide a new dedicated public transport link to the east of Reading, linking Central Reading with routes to the east and south east and a proposed park and ride site at Thames Valley Park (in Wokingham Borough). A planning application for a key part of this link, including crossing the Kennet, is under consideration. Information on progress is, again, on the Council's website.

Further stages of MRT will follow, and final routes and proposals are not yet determined. The diagrams in the Local Plan show potential routes.

- Park and ride; the Council has identified a number of corridors where park and ride provision is required to help to relieve congestion within Reading and facilitate a change towards public transport. There are existing park and rides at Mereoak (south of junction 11 of the M4) and Winnersh Triangle, both of which are within Wokingham Borough and opened recently. There is also currently provision at the Madejski Stadium, but this is the site of the Royal Elm Park proposals. Planning permission for a new 277-space park and ride site east of Reading at Thames Valley Park was also granted by Wokingham Borough Council in November 2016.

On other corridors, including those to the west and north, specific sites for new park and ride provision have not been identified, but the Council is continuing to actively seek opportunities for new provision. Given the highly constrained nature of Reading Borough and the scarcity of land within it, it is inevitable that this will involve land in adjoining authorities.

³⁸ <u>http://www.crossrail.co.uk/</u>

³⁹ <u>http://roads.highways.gov.uk/projects/m4-junctions-3-12-smart-motorway/</u>

⁴⁰ http://www.reading.gov.uk/transport-schemes-and-projects

- Green Park station and interchange: This project would provide a new railway station on the Reading to Basingstoke line, to serve the Green Park business park and residential under construction, together with a public transport interchange linked into the MRT network. The most up-to-date planning permission for the station was granted in 2015. Works are due to get underway soon, and are expected to be completed by Summer 2019.
- Cow Lane bridges: These railway bridges over Cow Lane, to the west of central Reading, have long been a bottleneck on the road network, as the roads narrow as they lead under the bridges. Measures to address this issue are the outstanding part of the Reading Station works, and the works are expected to be completed by Summer 2018.
- Crossing of the river Thames: the Council has recognised the need to address the issues caused by crossing the Thames in the Reading area as a priority for many years. The two existing bridges within Reading Borough are congested at many times, with the only other option for vehicular crossing in the immediate vicinity being Sonning Bridge. LTP3 identifies working "with Wokingham Borough Council, South Oxfordshire District Council and Oxfordshire County Council to progress a third crossing of the River Thames".

The Cross Thames Travel Group has been established to investigate the traffic implications and prepare an outline business case for the proposed bridge, led by Wokingham Borough Council in partnership with Reading Borough Council, South Oxfordshire District Council, Oxfordshire County Council, Thames Valley Berkshire LEP and Oxfordshire LEP. The Outline Strategic Business Case for the scheme is complete and shows there is a strong case for a two lane traffic bridge in this location⁴¹. The Cross Thames Travel Group is currently exploring options to fund the next stage of scheme development work, which includes production of the full scheme business case.

The likely alignment of a crossing does not include land in Reading Borough other than the junction to the Henley Road. It would be almost entirely within Wokingham and South Oxfordshire.

- Bus corridors (including bus priority): Reading has a high-quality, comprehensive bus network across the whole urban area. However, where there are no bus priority measures, congestion on roads can lead to delay. The Council will continue to seek improvements to the bus network.
- Further projects, not specifically outlined in LTP3, have also arisen.
 - National Cycle Network route 422 is new national cycle route between Newbury and Windsor, including a section within Reading. The scheme is being developed by Reading Borough Council, Wokingham Borough Council, West Berkshire Council, Bracknell Forest Council and the Royal Borough of Windsor & Maidenhead, and it is included within the Thames Valley Berkshire Local Growth Deal. The route crosses Reading in an east-west direction through the town centre. More information, including the specific works planned, is on the Council's website⁴². Phase 1 is complete and phase 2 is underway, and detail on the final phase is currently being worked up.

⁴¹ http://www.wokingham.gov.uk/parking-road-works-and-transport/transport-and-roads-guidance-andplans/?categoryesctl91f252ff-550d-4cfa-a838-92ef2cb5f83c=10642

⁴² http://www.reading.gov.uk/transport-schemes-and-projects

- Reading West Station Upgrade: The Council has been working with Great Western Railway and Network Rail to produce a Masterplan for significantly improved passenger facilities at Reading West Station, including accessibility improvements, provision of a station building on the Oxford Road and associated interchange enhancements such as increased cycle parking; improvements within the station itself, and improvements to the entrance from Tilehurst Road including provision of a gateline and ticket machines. Network Rail is due to implement Phase 1 as part of their wider programme of works for electrification of the line between Southcote Junction and Newbury. The second phase is currently unfunded.

4.47.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• TR2(i) No policy - REJECTED

This approach would fail to identify the necessary transport projects. In some cases, this could result in the loss of land which should have been safeguarded for key infrastructure to support growth. In other cases, it could mean lost opportunities for development to contribute in some way towards the delivery of that infrastructure, for instance through provision of land or supporting facilities, or alignment of development. Impacts on infrastructure provision puts the sustainability of growth in doubt.

• TR2(ii) Priority given to identified projects - PROPOSED OPTION

This approach would identify the main transport projects that are key to serving the existing town and supporting proposed growth. This would include all major transport schemes in LTP3 that have not already been delivered, as well as any schemes that have been put together more recently. In some cases, proposals will be at a stage where their extent can be shown on the Proposals Map, whilst other projects are at an earlier stage, and are better served by indication on a general map.

4.48 Access, Traffic and Highway-Related Matters (TR3)

4.48.1 *Key Considerations*

- National policy in the NPPF in paragraph 35 states that developments should "accommodate the efficient delivery of goods and supplies" and "create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians".
- The Council has produced Geometric Design Guidance for Residential Accesses on to Classified Roads and Commercial Accesses onto Adopted Roads (Version 2, 2011). This document is intended for developers and their advisers to help achieve high standards of highway design, so as not to compromise highway safety. One of the key principles is that there should not be new accesses onto classified roads where access is available from a non-classified road. This guidance is regularly referred to through the development management process.
- The Council has also designated a classified road network within the Borough, which includes 'C' roads in addition to the existing 'A' and 'B' roads.

• An existing policy in the Sites and Detailed Policies Document (PP006) (DM12) deals with access, traffic and highway related matters, and this has been an effective tool in securing safe and convenient access to new developments.

4.48.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• TR3(i) No policy - REJECTED

Under this approach there would be no specific detailed policy, which would mean relying on broader transport policies within the Local Plan, at the national level, and local transport policy on accesses. Without a specific policy the effect of schemes on safety, congestion and the environment would not be addressed in detail.

• TR3(ii) Continue current policy (SDPD DM12) - PROPOSED OPTION Continuing the existing policy approach will ensure that the safety and functioning of the highway will be considered at planning application stage. The broad existing approach continues to be appropriate, although there is a need for some updating of references, and can be carried forward into the Local Plan.

4.49 Cycle Routes and Facilities (TR4)

4.49.1 *Key Considerations*

- Cycling is one of the key sustainable modes of travel that the NPPF looks to promote. The core planning principles in paragraph 17 include making the fullest possible use of cycling, and paragraph 35 states that developments should give priority to pedestrian and cycle movements.
- LTP3 (OP005) highlights cycling as key mode of travel and an essential element of the transport system. It identifies a 20% increase in cycling between 2006 and 2011, and sets out the need to achieve a safe, attractive and direct network of cycle routes. As well as reducing carbon emissions, promotion of cycling also helps to ease congestion, improve air quality and promote healthy and active lifestyles.
- The Council produced a Cycling Strategy in 2014 (OP006), to supplement the more high-level strategy in LTP3. This identifies multiple benefits of cycling, including cutting carbon emissions and congestion, promoting healthy and active lifestyles and boosting economic growth as a result of evidence that more cycling to work can result in fewer sick days and improving journey times. The Strategy recognises room for improvement in terms of the proportion of people who cycle to work (2.8% at the 2011 Census) and aims to increase this to 6%. The Cycling Strategy will be achieved by:
 - new and improved cycle infrastructure that will aim to bridge gaps between existing barriers, including the railway and River Thames;
 - cycle hire will give people that do not currently have access to a bicycle the opportunity to cycle to key destinations;
 - increased cycle parking facilities to enable to people to park closer to more key destinations; and
 - positively promoting the benefits of cycling in a compact urban area.

Some of these schemes have already been delivered in part, including cycle hire in much of Reading, and new crossings of the Thames and railway.

- Connected to the Cycling Strategy is a network of colour-coded cycle routes, information on which is on the Council's website⁴³ and is periodically updated.
- A policy on cycle routes is set out in the Sites and Detailed Policies Document (PP006) (SA14). This largely identifies the cycle network as set out in a previous version of the Cycling Strategy.

4.49.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• TR4(i) No policy - REJECTED

This option would fail to give any priority to cycling. Although cycling would still be within the sustainable transport modes that fall under policy TR1, the details of the routes and facilities would not be set out, and would result in opportunities for enhancement being lost, and, potentially, a detrimental effect on existing facilities.

• TR4(ii) No loss of existing routes and facilities - REJECTED

Whilst this option would ensure that the existing routes and facilities would be retained, it is clear that the full potential for cycling to act as a means to reduce congestion and carbon emissions and improve health and air quality would not be seized. This would not achieve the rebalancing in favour of sustainable modes that the NPPF seeks.

TR4(iii) Development should enhance and extend routes and facilities – PROPOSED OPTION

This option would take a positive and proactive approach to the opportunities to enhance the network and range of facilities for cyclists. This would tie in with the approach of the LTP and the Cycling Strategy, and it is important that a policy should be linked to the most up-to-date Cycling Strategy as there would be likely to be changes within the plan period. Showing the cycle routes on the Proposals Map will make clear where there are particular opportunities for enhancements. This will also help to achieve the move towards sustainable transport modes set out in the NPPF.

4.50 Car and Cycle Parking and Electric Vehicle Charging (TR5)

4.50.1 Key Considerations

- The NPPF states that, where a plan sets parking standards for vehicles, the following points should be taken into consideration:
 - "the accessibility of the development;
 - the type, mix and use of development;
 - the availability of and opportunities for public transport;
 - local car ownership levels; and
 - an overall need to reduce the use of high-emission vehicles" (paragraph 39).

⁴³ <u>http://www.reading.gov.uk/cycling</u>

 National policy also supports the transition to low-emission vehicles, by requiring development "to be located and designed where practicable to incorporate facilities for charging plug-in and other ultra-low emission vehicles" (paragraph 35). This is also supported by the Council's LTP3 (OP005), which includes the following as an area-wide opportunity for addressing challenges:

"To work collaboratively with key partners to support and incentivise the use of electric vehicles, including a network of electric vehicle charging points, to improve air quality, reduce noise and carbon emissions and manage scarce resources."

- The Council's current approach to provision of car and cycle parking is to include a general policy statement CS24 in the Core Strategy (PP004) which is then supplemented by a much more detailed Parking Standards and Design Supplementary Planning Document (PP011). The most recent version of the SPD was adopted in October 2011, and it sets parking standards based on zones of accessibility, particularly by public transport. The lowest standards of parking are within the town centre, where, for some forms of development, no parking is expected. Parking provision increases in less accessible areas. Cycle parking standards apply across all zones.
- The Council does not currently require any charging points for ultra lowemission vehicles (ULEVs). However, with the focus on the need to address air quality in particular (see section 4.24), promotion of such vehicle use must form an element of the Council's response. It is generally considered that the main barrier to greater take-up of ULEVs is the lack of supporting infrastructure. According to ZapMap⁴⁴ there are currently only 11 locations with public charging points in Reading, all of which are in the centre or south. There is clearly a need for this infrastructure to expand substantially so that ULEVs can fulfil their potential.
- A number of other local authorities require provision of charging points, as follows:
 - London 1 in 5 parking spaces are required to provide a point;
 - Brighton and Hove for residential and office schemes with 10 or more spaces, 10% of parking spaces should provide a point;
 - Milton Keynes for non-residential development, there will be one point for 21-50 spaces, 2 points for 50-100 spaces and thereafter one per 100;
 - Watford for houses with dedicated parking, all homes should provide a point, and on all other development one point for 20-50 spaces, 2 points for 50-100 spaces and thereafter one per 50;
 - Scarborough one point per single house with off-street parking, and for over 100 spaces of non-residential parking, 2% of all spaces should have a point;
 - Woking one point per single house with off-street parking, and, for 20 spaces or more, 5% with active points and 10-15% with passive points.

There are therefore a number of approaches, but generally, of those authorities that do have adopted requirements, a number require points for every house with off-street parking, which is a relatively simple solution to deliver when it is built in from the outset. For other developments, a critical

⁴⁴ https://www.zap-map.com/live/

mass of parking is usually required before a proportion of charging points are required.

4.50.2 *Policy Options*

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• TR5(i) No policy - REJECTED

This approach would result in no policy on how much parking is to be provided, as without a policy there would be nothing to hang the more detailed SPD on. It would lead to inappropriate levels of parking being provided, too much in some locations where parking should be restricted, and too little elsewhere leading to on-street parking and potential highway safety issues.

 TR5(ii) Existing SPD policy-maximum standards applied depending on proximity to sustainable modes - REJECTED This option would simply carry forward the existing approach, where an SPD sets parking standards linked to accessibility levels. This would be generally appropriate for car parking, but it would fail to address the issue posed by poor air quality in Reading and would fail to provide the necessary infrastructure for improved take up of low emissions vehicles.

 TR5(ii) Existing SPD policy with additional requirement for electric vehicle charging - PROPOSED OPTION This option would carry forward the existing approach of the SPD setting out parking standards linked to accessibility levels. This is appropriate, as the level of detail required is more appropriate in an SPD, which can also respond more flexibly to any changes in accessibility levels during the plan period. The current SPD should work alongside any new policy.

In terms of the need for charging points, as has already been set out in the section on air quality, there is a need for a comprehensive approach to address this issue in Reading, and improving the infrastructure for low emissions vehicles is a logical part of that. As required by other authorities, a charging point for every house with off-street parking is an easy win that can be simply designed in from the outset. For developments with communal parking, it has been decided that the situation warrants an ambitious approach, with 10% of spaces offering charging points on developments with ten or more spaces, which matches that required by Brighton and Hove.

4.51 Network and Hierarchy of Centres (RL1)

4.51.1 Key Considerations

- The NPPF sets out to protect and promote existing town centres, and states that plans should plan for the management and growth of centres. Local Plans should "recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;" and "define a network and hierarchy of centres that is resilient to anticipated future economic changes" (paragraph 23).
- The Western Berkshire Retail and Leisure Study (2017; EV020) considered a study area comprising all of Berkshire along with and area extending to High Wycombe, Didcot, Basingstoke, Camberley and Farnborough. Within this area,

Reading was by some distance the dominant centre, attracting 18% of all comparison goods spend generated in the area. It clearly fulfils a regional role, and, in Experian's 2017 ranking of centres best placed to survive, it was ranked 8^{th} in the UK⁴⁵.

- The Oracle, which opened in 1999 established Reading as one of the UK's top retail destinations, with a dominant role in the Thames Valley. More recent improvements in nearby town centres such as Basingstoke and High Wycombe have reduced Reading's reach into areas close to those centres, but the centre remains strong, with an emphasis on national multiple retailers.
- In addition to the town centre, there are a number of smaller groupings of shops and services, ranging from larger district centres with a wide range of facilities, through to very small parades of a handful of shops.
- Figure 4.26 summarises some of the key facilities available in each centre, and demonstrates that some centres have a considerably wider range of services. Of the smaller centres, Caversham and Tilehurst Triangle have the widest range, followed by Oxford Road West and Whitley. The smallest centres, such as Whitley Wood, Dee Park, Basingstoke Road North and Northumberland Avenue North have very few of the different types of facilities.

	Total shop units	Total A class f/s sq m (approx)	GP Surgery	Dentist	Pharmacy	Library	Youth and/or Community Centre		Bank	Post Office	Public House		Large supermarket	Over 1,000 sq m of retail
Reading Centre		figure	✓	✓	\checkmark	~		✓	✓	✓	✓	✓	✓	\checkmark
Basingstoke Road North	19	1,400			\checkmark									
Caversham	118	14,200	✓	✓	\checkmark	\checkmark			✓	\checkmark	\checkmark	\checkmark	✓	✓
Cemetery Junction	55	5,500	✓		\checkmark		\checkmark			✓	\checkmark	✓		✓
Christchurch Road	15	1,500	\checkmark		\checkmark				✓		✓			
Coronation Square	11	1,000			✓	~	✓			\checkmark				
Dee Park	3	200						✓						
Emmer Green	17	2,600			\checkmark					✓	\checkmark	✓		✓
Erleigh Road	13	900	\checkmark	\checkmark	\checkmark						\checkmark			
The Meadway	31	6,900		\checkmark	\checkmark								\checkmark	\checkmark
Northumberland Avenue North	9	1,500												
Oxford Road West	160	24,800	✓		\checkmark	~		✓		\checkmark	\checkmark	✓	✓	\checkmark
Shinfield Road	21	2,700		\checkmark	\checkmark					\checkmark	\checkmark			\checkmark
Tilehurst Triangle	59	6,900	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark		\checkmark	\checkmark
Wensley Road	5	350	\checkmark		\checkmark		\checkmark	\checkmark		\checkmark				
Whitley	29	11,500		\checkmark	\checkmark	~	\checkmark			\checkmark	\checkmark	\checkmark	✓	\checkmark
Whitley Street	6	3,300	\checkmark	1	\checkmark					\checkmark	\checkmark			\checkmark
Whitley Wood	37	1,100			\checkmark									
Wokingham Road	53	3,700	\checkmark		\checkmark			\checkmark			\checkmark			\checkmark

Figure	4 26.	Services	and	facilities	available	in	defined	centres
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• Existing policy CS26 in the Core Strategy (PP004) establishes a network and hierarchy of centres, and policy SA15 of the Sites and Detailed Policies Document (PP006) defines their boundaries. This hierarchy still broadly reflects the current situation. The significant changes carried out since those documents were put in place are at Dee Park, where the existing centre was demolished and new facilities constructed as part of the ongoing regeneration,

⁴⁵ http://www.experian.co.uk/marketing-services/news-retailscape-uk-retail-centres-best-placed-to-thrive.html

and Whitley, where a development featuring a new supermarket, pub and gym has been completed.

- There are some locations where there is a clear need for change and development to occur. The ongoing development at Dee Park is underway, and there will be changes to the location and provision of services. The regeneration of the Meadway Precinct site has been a Council aspiration for some time, and a Meadway Centre Planning Brief was adopted in 2013. Finally, the Local Plan identifies a major development opportunity adjacent to Whitley district centre, with scope to extend the district centre.
- The boundaries of the centres, as defined in the existing SDPD and as shown on the Proposals Map (PP007), are generally drawn to include nearby facilities and any clear opportunities for expansion where they exist. There is a need to make some minor alterations to these boundaries to reflect some recent changes, in particular in Dee Park, where the location of the facilities have changed.

4.51.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• RL1(i) No policy - REJECTED

This option would fail to set out a network and hierarchy of centres as required by the NPPF. It would therefore also fail to direct proposals for main town centre uses to the existing centres, and would make it very difficult to apply the sequential test as set out in the NPPF.

• RL1(ii) Retain current boundaries - REJECTED

This option would use the same network and hierarchy as the proposed option (see below) but would use the same centre boundaries as in the Sites and Detailed Policies Document. This would fail to properly reflect recent changes.

 RL1(iii) Existing hierarchy with amended boundaries as proposed – PROPOSED OPTION

The proposed policy option involves carrying forward the existing hierarchy as set out in the Core Strategy. There have not been changes since the Core Strategy was produced that have altered the overall hierarchy. As at Core Strategy stage, it is important to set designations that do not merely reflect the existing situation, but allow centres to grow into their role through the inclusion of additional facilities where possible. So, for example, whilst centres such as Caversham and Tilehurst Triangle are clearly already at district centre level, it is appropriate that other centres such as Emmer Green, which is some distance from any other designated centres, have a status which allows them to adequately serve their catchment.

There should also be changes to the existing centre boundaries to reflect changes that have happened in recent years, for instance addition of new facilities or loss of existing facilities, or, in the case of Dee Park, to shift the entire centre.

4.52 Scale and Location of Retail, Leisure and Culture Development (RL2)

4.52.1 Key Considerations

- National policy in the NPPF puts a strong emphasis on delivering needs for economic development. Paragraph 156 specifies that Local Plans should include strategic policies to deliver "the provision of retail, leisure and other commercial development".
- The NPPF also includes strong support for the role of town centres. According to paragraph 23:

"Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should:"

- recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;
- define a network and hierarchy of centres that is resilient to anticipated future economic changes;
- allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability."
- The Council worked with its neighbours within the Western HMA (Bracknell Forest Borough Council, Wokingham Borough Council and West Berkshire District Council) in commissioning a Western Berkshire Retail and Commercial Leisure Assessment from GVA, which reported in 2017 (EV020). This looked at the quantitative and qualitative needs for additional retail and commercial leisure within the area up to 2036.
- In terms of retail, for Reading the assessment found the following levels of quantitative floorspace need (all figures are sq m):

(source: Western Berkshire Retail and Commercial Leisure Assessment 2017)							
	To 2021 To 2026 To 2031 To 2036						
Comparison	2,300	17,700	35,300	54,400			
Convenience	-20,600	-20,100	-19,800	-19,500			
Total	-18,300	-2,400	15,500	34,900			

Table 4.27: Retail floorspace needs in Reading Borough

In general, the assessment found an initially small net positive need for comparison retail, which increases substantially over the plan period. It also found a considerable oversupply in convenience floorspace across the plan period, with some large superstores trading below benchmark levels. The last two columns are italicised in recognition of the considerable uncertainty in forecasting this far into the future. The assessment states in paragraph 1.3 that "we advise that all findings and recommendations covering the second half of this period (i.e. beyond 2026) are considered indicative and should be further reviewed through the Councils' respective Local Plan periods".

Whilst the separation of comparison and convenience floorspace is required for methodological reasons, in practice there is some overlap, and, unless goods

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restrictions are applied by condition, which is not usually the case in town centres, there are no planning controls on changes between convenience and comparison. It is therefore considered that the Local Plan should focus on the overall total, as the shops themselves have flexibility to sell both convenience and comparison goods.

It is therefore considered appropriate for the Council to plan for a total retail figure, and given GVA's consistent advice that longer term figures are indicative and it is in the longer term that Reading's needs increase substantially, it is further considered appropriate to treat this as a maximum. The Local Plan should therefore treat the need as being **up to 34,900 sq m** of additional retail floorspace.

- In terms of commercial leisure, the assessment largely came to the conclusion that the highest order centres, including Reading, are relatively well provided for. Specific qualitative gaps in Reading were for an entertainment venue (ice skating/bowling) and for additional cinema facilities (ideally independent/arts-focussed). However, there are plans to provide an ice rink adjacent to the Madejski Stadium as part of the Royal Elm Park proposals, which were permitted subject to the signing of a Section 106 agreement in April 2017 (reference 160199). Meanwhile, the permission at St Martin's Precinct in Caversham (ref 140997) includes the provision of leisure floorspace, which is restricted by planning condition to cinema use. Therefore, existing proposals cover these qualitative needs to a degree.
- It is worth noting at this point that the Council's experience recently has been that quantitative retail needs are not necessarily tied to reality on the ground. A Retail and Leisure Study in 2005 to support the Core Strategy found a need for almost 100,000 sq m of retail over that period (to 2026). Despite making allocations in and adjoining the primary shopping area in the Reading Central Area Action Plan that could accommodate the retail need, and despite many of those sites coming forward for development, there was very little market interest in providing substantial retail expansion in Reading over the last ten years, and some permissions such as Station Hill actually involve a loss of retail floorspace. Expansion in online retailing is likely to have played a major role in this. For this reason, the Council treats quantitative need assessments with a degree of caution, and this is another reason it is inclined to treat the emerging figures as maxima.
- The Housing and Economic Land Availability Assessment (EV014 and EV015) examined the capacity of potential development sites to accommodate the retail and leisure need, and identified potential for a net gain of 5,192 sq m of retail and 15,034 sq m of leisure by 2036. On the face of it, this would therefore lead to an undersupply of almost 30,000 sq m of retail by 2036.
- However, it is worth noting that a key part of the HELAA is to consider likely deliverable levels of development potential and then to further consider availability and achievability. The Council's past experience of a lack of market interest in providing substantial retail together with past developer discussions on specific sites has therefore played into the way that the HELAA has been carried out, and, as a result, the figures do not always represent the full physical capacity of the sites to provide retail floorspace should market interest back up GVA's quantitative conclusions.

With this in mind, it is possible to examine the potential for some of the key retail sites to provide retail floorspace over and above the level identified by the HELAA. Three allocated redevelopment sites in particular in or adjoining

the Primary Shopping Area and which already specify retail use on the ground floor in the policy can be re-examined, namely CR11e: North of the Station, CR12d: Hosier Street and CR11d: Brunel Arcade and Apex Plaza. The HELAA assumes, based on past difficulties in securing retail, that only part of the around floor of these sites would be used for retail purposes. The second column of table 4.28 looks at what would happen if the assumptions were that the whole of the ground floor were in retail use, and it can be seen that this would result in an additional 14,800 sq m of retail. If an increased plot ratio of 60%, more in common with existing town centre shopping streets, were to be used instead, the additional floorspace could be up to 23,700 sq m. This could mean that the total retail floorspace gain provided purely on sites already planned for retail has the flexibility to increase to almost 30,000 sq m, the vast majority of the identified need.

	Existing net	Uplift using	Uplift using
	retail gain	existing plot	increasing plot
	(HELAA/LP)	ratio assumptions	ratios
North of Station	1,800 sq m ⁴⁶	+ 7,700 sq m	+ 14,300 sq m
Hosier Street	4,900 sq m	+ 1,000 sq m	+ 3,300 sq m
Brunel Arcade & Apex Plaza ⁴⁷	1,900 sq m	+ 6,100 sq m	+ 6,100 ⁴⁸ sq m
TOTAL	8,600 sq m	+ 14,800 sq m	+ 23,700 sq m

Furthermore, with different models of retail provision (for instance multi-level retail development, none of which is assumed above), retail capacity could increase still further.

Changing assumptions about ground floor use would of course result in a corresponding loss of 14,800 sq m of other uses, but this is most likely to affect office uses where the Local Plan already provides for an over-supply against needs.

It should also be noted that the representation on the Pre-Submission Draft Local Plan from Hammerson plc (see LP007), the owners of the Oracle, make reference to potential expansions of the Oracle to accommodate up to an additional 5,500 sq m of retail or town centre use over and above the proposed policy. This potential is more difficult for officers to assess without seeing specific proposals, as the Oracle is a complicated site with various levels and nearby sensitivities, and this would involve expansion rather than wholesale redevelopment. Any proposals would need to be assessed on their merits, as is the case for any of the sites in table 4.28 above. However it further underlines the point about potential flexibility.

It is recognised that the figures above are by no means precise, and there is clearly a high degree of sensitivity to differing assumptions. Nevertheless, it is illustrative of a wider point - that there is capacity within existing identified sites in central Reading to substantially increase retail floorspace should that be supported by the market, and that there is not therefore any need to seek to meet the identified needs in other authorities.

 ⁴⁶ The proposed net gain is small because there is a substantial amount of retail warehousing on the site already
 ⁴⁷ Increases on this site would involve retail development adjacent to, but not within, the Primary Shopping Area.

⁴⁸ A high plot ratio is already assumed in the HELAA, hence why the figure is the same in both columns.

4.52.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• RL2(i) No policy - REJECTED

This approach would fail to provide the strategic policy direction in terms of the amount of retail floorspace to be provided, and would give no spatial direction to where development would be provided. As such, development would take place in an unplanned, haphazard way.

- RL2(ii) Plan for 34,900 sq. m retail and related facilities with new leisure facilities, direct to town centre in the first instance PROPOSED OPTION This approach plans for the level of need for retail and leisure development outlined in the Retail and Commercial Leisure Assessment. As set out above, it would treat the quantitative need for retail as a maximum, and would consider comparison and convenience need together. It directs major retail and leisure need towards central Reading. Although the existing capacity on identified sites in the HELAA and allocated in the Local Plan would not provide for this full need, there is scope to substantially increase this capacity on identified sites within the strategy set out in RL2 should market conditions support the conclusions of the Retail and Commercial Leisure Assessment.
- RL2(iii) Plan for more development, allow more development outside of the town centre REJECTED

This would be an aspirational approach, planning for significant growth in Reading, over and above what can be supported on the basis of existing evidence. This would be likely to draw from the capacity identified for surrounding areas, and would potentially threaten the ability of centres such as Wokingham to fulfil regeneration aspirations. As there is limited capacity in the centre to provide more than the identified need (see above), this may well mean a need to plan for more development on edge of centre or out of centre sites. This would lead to additional car trips, and, potentially, end up with a detrimental impact on the centre of Reading.

 RL2(iv) Plan for less development, direct to town centre in first instance -REJECTED

The Local Plan approach is to plan for up to 34,900 sq m, so this would include potential for provision below this level by the end of the plan period. This approach is therefore taken to mean planning for substantially below the level of identified need. This would not comply with national policy in the NPPF and would potentially mean needing to meet retail needs outside the Borough boundaries.

4.53 Vitality and Viability of Smaller Centres (RL3)

4.53.1 *Key Considerations*

• National policy states that, in drawing up Local Plans, local authorities should:

"define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations" (paragraph 23)

- In addition, Local Plans should "promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres" (paragraph 23).
- The existing policy CS27 on the Sites and Detailed Policies Document (PP006) seeks to manage changes of use within smaller centres. It does this to try to retain the core retail purpose of the centre, and also to manage accumulations of takeaways. There are concerns around the amenity effects of a concentration of takeaways, such as noise and disturbance in the evening and litter, especially since policy is encouraging a residential presence within smaller centres. The policy is based on length of key frontage, as defined on the Proposals Map. Length of frontage can be measured fairly simply, and is more meaningful than number of units, particularly where where there are single, very large retail units (e.g. a superstore) in a centre. Floorspace, although arguably the most meaningful of the possible approaches, is very difficult to get an up-to-date figure for, and it would therefore be almost impossible to apply in practice.
- Recent changes to national planning law have meant a need to review how the policy operates in terms of A2 financial and professional uses. Changes from A2 to A1 retail did not require planning permission when the SDPD policy was introduced, but more recently the need for planning permission for a change in the other direction has been removed. In effect, A1 and A2 therefore operate as a single use class, and a policy based solely on A1 would be impossible to fully implement. A review is therefore required.
- The proportions of the existing defined key frontage in A1/A2 use and A5 use are set out in table 4.29 below.

Centre % of % of % of Last surveyed							
Centre	% of			Last surveyed			
	frontage	frontage	frontage				
	A1	A1/A2	A5				
Basingstoke Road	51.4	51.4	14.9	June 2017			
North							
Caversham	49.3	65.0	2.6	June 2017			
Cemetery Junction	60.1	65.8	9.8	June 2017			
Christchurch Road	49.5	72.0	13.6	June 2017			
Coronation Square	63.2	63.2	18.5	June 2017			
Emmer Green	50.7	50.7	25.0	June 2017			
Erleigh Road	48.3	58.6	15.1	June 2017			
The Meadway	57.4	57.4	11.7	July 2013			
Northumberland	69.1	69.1	24.1	June 2017			
Avenue North							
Oxford Road West	58.2	63.4	11.6	June 2017			
Shinfield Road	49.9	49.9	23.3	June 2017			
Tilehurst Triangle	53.9	75.3	9.1	September 2016			
Wensley Road	80.7	80.7	19.3	June 2017			
Whitley	55.5	73.6	17.8	June 2017			
Whitley Street	36.6	38.7	17.8	June 2017			
Whitley Wood	67.3	67.3	9.1	June 2017			
Wokingham Road	55.4	59.5	14.5	January 2018			

Table 4.29: Proportions of A1 and A5 in key frontages

• The approach of the existing policy is to set the proportion of A1 floorspace at a level just below existing levels, unless there are reasons for particular concern, in particular the low level of A1.

4.53.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• RL3(i) No policy - REJECTED

This approach would mean no attempt to manage changes of use within the ground floor of district and local centres, and could mean wholesale changes to the character of specific centres that put their place in the hierarchy of centres at risk. In extreme cases, it could mean the loss of whole centres to uses such as residential at the ground floor, as has happened in other parts of the country.

• RL3(ii) Different approaches for different centres - PROPOSED OPTION This option would be centred around maintaining a proportion of A1/A2 use in each centre that takes into account the existing proportion within each key frontage. In order to do this, key frontages need to be identified on the Proposals Map. Given the fact that centre boundaries have been drawn to include facilities such as schools and community centres, this will not be likely to include the entire frontage of each centre. In each case, the frontage should include the most significant cluster of retail uses within each centre, based on previous surveys and local knowledge.

This approach would also look to limit takeaways. It is considered that 30% is an appropriate overall maximum proportion - Whitley Street has previously breached this proportion (although is currently below it), and it was at this point that the effects of the concentration of takeaways became particularly apparent. There would also need to be means to prevent several takeaways being located adjoining one another in a certain part of the centre.

Given the increasing emphasis on the variety and diversity of uses within centres, one of the most important jobs of the policy is to maintain and enhance the overall level of 'centre uses' in each centre. Such uses should be widely defined as being those that ground floor uses that add vitality and viability to centres, i.e. those that attract visiting members of the public. Their loss to non-centre uses should be resisted, as this would clearly affect the performance of the centre. In addition, where a development would offer an opportunity to expand the range of centre uses, it is important that this opportunity is taken. As set out in the previous section, such opportunities arise rarely.

- RL3(iii) Less restrictive approach (40% A1/A2 for all centres) REJECTED This approach would set the bar too low in terms of the proportion of A1/A2 uses that should be within the key frontages. Only one centre in Reading is currently operating at below the 40% threshold, and only marginally. This policy could leave the way clear to a substantial reduction in the retail function of the district and local centres across Reading, meaning a need to travel further, often by car, for day-to-day shopping needs.
- RL3(iv) More restrictive approach (60% A1/A2 for all centres) REJECTED The main reason that this approach was rejected is that it was not considered sufficiently flexible. Many centres are already operating below the 60% threshold without substantial concerns for their health, such as Wokingham

Road and Emmer Green. Centres vary considerably in character, and the onesize-fits-all approach is not appropriate.

4.54 Betting Shops and Payday Loan Companies (RL4)

4.54.1 Key Considerations

- Recent changes to the Use Classes Order removed betting shops and payday loan companies from the A2 use class and designated them as sui generis uses, in their own use class. As such, they now fall within planning control.
- Whilst it is recognised that a single betting shop or payday loan company can make a contribution to the range of facilities within a centre, a proliferation of such uses can exacerbate existing economic problems in local areas, as well as having a detrimental effect on the appearance and character of the area, particularly where the shopfronts are obscured.
- The location of existing betting shops and payday loan companies is shown on Figure 4.30. This map also seeks to highlight areas where there are existing clusters, or the potential for clusters to form, by indicating those areas within 150 metres of at least two such units. The affected areas are part of central Reading around Friar Street, and areas on Oxford Road, Whitley Street and Tilehurst Triangle.

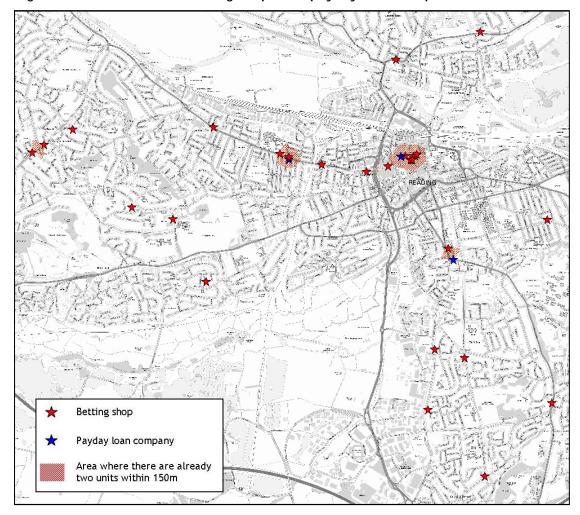


Figure 4.30: Location of betting shops and payday loan companies

4.54.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

RL4(i) No policy - REJECTED

This option would allow continued proliferation of betting shops and payday loan companies, which would lead to harm to visual amenity, exacerbate existing economic problems, reduce diversity in the centre and potentially lead to reduced footfall in some areas.

• RL4(ii) Use a 150m radius of existing shops - PROPOSED OPTION

This option would seek to avoid the emergence of clusters of betting shops and payday loan companies. It is considered that three units within 150m of one location would represent an unacceptable cluster. To some extent, this is a matter of judgement, but as shown on Figure 4.30, the use of this approach picks up on the main areas of concern without being unreasonably restrictive on the establishment of new uses.

• RL4(iii) Less restrictive (50m radius) - REJECTED

This option, with the same approach as the proposed approach but using a 50m buffer rather than 150m, would not be effective, as it could easily lead to a proliferation of uses in close proximity. 50 metres is very little distance in the context of a shopping street, and could result in six or seven such units even within a local centre such as Wokingham Road.

4.55 Impact of Main Town Centre Uses (RL5)

4.55.1 *Key Considerations*

- The NPPF states that any application for a main town centre use not within a centre and not in accordance with an up-to-date development plan strategy should be accompanied by an assessment of impact on existing centres if over 2,500 sq m, or if over any other proportionate, locally-set threshold.
- In order to set a proportionate threshold, it makes sense to consider the scale of development where an impact on existing, designated centres is likely. To some extent, any size threshold is somewhat arbitrary, and impact will also depend on other factors such as location, accessibility and type of development. However, since the NPPF expresses thresholds in terms of size, the best basis for considering which size of developments are likely to have a negative effect is to look at the sizes of the existing centres. Table 4.26 lists each centre and provides a total floorspace figure for 'A'-class uses. With the exception of Dee Road, in the process of delivery, the smallest centre (Wensley Road) has only 350 sq m of 'A'-class floorspace. However, this is the exception, and the remainder of the smaller local centres have approximately 1,000 to 1,500 sq m of 'A'-class floorspace. Since a development of a similar size to an existing centre would be likely to have a detrimental impact on it, where it is in a competing location, 1,000 sq m is considered to be the most appropriate threshold.

4.55.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• RL5(i) No policy - REJECTED

This option would mean reliance on the 2,500 sq m threshold in the NPPF. However, this would mean that a development providing more retail floorspace than many of Reading's existing centres could take place without any assessment of impacts, and could lead to significant detrimental impacts on existing centres.

- RL5(ii) Policy containing 1000 sq. m threshold PROPOSED OPTION
 This option would trigger an impact assessment where at least 1,000 sq m of
 retail floorspace would be proposed in an out of centre location. This is
 considered a reasonable approach, as this level of development would be
 significant in relation to the level of retail and related floorspace in the
 smaller existing centres.
- RL5(iii) Policy containing 100 sq. m threshold PROPOSED OPTION This option would result in a great deal more applications having to assess the impact on existing centres. However, this is not considered to be proportionate, as shops of this scale are very much local in nature.

4.56 Protection of Leisure Facilities and Public Houses (RL6)

4.56.1 *Key Considerations*

- Paragraph 70 of the NPPF states that local plans should "guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs"
- In addition, the NPPF specifically protects existing sports and recreational buildings and land. It states that these should not be lost unless:
 - "an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss" (paragraph 74).
- Since the facilities grouped together under the 'leisure' banner are so diverse, there are three very different reasons why they are of such importance to the quality of life of the population of Reading:
 - Facilities involving physical activity and informal recreation contribute towards the physical health of the population;
 - Facilities involving arts and cultural activity contribute towards the mental well-being of the area; and
 - Certain uses, such as public houses, can serve as a focus for their communities.

All three reasons are important. It is clearly preferable to retain these facilities where it can be achieved and where it is appropriate.

- The following lists the pubs that have been lost to development or change of use requiring planning permission in the ten years 2007-2017. The list does not include closures of pubs or changes of use not requiring permission, generally to A1, such as occurred at the Merry Maidens on Shinfield Road.
 - Bird in Hand, Lower Armour Road

- Brewery Tap, Castle Street
- County Arms, Watlington Street
- Frog, Dee Park
- Golden Key, Queens Road, Caversham
- Happy Prospect, Coronation Square
- Honeypot, Friar Street
- Kennet Arms, Pell Street
- Oasis, Baker Street
- Queen Elizabeth, George Street
- Roundhead, Wensley Road
- Whitley Tavern, Northumberland Avenue
- Woodley Arms, Waldeck Street (permission to convert not commenced)
- The following lists the other leisure uses that have been lost to development or change of use requiring planning permission in the ten years 2007-2017. Once again, the list does not include closures or changes of use not requiring permission.
 - Colours Pool Hall, Cremyll Road
 - Fez Nightclub, Gun Street
 - Gym, Hodsoll Road
 - Matrix Nightclub, London Street
 - Mecca Bingo, Station Hill
 - Rifle Club, Jefferson Close, Emmer Green
 - Rileys Pool Hall, Oxford Road
 - ROAB Leisure Club, Kings Road
 - Swimming Pool, Admirals Court
- There is clearly a trend of a loss of public houses, particularly in suburban areas of Reading where there are particular deprivation issues. Whilst there have been some new developments, the overall trend has been one of loss, totalling 2,479 sq m, as can be seen in table 2.6. There has been much less significant loss of other leisure facilities, and table 2.6 shows an overall gain in floorspace of 16,270 sq m. In general, the loss of leisure has been outweighed by gains elsewhere, although this does not necessarily apply to the specific types of uses. It can be seen that, mirroring the loss of pubs, the losses have often been in the types of uses associated with the evening drinking economy, such as nightclubs and pool halls.
- The individual losses of leisure and pubs are not necessarily inappropriate. However, it clearly indicates that there is a need for a policy to be in place to consider proposals and determine whether these losses would unacceptably reduce the facilities available.
- In January 2018, the list of Assets of Community Value included 11 public houses, and four other leisure facilities, including the Madejski Stadium, Arthur Hill pool and Kings Meadow Baths. This clearly indicates the importance which the community attaches to these facilities.
- The existing approach is set out in DM15 of the Sites and Detailed Policies Document (PP006) and, for the town centre, RC7 of the Reading Central Area Action Plan (PP005). Broadly, the existing policy approach has a different approach within smaller centres, where there is a strong presumption in favour of retention, and in other locations including the town centre, where there is more of a criteria-based approach.

4.56.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• RL6(i) No policy - REJECTED

This approach would mean that there is no explicit policy seeking to resist loss of public houses and leisure facilities. The significant risk would be that some uses, which are critical to their community or Reading as a whole, could be lost to higher value uses, which would impact on matters such as quality of life. The loss of public houses is already a noticeable trend in Reading, and elsewhere. Whilst the planning system cannot artificially keep unsustainable uses alive, it can seek to distinguish between those instances, and instances where a more valuable use is being sought. The Sustainability Appraisal highlights some of these issues, noting the negative effects on matters such as access to leisure, healthy lifestyles and community cohesion.

- RL6(ii) Strong protection of individual facilities PROPOSED OPTION This approach would set out a presumption in favour of retention of leisure facilities and public houses, and would give the criteria to consider those circumstances where release of a specific facility might be justified. The proposed approach is a change from the existing set of policies, in that there is less distinction between facilities within centres and outside than in previous policy, particularly because it would weaken the protection for sports facilities, which are often not in centres. It also changes the approach within central Reading, which was previously more relaxed about loss of leisure facilities. In part, this is to bring it into line with paragraph 74 of the NPPF.
- RL6(iii) Strong protection of overall amount of existing facilities REJECTED This approach would not concern itself with individual facilities, but would resist developments that would reduce the overall amount of leisure facilities. There are difficulties with this approach, in that it would not protect those uses that are critical to the vitality and viability of existing centres, and could theoretically allow a loss of such facilities as long as it was replaced elsewhere (even if the new location would be less accessible).

4.57 New and Existing Community Facilities (OU1)

4.57.1 Key Considerations

- The NPPF includes specific reference to provision of community facilities within its core planning principles, stating that planning should "deliver sufficient community and cultural facilities and services to meet local needs" (paragraph 17).
- This strong emphasis on adequate facilities exists throughout the NPPF, with paragraph 70 stating that policies and decisions should:
 - "plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
 - guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;

- ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and
- ensure an integrated approach to considering the location of housing, economic uses and community facilities and services."
- Paragraph 156 of the NPPF identifies "the provision of health, security, community and cultural infrastructure and other local facilities" as a strategic priority needing a strategic policy.
- Community facilities mean different things to different people. The following uses could all be said to be 'community facilities':
 - Health services, including hospitals and doctors and dentists surgeries
 - Education, including schools, pre-school facilities, higher, further and adult/community education, as well as training and skills centres
 - Youth and community centres and meeting places
 - Libraries
 - Places of worship
 - Civic and administrative facilities

A number of other types of use have the potential to be centrepieces of a community, such as open space, leisure uses or pubs, and these could therefore be regarded as community facilities. However, these uses are dealt with elsewhere, and are not therefore covered here.

• Table 2.6 of this paper has demonstrated that there has been a significant growth in the D1 use class (non-residential institutions, covering most types of facility set out above) of 51,976 in the last ten years.

<u>Education</u>

• The NPPF contains particular emphasis on the provision of schools, in line with the deregulation of the planning system to support schools in recent years. Paragraph 72 states that:

"The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- give great weight to the need to create, expand or alter schools; and
- work with schools promoters to identify and resolve key planning issues before applications are submitted."
- There are 49 local state-funded schools in Reading, scattered throughout the Borough. Most of these are primary schools. There are 39 schools at primary level (including infant and junior schools). This includes the recently-opened free schools of The Heights and the Civitas Academy, and the large residential development underway at Green Park will also provide a new primary school. The Heights is currently operating from a temporary site in Lower Caversham, and a planning application is under consideration for a permanent site at Mapledurham Playing Field.
- There are 10 state-funded secondary schools in the Borough, of which three (Maiden Erlegh in Reading, UTC Reading and the Wren School) are free schools that have opened within the last five years. The permanent buildings for the Wren School are still under construction.

- There are significant cross-boundary movements of pupils for education purposes, particularly for secondary schools. Pupils travel from Reading to secondary schools in Wokingham (e.g. Bulmershe and Maiden Erlegh), West Berkshire (e.g. Little Heath and Denefield) and Oxfordshire (e.g. Chiltern Edge). There are also cross-boundary movements in the other direction, with, for instance, the well-regarded selective grammar schools of Kendrick School and Reading School drawing pupils from a wide catchment.
- In terms of needs for school provision, the Infrastructure Delivery Plan (EV007) provides information on identified needs for additional or expanded facilities. Growth in housing and population continues to put pressure on education facilities, and, with limited potential for new sites for schools to be found, on-site expansion is an option that has been extensively used in the past and will continue to play a role. Therefore, any policy would need to be able to deal with issues created by this. A particular need for a new secondary school has been identified to address needs up to 2026, ideally located as close to the centre as possible, and site selection work is underway.
- The University of Reading has its main campus on the boundary with Wokingham District, and also has a significant campus on the London Road, as well as various other sites in both Reading and Wokingham Boroughs. The University is dealt with in more depth in section 4.90. Reading College, located on Kings Road, provides the main further education facility in Reading.
- In addition to these facilities, education and learning is offered at various other points, including libraries, youth and community centres and the museum.

<u>Health</u>

- In terms of hospitals, the Royal Berkshire NHS Foundation Trust provides hospital services to Reading and much of the surrounding area, principally through the Royal Berkshire Hospital on London Road/Craven Road. The Royal Berkshire Hospital is dealt with in more detail in section 4.91. There are also private hospitals in Reading, including the Circle Hospital, part of the recent development at Kennet Island.
- Doctors and dentist surgeries are dispersed across Reading, with around 30 GP's surgeries and 25 dental practices within the Borough boundaries. More are located just outside the boundaries, particularly in Tilehurst and Earley. There are two areas where dentist surgeries are particularly concentrated Whilst most areas have good access to both types of facility, there are some areas of Caversham, West Reading and Whitley with less access. Some of these areas are among the more deprived areas, so this may be an issue. Reading has a similar number of pharmacies, and these tend to be within existing centres or shopping parades.
- There are two Clinical Commissioning Groups covering the Borough the North and West Reading CCG and South Reading CCG. The Council has sought to engage with these groups in drawing up the Local Plan. The Infrastructure Delivery Plan again looks at need for primary healthcare facilities. The CCGs do not currently have a formal estates strategy, but the Council has offered to work jointly with the CCGs in developing such a strategy. The main current identified issue, apart from providing facilities to keep pace with population growth, is the need for some form of consolidated provision in South Reading.

Other facilities

- In terms of other facilities, there are seven libraries, generally located within existing centres across the Borough, as well as a mobile library, serving elderly and disabled people. In addition to books, CDs and DVDs, libraries offer a useful point of contact to access Council information. The eleven youth and community centres are evenly dispersed across Reading. Many of these are located in the more deprived areas, and they provide a valuable resource as a focus for a community and a location for events.
- There are numerous places of worship. Churches and chapels of a wide range of branches of Christianity are spread across Reading. In addition, Reading has a handful of mosques and Islamic centres, a synagogue and a Hindu temple. One of the planning issues Reading has faced in recent years is from churches using industrial units within protected employment areas, and this has in some cases resulted in enforcement action being taken.

4.57.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• OU1(i) No policy - REJECTED

This approach would fail to set out the strategic policy on these matters required by the NPPF. It would not address issues arising with the more intensive use of school sites, which has been a key planning consideration in recent years, would not support the provision of new education, in particular a new secondary school, and would not make the most of opportunities for colocation of facilities.

OU2(i) No policy - PROPOSED OPTION

There is a need for a strategic policy covering provision of new and retention of existing community facilities in Reading. Key issues that this should address include on-site intensification of school sites, the provision of a new secondary school on a site still to be identified, and the co-location of facilities. The policy can take elements of existing policy CS31 from the Core Strategy forward, but there need to be amendments to reflect the education issues above. In terms of further and higher education, there is also a need to take account of the student accommodation issues discussed in section 4.43, by incorporating the principle that development that would result in additional students should be capable of being supported by existing or planned levels of student accommodation.

4.58 Hazardous Installations (OU2)

4.58.1 Key Considerations

- European law in The Seveso III Directive (2012/18/EU) requires that objectives
 of preventing major accidents and limiting the consequences of such accidents
 are taken into account in land-use planning policies. These policies should
 consider three key scenarios:
 - Siting of new establishments,
 - Modifications to establishments; and
 - New developments within the vicinity of existing establishments and the increased risk of a major accident.

The Directive is implemented in the UK through the Control of Major Accident Hazard Regulations 2015 (COMAH).

- The NPPF (paragraph 172) states that policies should be based on up-to-date information on the location of major hazards and on the mitigation of the consequences of major accidents.
- The Civil Contingencies Act 2004 deals with the risk of an emergency occurring, and states that local authorities should assess the risk of this, and make plans to ensure that if an emergency occurs, the authority is able to continue to perform its functions.
- There are two COMAH sites within Reading at the time of writing. Their location is shown on Figure 4.31 below.
 - Oxkem Limited at 117 Loverock Road in West Reading is a lower tier establishment, and has consent for the storage of up to 200 tonnes of chromic acid flake:
 - The Gillette factory at 452 Basingstoke Road in South Reading is a lower tier establishment and has consent for the storage of liquefied petroleum gas. The most recent consent in 2009 allows storage of up to 319 tonnes.

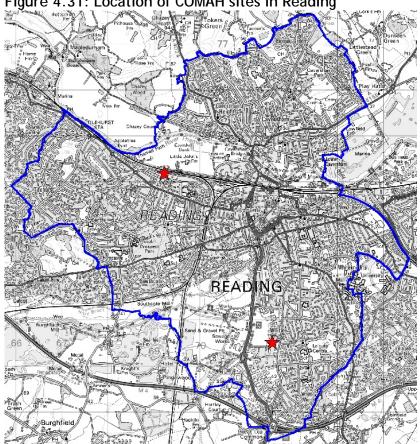


Figure 4.31: Location of COMAH sites in Reading

The Atomic Weapons Establishment site at Burghfield is located in West Berkshire District, just over 1.5 km from the Reading Borough boundary. The activities within the site include final assembly, maintenance and decommissioning of warheads. The middle and outer consultation zones extend into Reading and affect parts of the South and West of the Borough.

- Proficiency in English can be a particular issue in planning for evacuation in the event of a major accident. According to the 2011 Census, 2.1% of Reading's residents cannot speak English well compared to 0.9% for the South East as a whole, which makes this a particular issue for Reading.
- There is an existing policy in the Sites and Detailed Policies Document (PP006) on Hazardous Installations (DM20), which ensures that the amount, type and location of hazardous substances would not pose adverse health and safety risks to the surrounding population and environment; and that any necessary special precautions to limit other potential societal risks to acceptable degrees would be put in place prior to the development commencing.

4.58.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

OU2(i) No policy - REJECTED This option would fail to give adequate consideration to potential hazards, and as such risks failing legal requirements for land use planning. It would not set out a clear approach for dealing with proposals for hazardous installations, or for proposals close to existing installations.

 OU2(ii) Must not pose health and safety risks and potential risks must be safeguarded against - PROPOSED OPTION This option would continue the existing policy approach from the SDPD. There is not considered to be any reason for any significant change from this existing approach, as it has provided clear and effective policy since adoption of the SDPD.

4.59 Telecommunications Development (OU3)

4.59.1 *Key Considerations*

- The NPPF dictates that Local Plans should include strategic policies to deliver the provision of telecommunications (paragraph 156). It also ensures that local authorities support the expansion of electronic communications, including telecommunications, whilst at the same time minimising masts and using existing structures where possible (paragraph 43). There should be no areawide ban applied to telecoms infrastructure (paragraph 44).
- With high levels of congestion relating to commuting, there is a clear need for high-quality communications infrastructure to be enabled to allow more flexible work patterns, including home-working.
- There are around 110 sites making up the mobile network in Reading, and the Council maintains a register of existing and proposed telecommunications base stations, as required by past national guidance⁴⁹.
- The Council has previously advocated lamp column swap-outs as a means to provide the necessary infrastructure without leading to a proliferation of structures in an area.
- There is an existing policy DM21 in the Sites and Detailed Policies Document (PP006) on Telecommunications Development, which supports proposals for

⁴⁹ <u>http://www.reading.gov.uk/article/10023/Telecommunications</u>

telecommunications providing that consideration is given to use of existing sites and structures. This approach has been effective in dealing with relevant applications, and has not served to block the provision of infrastructure.

4.59.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• OU3(i) No policy - REJECTED

This option would fail to comply with the NPPF in that it would not set out strategic policy for communications infrastructure, and it would fail to provide clarity on how applications for telecommunications development will be dealt with.

• OU3(ii) Continue existing policy - PROPOSED OPTION

This option would continue a policy approach which has proven simple and straightforward to operate, and gives clear, effective guidance on applications for telecommunications development. No particular concerns about the approach from operators or members of the public have been expressed.

4.60 Advertisements (OU4)

4.60.1 Key Considerations

- The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 requires that control of advertisements is to be exercised in terms of amenity and public safety only.
- The NPPF states that control over advertisements should be efficient, effective and simple.
- There were 1,037 applications for advertisement consent received in the ten years between 2007 and 2017.
- There is an existing policy DM22 in the Sites and Detailed Policies Document (PP006) on advertisements, which has proven to be effective in controlling outdoor advertisements, and which continues to comply with legislation and national policy. This replaced an extensive set of guidelines in the 1998 Local Plan which would not have provided the efficient, effective and simple control required by the NPPF.
- The Institute of Lighting Professionals publishes guidance on levels of illumination, which is updated periodically and which should be referred to. The most recent version is from 2015.

4.60.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• OU4(i) No policy - REJECTED

This option would fail to provide a clear and effective policy basis for assessing advertisement applications, and would mean a reliance on national policy only or on other, more general policies on matters such as design. This would give little clarity to applicants and would risk inconsistency in decision-making.

• OU4(ii) Continue existing policy - PROPOSED OPTION This option would continue a policy approach which has proven simple and straightforward to operate, and gives clear, effective guidance on advertisement applications. There remains the option of Supplementary Planning Documents should more detailed guidance be necessary.

4.61 Shopfronts and Cash Machines (OU5)

4.61.1 *Key Considerations*

- Reading has a good stock of attractive streets and traditional frontages, but in many cases traditional shop fronts have been replaced by insensitive designs which bear no relationship to the building into which they have been inserted.
- There were 118 applications for changes to shopfronts in the period 2007 to 2017.
- There is an existing policy DM23 in the Sites and Detailed Policies Document (PP006) on shopfronts and cash machines, which has proven effective in dealing with relevant proposals.
- The inclusion of a cash machine on a shopfront can also have implications in terms of character of the street scene, design of the shop and safety and security.

4.61.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• OU5(i) No policy - REJECTED

This option would mean relying upon a general design policy and on national policy, which does not deal specifically with shopfronts. This would give little clarity to applicants and would risk inconsistency in decision-making. It could result in a proliferation of shopfronts in centres with little regard to their overall effect on the townscape or vitality and viability of the centre.

• OU5(ii) Continue existing policy - PROPOSED OPTION This option would continue a policy approach which has been effectively applied in recent years and has been successful in resisting inappropriate proposals.

4.62 Definition of Central Reading (CR1)

4.62.1 *Key Considerations*

- The NPPF states that local plans should "define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations" (paragraph 23).
- The NPPF also contains a sequential approach to the location of main town centre uses in paragraph 24, which should be in town centre locations first, followed by edge of centre and finally out of centre locations. In order to operate this sequential approach, the town centre will need to be defined.
- The current definition is set out in policy RC6 of the Reading Central Area Action Plan (PP005). Different definitions are used for retail, offices and other

uses including leisure. The office core is based on distance from the station, whilst the leisure core extends up to the Thames to take in opportunities for riverside leisure. The policy includes an extension of the primary shopping area to the north of the station, to come into force when pedestrian crossings of the railway are improved. The new underpass has now improved these crossings.

4.62.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• CR1(i) No policy - REJECTED

This alternative would not be in conformity with the NPPF which states that local authorities should define their primary shopping area for retail and the town centre for other uses. Using the central area boundary as a town centre definition would mean that development takes place in a more dispersed fashion. The compact nature of the centre would be lost, and this would make it less possible to access by foot and rail, and therefore promote less sustainable modes of travel.

• CR1(ii) Continue current policy - PROPOSED OPTION

This option would continue the existing policy approach, where three different centre definitions are used. A primary shopping area is defined based on the existing shopping core and taking in adjacent sites where there is an opportunity to help to deliver the identified retail need. It includes an extension north of the station, and as the links across the station have now been delivered, there is no need to make this extension dependent on future improvements (as existing policy RC6 does). An office core is defined based on accessibility by public transport, and is therefore focused on the station. A central core for all other main town centre uses, particularly leisure, is broadly related to the primary shopping area, but slightly wider, as leisure uses tend to be destinations in themselves and do not need to be in as compact a pattern as retail. This also takes in the areas where leisure development next to the Thames can complement the riverside.

As the overall pattern of uses in the centre has not changed since the adopted policy, and the main development opportunities remain broadly the same, there is not considered to be a need to substantially change this policy approach.

4.63 Design in Central Reading (CR2)

4.63.1 Key Considerations

- Section 4.7 has already highlighted the need for policies to ensure a high quality of urban design in new developments. However, the town centre is an environment where a number of different design considerations apply than in the rest of the Borough.
- In 2008, Entec UK Ltd produced a City Centre Framework Update (EV032), which looked at design issues within the centre of Reading. It was an update of an earlier (2002) City Centre Framework document. This document focuses on three key elements of the design strategy:
 - Layout: urban structure and grain;

- Density and mix of uses; and
- Scale: height and massing.
- In terms of layout, the Framework recommends continuation of the historic urban structure and grain, which consists of a north-south and east-west grid pattern, onto new development areas. This seeks to achieve enhanced character, through identity and a sense of place, greater ease of movement and permeability, and improved legibility.
- The Framework also seeks a broad mix of uses, with the focus on target uses such as offices, retail, residential, leisure, community and culture. This helps to reinforce the character of the area, as well as helping to achieve a more legible central area. In addition, active uses will help to define a vibrant building edge, enhancing the continuity and enclosure of the area.
- The result of all the above considerations is an overall framework plan for design in the central area. The Framework also goes on to deal with strategies for the three Major Opportunity Areas. Finally, it deals with guidance for how streets and spaces should be treated, looking at matters such as signage and legibility, lighting, public art, buildings and frontages, and a strategy for linking key areas of open space.

4.63.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• CR2(i) No policy - REJECTED This approach would mean reliance on the overall design policy, CC7, for any development in the centre. However, this is not centre-specific and could therefore result in development that does not take sufficient account of centre-specific matters such as the urban grid and need for adaptability.

• CR2(ii) Continue current policy - PROPOSED OPTION

It is important that development respects the particular character and other qualities of the central area, such as its historic character, the fine grained grid structure of streets, the high quality character of many of its streets, the various changes in levels across the centre, its waterspaces, open spaces and public realm. At the same time there are areas that need, sometimes considerable, improvement. The barriers formed by the railway, IDR and in some areas water, need to be broken down and the centre integrated better with adjoining areas. Some sites and areas have become old and dilapidated and are in need of regeneration.

The proposed approach adds the following key elements/themes of the City Centre Frameworks and other publications into the design strategy as follows:

- Urban grid: building on the existing urban grain, good permeability and connectivity, creating a sense of place and active frontages;
- Public realm: well-designed public squares and public realm;
- High quality materials and details;
- Uses: mixing uses and residential tenures; and
- Diversity and flexibility: a diverse area, which is flexible to take account of changing circumstances and which enhances community safety.

4.64 Public Realm in Central Reading (CR3)

4.64.1 *Key Considerations*

- Section 4.18 already recognises the importance of providing open space as part of new development. The NPPF states that "Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities" (paragraph 73).
- The Open Spaces Strategy (EV021) looks at levels of open space in detail, and divides these into three different levels of accessibility: unrestricted, limited and restricted. There are 43.7 hectares of unrestricted access open space in central Reading, with 0.3 hectares of limited and 5.7 hectares of restricted access. However, this disguises the fact that this open space is overwhelmingly north of the railway, including King's Meadow, the Coal Woodland, Hills Meadow and Christchurch Meadow. South of the railway line has only small areas of open space, most significantly Forbury Gardens and the Abbey ruins, as well as built open spaces such as the Oracle riverside and the station squares.
- On sites with restricted space in the centre of Reading, opportunities for providing substantial green space are few and far between. The Open Spaces Strategy holds specific provisions for the centre, such as the creation of a coherent series of public space experiences (paragraph 7.7.7). These can be streets as well as spaces. There is therefore clearly a centre-specific approach to open spaces which needs to be articulated through the Local Plan.
- The Council's waterways vision (2005) is specific to central Reading and recognises the different characters of the two rivers, using the concepts of 'Tranquil Thames' and 'Urban Kennet'. More recently, the Reading 2050 vision (OP009), launched in 2017, is based around three core themes, one of which is a 'City of Rivers and Parks'. This sets out ambitious goals that involve the use of the watercourses, and celebrates the role that the water has played in the history of Reading, and looks to build on this as a key part of Reading's future.
- The current policy RC14 in the RCAAP (PP005) has two purposes. Firstly, it protects key existing areas of open space in the town centre. This is a role which will largely be replaced by the Local Green Spaces policy (EN7). The other role of the policy is to set out the expectations for provision of new open space and public areas in the centre.

4.64.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• CR3(i) No policy - REJECTED

There would not be any policy to provide a clear and consistent basis for seeking additional open space in the centre of Reading, and this would mean that opportunities to create a high quality public realm throughout the centre, one of the main aims of the strategy of the centre, would be lost.

• CR3(ii) Continue with current policy (RC14 RCAAP) but defer open space protection to EN policies - PROPOSED OPTION This approach would continue the same approach for additional open space as the current RCAAP policy, although it would include more focus on the contribution that can be made to the setting of the historic environment, in line with the generally greater focus on heritage in the plan as a whole. A centre-specific approach that recognises the distinct role of open space in the centre as opposed to elsewhere is required. However, the inclusion of specific sites for protection is not necessary, as this role is fulfilled by other policies.

One hectares is the appropriate threshold for provision of on-site open space in central Reading, as it captures the sort of size of site that ought to make such a provision, such as Station Hill and Hosier Street. There may be some developments below that threshold where new open space provision is appropriate, and all developments should make general improvements to the public realm, but the nature of this will need to be decided on a case-by-case basis.

 CR3(iii) Edited RC14 with specific open space creation requirement -REJECTED

This approach would involve a specific quantified target for additional open space as part of a development. It would be overly prescriptive in the central area. The appropriate amount of open space to be provided will be dependent on the characteristics of each area – in these cases, quality can be more important than quantity, and the locations of these open spaces in terms of the network of streets and pedestrian routes is also vital. In addition, once a threshold was exceeded, it sends out the message than no additional open space is required, which may not be the case.

4.65 Leisure, Culture and Tourism in Central Reading (CR4)

- 4.65.1 *Key Considerations*
 - NPPF paragraph 23 states that local plans should "allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres."
 - Central Reading contains a wide range of built leisure, culture and tourism uses, including a cinema, theatre, museum (including art gallery), swimming pools (indoor and outdoor), library, casinos, gyms and a significant number of cafes, restaurants, bars and clubs. These are complemented by the opportunities for more informal recreation in open spaces, particularly along the Thames, and tourist opportunities to be enhanced when the Abbey Quarter project is completed.
 - The Western Berkshire Retail and Commercial Leisure Assessment 2016 (EV020) looked at the need for additional commercial leisure facilities in Reading over the plan period. It largely came to the conclusion that the highest order centres, including Reading, are relatively well provided for. Specific qualitative gaps in Reading were for an entertainment venue (ice skating/bowling) and for additional cinema facilities (ideally independent/arts-focussed). However, there are plans to provide an ice rink adjacent to the Madejski Stadium as part of the Royal Elm Park proposals, which were permitted subject to the signing of a Section 106 agreement in April 2017 (reference 160199). Meanwhile, the permission at St Martin's Precinct in Caversham (ref 140997) includes the provision of leisure floorspace, which is restricted by planning condition to cinema use. Therefore, existing proposals cover these qualitative needs to a degree.

- The Reading 2050 vision, launched in 2017 (OP009), is based around three core themes, one of which is a 'City of Rivers and Parks'. This celebrates the role that the water has played in the history of Reading, and looks to build on this as a key part of Reading's future, including its role as a location for sport, recreation and leisure.
- Consultation on a successor to the Thames Waterways Plan in 2015 identified a number of principles that should feed into planning policy, including protecting, promoting and enhancing the use of the Thames for both recreation and water-related sport and for public access.
- There is an existing policy RC7 in the RCAAP (PP005) which seeks to encourage new facilities, prevent the loss of existing facilities, provide guidance on design, and address the importance of the Thames.

4.65.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• CR4(i) No policy - REJECTED

This approach would result in a loss of an opportunity to set out the need to expand leisure facilities in the centre, which would mean that opportunities to make provision for leisure and retailed uses may be missed. The approach would also not take advantage of opportunities to promote the leisure and recreation function of the Thames.

- CR4(ii) Continue with current policy (RC7 RCAAP) PROPOSED OPTION This approach offers general encouragement to the provision of additional leisure facilities in the centre of Reading, recognising that centres are increasingly relying more on their role as a leisure destination as opposed to a pure focus on retail. It would also particularly recognise the role of the Thames in providing a destination for leisure and recreation. However, it is considered that the comments in the existing policy RC7 on proposals for the loss of leisure are better dealt with in a consistent, Borough-wide approach, in particular in response to comments made by Sport England at Draft Local Plan stage.
- CR4(iii) New policy that prioritises specific leisure facilities REJECTED This approach would need to be backed up by clear evidence of needs. However, of the qualitative needs identified in the Retail and Commercial Leisure Assessment, ice skating and additional cinema facilities are already to be provided elsewhere as part of existing proposals. Other known priorities are for replacement swimming provision and replacement theatre, due to the inadequacy of existing provision, but the Local Plan already identifies these in site specific policies for Rivermead (WR3d) and Hosier Street (CR12d). In addition, this approach would risk freezing the leisure needs at one point in time, and would be inflexible and potentially quickly out-of-date. Within the 20-year period of the plan, new types of leisure facilities may be in existence, and the changing demographics of Reading may mean needs change.

4.66 Drinking Establishments in Central Reading (CR5)

4.66.1 Key Considerations

- The Council's Licensing Policy Statement (October 2013) sets out the policy which will inform decisions on licensing applications. Under the Licensing Act 2003, the licensing authority has a duty to carry out its functions with a view to promoting four objectives:
 - 1 Prevention of crime and disorder
 - 2 Public safety
 - 3 Prevention of public nuisance
 - 4 Protection of children from harm

The aim of the policy statement is to marry these objectives with an aim of facilitating a sustainable entertainment and cultural industry. The Council wish to promote 'a diverse entertainment culture which attracts a whole range of people in terms of age, gender and ethnicity' (p5). As a result, the Council are likely to support, within the context of the above objectives, premises with activities suitable for all age ranges, which discourage primarily or exclusively alcohol based activities and promote Reading's artistic and cultural life. The Council operates a Cumulative Impact Policy for a 64 ha area of central Reading. Within this area, the approach is that licences will not be granted for late night food outlets operating beyond midnight, off-licenses selling alcohol beyond midnight, and for all bars, clubs and music and dancing venues. Other types of premises such as traditional pubs and café-bars are less of a concern.

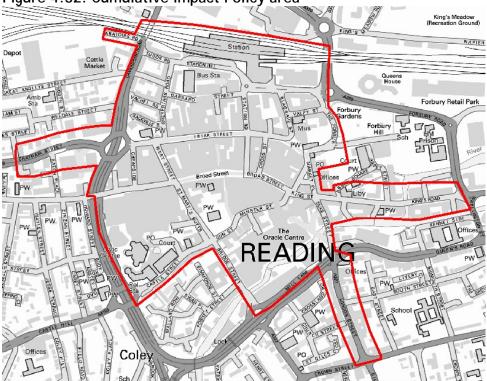


Figure 4.32: Cumulative Impact Policy area

- The Reading CIP area, shown in Figure 4.32, provides a good approximation of the main concentration of drinking establishments in the centre. Within that area, the total number of licensed premises at 1 January 2013 was 174, 28.8% of the total number of licensed premises within the Borough. The breakdown was as follows:
 - Restaurant 57

- Bar 24
- Takeaway/Fast Food 20
- Nightclub 10
- Pub 19
- Off licence 24
- Social Club 6
- Hotel 7
- Special Events 4
- Theatre 1
- Cinema 1
- Casino 1

(Source: Licensing Policy Statement 2013)

• The RCAAP (PP005) contains an existing policy (RC8) which seeks to broaden the range of drinking establishments, and move away from a focus on 'vertical drinking', in line with the approach of the licensing policy.

4.66.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

CR5(i) No policy - REJECTED

The effect of this policy approach would be to continue provision for drinking uses, without seeking increased diversity in the offer of drinking uses. Therefore, the perception would continue to be that the centre is orientated towards young vertical drinkers in the evening, with associated amenity and crime and disorder effects.

- CR5(ii) Continue with current policy (RC8 RCAAP) PROPOSED OPTION This approach would continue the existing policy approach of seeking diversification of the town centre evening offer. This is considered to be an appropriate way of addressing the issue, as it is in line with the licensing policy approach without duplicating it. It also considers matters such as accessibility to public transport. This approach will ensure that a diverse evening economy continues to make significant contributions to the economic success of the centre.
- CR5(iii) Restrict total number of establishments REJECTED This approach would be supported by a segment of public opinion, and the perception is that it would assist in combating crime and disorder associated with the evening economy. However, sufficient evidence does not exist to justify taking such a restrictive approach. Any overall limit would in any case be arbitrary and difficult to justify through evidence. The key lies rather in increasing the diversity in the leisure offer during the evenings, so that the

centre is not dominated by a single group of users. Restrictions on types of premises on the basis of crime and disorder is already dealt with through licensing powers, so this approach would also be an unnecessary duplication.

 CR5(iv) Restrict new establishments to existing clusters within the centre -REJECTED

One of the main advantages of the concentration approach to drinking uses is often said to be ease of policing, by containing associated disorder within a limited area. However, an approach of 'clusters' would undermine the aim to ensure diversity and activity at all times across the commercial core of the centre. There should not be locations in the centre which are thought to be foci of disorder, rather there should be 18-hour activity in as many parts of the central core as possible.

 CR5(v) Allow limited amount of establishments outside the town centre -REJECTED

This approach would lead to more of a dispersal pattern, with drinking establishments being located outside the established central core. Whilst this may be acceptable in some cases, as a deliberate option it would be likely to lead to significant effects on the amenity of residents of these outlying areas, as well as directing drinkers to areas where they are less well-served by public transport options.

4.67 Living in Central Reading (CR6)

4.67.1 Key Considerations

- Paragraph 23 of the NPPF requires Local Plans to "recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites".
- Consultation on changes to national planning policy in December 2015 suggested changes to be made to the NPPF to require local authorities to plan for high density residential development around commuter hubs. The core of the centre of Reading would certainly qualify as a commuter hub given its accessibility by public transport.
- The centre of Reading was, until relatively recently, not somewhere where significant numbers of people lived, at least not within the core of the centre inside the Inner Distribution Road. However, over the last twenty years or so this has changed dramatically. Figure 4.33 shows trends in the amount of housing in Abbey ward since the 2001 Census. Abbey ward covers much, although not all, of central Reading. There has been an 85% increase in housing in the ward over that period. On 31 March 2017, there were 313 additional dwellings under construction and 796 with planning permission but not commenced. The centre is now a place where many people live, and it is important to address the issues that this throws up.

	Units (net)
Dwellings 2001 Census	4,195
Dwellings 2011 Census	6,783
Completions 2011-2012	29
Completions 2012-2013	34
Completions 2013-2014	53
Completions 2014-2015	176
Completions 2015-2016	297
Completions 2016-2017	383
Total Dwellings 2017	7,755

Table 4.33: Dwellings in Abbey Ward

• Dwellings in the centre are overwhelmingly small. Table 4.34 below shows that almost three quarters of homes in Abbey ward had up to 4 rooms (approximately equivalent to 1-2 bed dwellings) in 2011, a much higher proportion than for Reading as a whole, or the South East or England and Wales. It should be further noted that much of the housing in Abbey ward

consists of terraced homes on the fringes of the centre, and that within the core of the centre there is likely to be an even greater prevalence of small homes.

	1 room	2 rooms	3-4 rooms	5-6 rooms	7+ rooms
Abbey Ward	3%	17%	52%	22%	6%
Reading Borough	1%	5%	32%	43%	18%
South East	1%	3%	28%	42%	27%
England and Wales	1%	3%	29%	44%	23%

Table 4.34: Size of household spaces at 2011

Source: Census 2011

- This pattern has been emphasised by recent developments. Analysis of housing developments with planning permission in 2015-16 reveals that, of those where dwelling size was known (i.e. not including outline permissions), 58% were 1-bed, 37% were 2-bed, 6% were 3-bed and 1% were 4+ bed. There seems to have been a shift towards 1-bed from 2-bed in recent years, as a similar analysis to support the RCAAP in 2007 found 31% of dwellings completed or under construction were 1-bed whilst 63% were 2-bed. This appears to be at least in part related to prior approvals to convert offices to housing. If prior approvals are excluded from the 2015-16 analysis, there would have been 34% 1-bed and 54% 2-bed, which is much more in line with the pattern in 2007, and more reflective of the RCAAP mix policies.
- The centre is clearly a distinct environment from much of the rest of Reading as a place to live. There is more noise, generally poorer air quality (with most of the centre covered by the AQMA), less opportunities for private outdoor space and car parking, but at the same time greater access to shopping and leisure and public transport links. Those who live in the centre are much more likely to be young. 49.1% of residents of Abbey ward were aged 18-34 in 2011, compared to an average of 32.0% for the Borough. There were also less likely to be dependent children, with 13.9% of residents of Abbey aged 0-17 compared to 20.4% of Reading residents.
- There is an existing policy on living in the centre (RC9) in the Reading Central Area Action Plan (PP005). This sets expectations in terms of mix, requiring a maximum of 40% 1-bed accommodation and minimum 5% 3-bed on developments of 15 or more dwellings. The policy also seeks to avoid an over-concentration of single-person affordable accommodation, which tends to house particularly vulnerable people, who may be less appropriately housed in an environment where they are exposed to high levels of noise and activity. It also considers the relationship with noise, air quality and community infrastructure, and seeks to avoid proposals for serviced accommodation being used as a way to avoid affordable housing contributions.

4.67.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• CR6(i) No policy - REJECTED

Under this approach, the lack of clarification that housing should not be located adjacent to likely sources of noise and disturbance, where the effects of this cannot be mitigated through design or other measures, could result in potential conflicts between uses. The potential location of social renting accommodation in the central area could lead to vulnerable people living in a high-pressure environment. In some cases, this may not be the best living environment for these people. It would also be difficult to secure a mix of housing type without setting out how to achieve the mix. As a result, there may be a tendency for smaller units, which will exaggerate the current trend towards young, single and childless people in the centre, and would not allow for different types of people to be attracted to live.

• CR6(ii) Continue with current policy (RC9 RCAAP) - PROPOSED OPTION The approach in the RCAAP continues to be the most appropriate way forward. In terms of mix, what is required is a degree of flexibility to allow those people who wish to stay in the centre as their families grow to do so, and for those who require different accommodation to at least have the option of living in the centre. Whilst houses with gardens are rarely deliverable in the centre, flats can still be a range of sizes and tenures. A domination of one bedroom uses would artificially restrict the range of people living in the centre to single and primarily young people who would be likely to move out as they grow older. The flexibility required can be implemented by a check on the dominance of smaller accommodation, which can be translated into a minimum percentage of 3- or more bed dwellings (5%) and a maximum percentage of one-bed dwellings (40%), based on what is known to be deliverable in recent development.

The issues that the RCAAP policy recognises in terms of single person socialrenting, serviced apartments and the noise and air quality issues continue to be relevant considerations, and should remain within the policy. However, references to provision of community facilities can now be included in a general policy (CC9).

- CR6(iii) More aspirational split of dwelling sizes REJECTED This approach would step over the line from being a check on the potential dominance of smaller units to being an attempt to fix the market, and would be unnecessarily inflexible. Some provision of larger units is desirable, but a more ambitious approach may well result in requiring more than the market exists for, and being undeliverable. This may also not be the most efficient use of highly accessible land.
- CR6(iv) Less aspirational split of dwelling sizes REJECTED
 This alternative is likely to mean that a genuine mix of accommodation would
 not be achieved. Many developments are likely to include only 1- and 2-bed
 accommodation. This will continue to mean that the centre is a location
 where people mainly live for only a period of their lives, and that they must
 move out as their circumstances change. This will fail to result in a mixed
 community in the centre.

4.68 Primary Frontages in Central Reading (CR7)

4.68.1 *Key Considerations*

• National policy states that, in drawing up Local Plans, local authorities should:

"define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations" (paragraph 23)

• The RCAAP (PP005) contains an existing policy RC10, which identifies

existing key frontages where there should be an active town centre use with a display window, and proposed key frontages within development areas where new active frontages should be created. Within the selected pool of active town centre uses, the policy does not seek to prioritise any particular use.

• In terms of existing proportions, a sample of the existing town centre frontages are set out in table 4.35. Not all streets are included, but the sample includes mainly those streets on the edge of the shopping core where a more diverse split of uses is likely to be encountered. Core streets such as Broad Street are much more dominated by A1 retail.

Street	% A1	% A2	% A3	% A4	% A5	% C1	% D1	% D2	% SG
Cross Street	52.6	30.9	33.9	0	0	0	0	0	12.2
Duke Street	60.3	0	29.9	0	0	0	0	0	0
Oxford Road	54.5	7.8	4.3	0	2.7	0	0	1.2	8.4
Queen Victoria Street	57.6	15.0	11.5	0	0	0	0	0	13.2
St Mary's Butts	31.4	0	57.2	8.8	0	0	0	0	0
Station Road	14.6	24.1	19.4	15.7	8.8	0	0	0	4.0
West Street	48.8	8.5	12.5	0	3.7	1.3	0	0	23.1

Table 4.35: Proportions of key frontage in town centre use classes on selected town centre streets

• Generally, most streets on existing key frontages are at least around half in A1 retail use, although there are some streets where the proportion falls well below that.

More generally, maintaining active frontages with display windows assists in encouraging pedestrian movement around the centre. Such frontages can be achieved by a number of land uses that complement the retail function of the centre. These include retail (A1), financial and professional (A2), restaurants and cafes (A3), drinking establishments (A4), takeaways (A5), hotels (C1 - where there are active elements such as bars or restaurants), non-residential institutions such as museums, health clinics or art galleries (D1) and leisure uses (D2), and therefore all of these uses can be appropriate on these frontages. Some sui generis uses, such as amusement arcades will also be suitable. However, residential or office uses will not usually be able to create this visual interest and activity.

4.68.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• CR7(i) No policy - REJECTED

This would generally mean reliance primarily on the design policy, which seeks uses that face the street. This could mean loss of existing ground floor active uses, and therefore reduced activity and visual interest on key town centre streets. It would also result in new developments that would create new streets and spaces could take place without uses that enliven those spaces and provide ground floor activity.

• CR7(ii) Continue with current policy (RC10 RCAAP) - REJECTED This approach would ensure that existing vital streets that provide activity and visual interest to the town centre continue to do so, and would also mean that new development in important locations that link into key corridors of movement through the centre would also provide that activity and interest. It would continue to allow changes of use within the defined uses without any attempt to maintain a particular retail character, and there are concerns that this will lead to a situation where the diversity of parts of the centre is reduced and they will cease to contribute to the important retail role of the centre.

 CR7(iii) Restrict changes of use more in the town centre - PROPOSED OPTION

This would have the same benefits in terms of providing active frontages as CR7(ii). In addition, it would address the issue of the erosion of retail uses in parts of the town centre. In smaller centres, the policy is based on the proportion of the length of the identified frontage in the whole centre in A1/A2 use (with A2 use being included due to the ability to change between A1 and A2 without planning permission). However, a similar policy would be very difficult to operate in the centre of Reading as it would mean a survey of the whole centre for each application, which would take a considerable amount of time and resources. It would also not address the concerns about specific streets rather than the overall whole. Therefore, the proposed policy approach groups frontage by street, and uses a 50% A1/A2 threshold, to ensure that in overall terms the retail character of individual streets is maintained.

4.69 Small Shop Units in Central Reading (CR8)

4.69.1 Key Considerations

- The NPPF requires that Local Plans "promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres" (paragraph 23).
- One of the constants that usually emerges from planning consultations involving retail development is the perceived need to encourage smaller independent or specialist traders. There is a perception that Reading is a town centre dominated by multiple retailers, and in the past the accusation has been levelled that Reading is a 'clone town'. In reality there is nothing that the planning system can do to control who occupies shop units. However, it can have an effect on the size of retail units, to ensure that smaller occupiers (who are not necessarily independent or specialist, but who are more likely to be) have sufficient units available to them.
- The RCAAP (PP005) included policy RC11 that sought to prevent amalgamation of frontages of small units, and seek provision of additional small shop units in new retail development.
- There are existing concentrations of small shop units, defined in the RCAAP as less than 75 sq m, in the two arcades, the Harris and Bristol and West Arcades, and also in the side streets on either side of Broad Street, namely Cross Street, Queen Victoria Street, Union Street and Chain Street. Few units on the more major streets such as Broad Street and Friar Street are this small.

4.69.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• CR8(i) No policy - REJECTED

- This would mean that there is a risk of amalgamation of small units into larger units as the centre expands. One way in which this might occur is that smaller shops may be pushed out to the fringes of the centre while units formerly occupied by these uses are amalgamated and occupied by larger uses. Given that one of the main strategic aims is to seek diversity in the core of the centre, it would be unfortunate to lose the variety in size of accommodation here. It could also result in large retail schemes without the diversity of new small units.
- CR8(ii) Continue with existing policy, strong language for inclusion of small shops (RC11 RCAAP) PROPOSED OPTION
 This approach would prevent the amalgamation of small shop unit frontages as a way to try to protect the existing diversity of the shopping offer in the town centre, and particularly in those areas which are characterised by such small units. It would also seek new provision of small units as part of new development, in order to help to provide this diversity, although it is only reasonable to do so where retail proposals are already multi-unit schemes.
- CR8(iii) No strong requirement for major development to include provision for small shops REJECTED This would fail to provide a range of units as part of the retail offer in the centre, and would undermine the aim of providing diversity in the centre.

4.70 Terraced Housing in Central Reading (CR9)

4.70.1 Key Considerations

- The existing strategy for the central area, although seeking high-density, modern development in some parts, also emphasises the need to protect those aspects that contribute to the unique character of the centre. The small fragments of terraced housing that are dotted around the central area are among these aspects, forming an unusual contrast with their high-density surroundings.
- The RCAAP (PP005) includes a policy (RC12) that sought to protect five areas of traditional terraced housing within the central area. These areas all remain in place.
 - Blakes Cottages
 - Queen's Cottages
 - Crane Wharf
 - Sackville Street & Vachel Road
 - Stanshawe Road

4.70.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• CR9(i) No policy - REJECTED

Under this approach, many of the areas are in locations which are likely to come under pressure for higher-density development in the near future. These terraces are a key component of the character of the centre, and it will be vital to retain as much of the character as possible in future developments. Therefore, a no policy approach would not be acceptable.

- CR9(ii) Protection of waterside terraced housing only REJECTED This approach would mean that the areas of waterside character would be protected, reflecting the importance of the waterside environment, and the areas west of Greyfriars Road would remain unprotected. In the unprotected areas, there would be similar effects to a 'no policy' approach, meaning that the character of these areas would be eroded.
- CR9(iii) Continue with current policy (RCAAP RC12, protection of waterside terraced housing, Sackville St and Vachel Rd and Stanshawe Rd) - PROPOSED OPTION

This option would continue the current policy approach. It would help to preserve those areas which are integral to the character of central Reading.

4.71 Tall Buildings (CR10)

4.71.1 Key Considerations

- Central Reading is an established location for tall buildings, which the Council defines as being over 10 commercial storeys or the equivalent There are seven existing tall buildings in the centre (including one building under construction), and planning permission exists for an additional seven buildings.
- In recognition of the potential for tall buildings in the centre, the Council commissioned Entec UK Ltd to prepare a Tall Buildings Strategy (TBS; EV030) to inform the production of the Reading Central Area Action Plan, and this reported in 2008. This identified locations potentially suitable for tall buildings, and developed a policy approach which became policy RC13 of the RCAAP.
- There have been criticisms through the consultation process that this TBS is ten years old and therefore out of date. The Council has therefore prepared an update note (EV031) which looks again at the TBS approach in the context of changes that have happened over the last 10 years and concludes that the TBS approach remains up to date.
- The TBS together with the update note therefore form the main background to the tall buildings policy. Please see those documents for further information.

4.71.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• CR10(i) No policy - REJECTED

This approach would be insufficient to deal with the significant number of proposals for tall buildings. It says nothing about what tall buildings can contribute to Reading, and how they should be arranged to give the greatest benefits and minimise their negative impacts. It is also not the plan-led approach advocated by Historic England. It could result in a jumble of unrelated and poor quality tall buildings that gives an uninspiring and confused skyline, and without adequate consideration of their effects.

• CR10(ii) Continue current policy (RCAAP RC13) - PROPOSED OPTION The existing tall buildings strategy has been effective in guiding proposals for new buildings and in resisting inappropriate proposals. All permissions and constructions since the policy was introduced were broadly in line with it. The TBS together with the update note have demonstrated that this remains an appropriate approach to tall buildings in Reading, ensuring that highly accessible sites make a significant contribution to meeting development needs, balanced against protecting those features and aspects of the character of Reading that are sensitive to the effects of tall buildings.

- CR10(iii) Include additional sites for tall buildings REJECTED
 This approach would include additional areas for tall buildings. Proposals have
 been previously made around Weldale Street and Kenavon Drive. Whilst it
 might deliver an increase in housing, this approach would fail to take account
 of the evidence set out in the TBS, and would lead to tall buildings in locations
 where they have unacceptable effects on matters such as the historic
 environment, landscape and townscape and residential amenity.
- CR10(iv) Amend to further limit scope for tall buildings REJECTED This approach would further restrict the areas where tall buildings could be acceptable. It would fail to take advantage of the benefits that tall buildings can bring, in terms of accommodating significant amounts of development within areas of high levels of public transport access, and in terms of sending the message that Reading is a thriving centre of regional significance and a leading business location. The TBS has demonstrated scope for tall buildings in the centre of Reading, and there are no reasons emerging from the evidence base as to why there should be further restriction on tall building locations.

4.72 Station/River Major Opportunity Area (CR11)

4.72.1 *Key Considerations*

These sites were assessed through the HELAA process (EV014 and EV015), with the relevant references as follows:

- CR11a: Friar Street and Station Road AB001
- CR11b: Greyfriars Road Corner AB002
- CR11c: Station Hill AB003
- CR11d: Brunel Arcade and Apex Plaza AB067, AB068
- CR11e: North of the Station AB004
- CR11f: West of Caversham Road AB075, AB081
- CR11g: Riverside AB005
- CR11h: Napier Road Junction AB006
- CR11i: Napier Court AB007, AB099 (part)

4.72.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

CR11: STATION/RIVER MAJOR OPPORTUNITY AREA (Overall)

CR11(i) No policy - REJECTED Would fail to reflect the need to make the best use of highly accessible town centre sites to help to meet needs. Would result in a shortfall in housing provision that is approximately 2,500-3,000 dwellings larger. Would lead to continued underuse and poor quality of

		prominent town centre sites.
CR11(ii)	Continue current policy (RCAAP RC1) - REJECTED	Drawing these sites together into a single policy enables a joined-up approach to be taken to help to meet a variety of needs, but it would also potentially understate the potential of the area for meeting needs, and would not reflect the potential to include education to be addressed within the site.
CR11(iii)	Update policy to reflect need for more residential development and encourage education provision - PROPOSED OPTION	This would enable a joined up approach that takes account of the most recent situation.
CR11a: Fr	iar Street and Station Road	
CR11a(i)	Continue current mixed use allocation - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR11a(ii)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing, offices and other uses.
CR11a(iii)	More limited identification of individual sites - REJECTED	This would fail to set out a comprehensive approach across the whole area that makes most efficient use of the sites and ensures they contribute towards a wider spatial approach.
CR11a(iv)	Allocate for residential - REJECTED	Would not allow for new office space to meet needs in one of the most accessible locations in the region directly adjacent to Reading station.
CR11a(v)	Allocate for offices - REJECTED	Office use is part of the mix in the policy. However it would fail to make most efficient use of a highly accessible deliverable/ developable site to help meet identified needs for new housing.
CR11b: Gr	eyfriars Road Corner	
CR11b(i)	Do not allocated - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing, offices and other uses.
CR11b(ii)	Mixed use with leisure and retail on ground floor, 90- 140 dwellings - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR11b(iii)	Office development - REJECTED	Office use is part of the mix in the policy. However it would fail to make most efficient use of a highly accessible deliverable/ developable site to help meet identified needs for new housing.
CR11b(iv)	Residential and office development (up to 60	Would make a less efficient use of this highly accessible site than the proposed

dwellings) - REJECTED

option.

CR11c: Station Hill and Friars Walk

CRIIC: Sta	ition Hill and Friars walk	
CR11c(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing, offices, retail, leisure and other uses.
CR11c(ii)	Continue current allocation - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR11c(iii)	Allocate for offices - REJECTED	This would exclude residential from part of the mix. As well as the very significant needs for new housing, towards which this site can make a significant contribution, this would fail to activate the site outside office hours and would not therefore create the mixed use destination required.
CR11c(iv)	Allocate for residential - REJECTED	Would fail to enliven key streets and spaces within the area immediately at the station entrance, and would not allow for new office space to meet needs in one of the most accessible locations in the region directly adjacent to Reading station.
CR11d: Bri	unel Arcade and Apex Plaza	
CR11d(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing, offices, retail, leisure and other uses.
CR11d(ii)	Mixed use scheme including residential - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR11d(iii)	Retail and related uses - REJECTED	Would fail to make most efficient use of a highly accessible deliverable/ developable site to help meet identified needs for new housing. These uses tend to be lower-rise, and this site has potential for a very high density development.
CR11d(iv)	Office use - REJECTED	Office use is part of the mix in the policy. However it would fail to make most efficient use of a highly accessible deliverable/ developable site to help meet identified needs for new housing.
CR11d(v)	Residential - REJECTED	Would fail to enliven key streets and spaces within the area immediately at the station entrance, and would not allow for new office space to meet needs in one of the most accessible locations in the region directly adjacent to Reading station.

CR11e: No	rth of Station	
CR11e(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing, offices, retail, leisure and other uses, and would fail to connect the important north-south axis through the centre.
CR11e(ii)	Continue current mixed use allocation - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR11e(iii)	Less emphasis on retail and leisure - REJECTED	This site represents the most accessibly located opportunity for provision of retail and leisure uses to meet needs, and less retail provision would also fail to satisfactorily enliven streets and spaces.
CR11e(iv)	Office development - REJECTED	This would exclude residential from part of the mix. As well as the very significant needs for new housing, towards which this site can make a significant contribution, this would fail to activate the site outside office hours and would not therefore create the mixed use destination required.
CR11e(v)	Residential development - REJECTED	Would fail to enliven key streets and spaces within the area immediately at the station entrance, and would not allow for new office space to meet needs in one of the most accessible locations in the region directly adjacent to Reading station.
CR11e(vi)	Locate uses in accordance with flood risk - REJECTED	A development siting uses according to flood risk would not achieve the best layout of uses within the site. Excluding residential from large parts of the site in particular would be likely to be deserted after business hours, and would not deliver the vibrant core to the station area that is required.
CR11f: We	st of Caversham Road	
CR11f(i)	Do not allocate - REJECTED	Would fail to make use of a potentially deliverable/developable site to help meet identified needs for new housing.
CR11f(ii)	Mixed use development - REJECTED	Would fail to make most efficient use of a potentially deliverable/developable site to help meet identified needs for new housing.
CR11f(iii)	Retail/leisure development - REJECTED	Site is outside the primary shopping area, and not in a location which clearly links into the centre. It is not the best location to meet these needs, and doing so would affect its ability to meet more pressing housing needs.
CR11f(iv)	Office development - REJECTED	Site is outside the office core, and with the full need for offices expected to be met on other sites, offices would not be

CR11f(v)	Industrial/warehouse development - REJECTED	the priority in this location. Whilst the existing historic uses remain on site, new development for industrial and warehouse use in this close proximity to residential properties would be likely to have significant detrimental effects on residential amenity.
CR11f(vi)	Medium density residential - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR11f(vii)	Higher density residential - REJECTED	Would be likely to negatively affect the character and residential amenity of the area.
CR11g: Riv	verside	
CR11g(i)	Continue current mixed use allocation - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR11g(ii)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing and leisure, and would fail to connect the important north-south axis through the centre.
CR11g(iii)	Mainly commercial development - REJECTED	Would fail to make most efficient use of a deliverable/developable site to help meet identified needs for new housing.
CR11g(iv)	Mainly leisure development - REJECTED	Would fail to make most efficient use of a deliverable/developable site to help meet identified needs for new housing.
CR11g(v)	Residential development - REJECTED	Solely residential use would not provide uses that enliven the important route through and space within the site.
CR11h: Na	pier Road Junction	
CR11h(i)	Do not allocate - REJECTED	Would fail to make use of a potentially deliverable/developable site to help meet identified needs for new housing.
CR11h(ii)	Continue current allocation for landmark building - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR11h(iii)	Residential with more than one tall building - REJECTED	This would not be in accordance with the Tall Buildings Strategy and Station Area Framework. More than one tall building would result in an overdevelopment of the site, and this has recently been tested in a refused planning application.
CR11h(iv)	Office development - REJECTED	Would fail to make use of a potentially deliverable/developable site to help meet identified needs for new housing.
CR11h(v)	Retail/leisure development - REJECTED	Would fail to make most efficient use of a highly accessible deliverable/ developable site to help meet identified needs for new housing.

These uses tend to be lower-rise, and this site has potential for a tall building.

CR11i: Na	pier Court	
CR11i(i)	Do not allocate - REJECTED	Would fail to make use of a potentially deliverable/developable site to help meet identified needs for new housing.
CR11i(ii)	Residential development excluding the Network Rail depot (180-260 dwellings) - REJECTED	This was originally proposed in the Draft Local Plan, but it would fail to make the most of the full opportunity available to meet needs.
CR11i(iii)	Residential development including the Network Rail depot (210-310 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR11i(iv)	Mixed use office and residential - REJECTED	
CR11i(v)	Office development - REJECTED	Site is in existing office use. It is outside the office core, and with the full need for offices expected to be met on other sites, offices would not be the priority in this location.
CR11i(vi)	Leisure development - REJECTED	

4.73 West Side Major Opportunity Area (CR12)

4.73.1 Key Considerations

These sites were assessed through the HELAA process (EV014 and EV015), with the relevant references as follows:

- CR12a: Cattle Market AB008
- CR12b: Great Knollys Street and Weldale Street AB009
- CR12c: Chatham Street, Eaton Court and Oxford Road AB017
- CR12d: Broad Street Mall AB011
- CR12e: Hosier Street AB012

4.73.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

CR12: WEST SIDE MAJOR OPPORTUNITY AREA (Overall)

CR12(i)	No policy - REJECTED	Would fail to reflect the need to make the best use of town centre sites to help to meet needs. Would result in a shortfall in housing provision that is approximately 2,000 dwellings larger.
		Would lead to continued underuse and poor quality of prominent town centre sites.

CR12(ii) Continue current policy (RCAAP RC2) - PROPOSED OPTION Drawing these sites together into a single policy enables a joined-up approach to be taken to help to meet a variety of needs.

CR12a: Cattle Market

on in ou		
CR12a(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing and retail.
CR12a(ii)	Retail and residential development - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR12a(iii)	Residential without major retail - REJECTED	Would fail to help meet identified needs for new retail and could lead to out of centre retail development.
CR12a(iv)	Commercial development - REJECTED	Site is distant from the core of the centre, and, other than residential, there are no clear commercial needs that this allocation would meet, in comparison to the high level of need for residential.

CR12b: Great Knollys Street and Weldale Street

CR12b(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.
CR12b(ii)	Primarily residential development - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR12b(iii)	Residential development with tall buildings - REJECTED	Area not considered as appropriate for tall buildings in the Tall Buildings Strategy.
CR12b(iv)	Mixed use with commercial emphasis - REJECTED	Site is outside the commercial core of the centre, and there are no clear commercial needs that this allocation would meet, in comparison to the high level of need for residential.

CR12c: Chatham Street, Eaton Place and Oxford Road

CR12c(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.
CR12c(ii)	Mixed use extension to the centre - REJECTED	This was initially proposed for the now completed Chatham Place development, but, although there are some small scale facilities, it is not a continuation of the core of the centre. An extension further to the west would be separated from the core by the Chatham Place development, and would be too remote.
CR12c(iii)	Residential development - PROPOSED OPTION	Considered appropriate designation through HELAA.

CR12c(iv)	Office development - REJECTED	Site is outside the office core, and with the full need for offices expected to be met on other sites, offices would not be the priority in this location.
CR12d: Br	oad Street Mall	
CR12c(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.
CR12c(ii)	Mixed use with retail and leisure on ground floor - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR12c(iii)	Retain mall and development on top - PROPOSED OPTION	The policy allows for this option, but ensures that such a development is accompanied by significant improvements in the appearance of the existing building.
CR12c(iv)	Mixed use with greater office emphasis - REJECTED	Site is further from the station than many of the identified sites, and with the full need for offices expected to be met on other sites, offices would not be the priority in this location.
CR12e: Ho	sier Street	
CR12e(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing and retail.
CR12e(ii)	Mixed use development around civic core - REJECTED	This was the original proposal in the RCAAP, focused around a new Civic Offices. However, the Council has now moved to an existing building, and this option is not deliverable.
CR12e(iii)	Mixed use with residential focus - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR12e(iv)	Retail-led mixed use - REJECTED	Site is not well-located for a retail-led development, as it does not naturally fit into existing town centre loops. It would fail to make the most efficient use of the site to meet the greatest needs, which are for residential.
CR12e(v)	Office development - REJECTED	Site is further from the station than many of the identified sites, and with the full need for offices expected to be met on other sites, offices would not be the priority in this location.
CR12e(vi)	Residential development - REJECTED	This would not provide ground floor uses that would enliven the streets and spaces and allow a contribution to meeting retail needs.

The Cattle Market site (CR12a) has been identified for retail use, but is outside the primary shopping area as defined in CR1. Therefore, a sequential approach in line with paragraph 24 of the NPPF is required. This is set out at Appendix 7.

4.74 East Side Major Opportunity Area (CR13)

4.74.1 Key Considerations

These sites were assessed through the HELAA process (EV014 and EV015), with the relevant references as follows:

- CR13a: Reading Prison AB013
- CR13b: Forbury Retail Park AB014
- CR13c: Forbury Business Park and Kenavon Drive AB015
- CR13d: Gas Holder AB016

4.74.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

CR13: EAST SIDE MAJOR OPPORTUNITY AREA (Overall)

CR13: EAS	I SIDE MAJOR OPPORTUNITY	AREA (Overall)
CR13(i)	No policy - REJECTED	Would fail to reflect the need to make the best use of town centre sites to help to meet needs. Would result in a shortfall in housing provision that is approximately 1,500 dwellings larger. Would lead to continued underuse and poor quality of prominent town centre sites.
CR13(ii)	Continue current policy (RCAAP RC3) - PROPOSED OPTION	Drawing these sites together into a single policy enables a joined-up approach to be taken to help to meet a variety of needs.
CR13a: Re	ading Prison	
CR13a(i)	Do not allocate - REJECTED	This important and prominent historic site is now vacant, and policy should therefore provide guidance on future uses.
CR13a(ii)	Retain building with residential use/student accommodation - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR13a(iii)	Retain building with culture/arts use - PROPOSED OPTION	Policy allows for this as a range of potential uses to give maximum potential for securing beneficial use of this important listed building.
CR13a(iv)	Retain building with hotel use - PROPOSED OPTION	Policy allows for this as a range of potential uses to give maximum potential for securing beneficial use of this important listed building.
CR13a(v)	Retain building with prison use - PROPOSED OPTION	Policy allows for this as a range of potential uses to give maximum potential for securing beneficial use of this important listed building.
CR13a(vi)	Convert building and allow significant surrounding development - REJECTED	Site is a scheduled ancient monument, and there needs to be significant archaeological work before it is established whether additional development can take place.

CR13b: Forbury Retail Park

CR13b: Fo	rbury Retail Park	
CR13b(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.
CR13b(ii)	Residential development with potential retained and expanded retail - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR13b(iii)	Residential without additional retail - REJECTED	Would not provide local facilities to serve, and enliven the heart of, this new residential area.
CR13b(iv)	Allocate for offices - REJECTED	Site is outside the office core, and with the full need for offices expected to be met on other sites, offices would not be the priority in this location.
CR13b(v)	Development including tall buildings - REJECTED	Area not considered as appropriate for tall buildings in the Tall Buildings Strategy.
CR13c: Kei	navon Drive and Forbury Busi	ness Park
CR13c(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.
CR13c(ii)	Mainly residential development - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR13c(iii)	Commercial development - REJECTED	Site is distant from the core of the centre, and there are no clear commercial needs that this allocation would meet.
CR13c(iv)	Mixed-use - REJECTED	Site is distant from the core of the centre, and there are no clear non-residential needs that this allocation would meet.
CR13d: Ga	s Holder	
CR13d(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.
CR13d(ii)	Allocate for residential development - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR13d(iii)	Allocate for commercial development - REJECTED	Site is distant from the core of the centre, and there are no clear commercial needs that this allocation would meet.
CR13d(iv)	Mixed use - REJECTED	Site is distant from the core of the centre, and there are no clear non-residential needs that this allocation

Part of Forbury Retail Park (CR13b) has been identified for retail use, but is outside the primary shopping area as defined in CR1. Therefore, a sequential approach in line with paragraph 24 of the NPPF is required. This is set out at Appendix 7.

would meet.

residential needs that this allocation

4.75 Other sites for development in Central Reading (CR14)

4.75.1 Key Considerations

These sites were assessed through the HELAA process (EV014 and EV015), with the relevant references as follows:

- CR14a: Central Swimming Pool, Battle Street AB057
- CR14b: Former Reading Family Centre, North Street AB019
- CR14c: 17-23 Queen Victoria Street AB061
- CR14d: 173-175 Friar Street and 27-32 Market Place AB032 and AB053
- CR14e: 3-10 Market Place, Abbey Hall and Abbey Square AB022
- CR14f: 1-5 King Street AB062
- CR14g: The Oracle Extension, Bridge Street and Letcombe Street AB026
- CR14h: Central Club, London Street KA030
- CR14i: Enterprise House, 89-97 London Street KA008
- CR14j: Corner of Crown Street and Southampton Street KA002
- CR14k: Corner of Crown Street and Silver Street KA003
- CR14I: 187-189 Kings Road AB076
- CR14m: Caversham Lock Island and Caversham Weir, Thames Side AB029
- As well as the leisure use on Caversham Lock Island (CR14m) itself tested through the HELAA, the weir was put forward for generation of hydropower at the Call for Sites stage, by a community group with the support of Reading Borough Council. This represents an opportunity for generation of renewable energy in Reading in line with the provisions of the NPPF. There is no objection from the Environment Agency to this, subject to specific impacts on the weir being tested at planning application stage.

4.75.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

CR14a: Central Swimming Pool, Battle Street

CR14a(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.
CR14a(ii)	Allocate for residential - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR14a(iii)	Mixed use - REJECTED	Would fail to make use most efficient use of a deliverable/developable site to help meet identified needs for new housing.
CR14a(iv)	Commercial - REJECTED	There is no identified need for a commercial use that could be fulfilled on this site.
CR14a(v)	Education provision - REJECTED	Site too small to fulfil the greatest need, for secondary education.
CR14a(vi)	Allocate for leisure use - REJECTED	Would fail to make use most efficient use of a deliverable/developable site to help meet identified needs for new housing.

CR14b: Reading Family Centre, North Street

CR14b(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.
CR14b(ii)	Residential development (15-22 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR14b(iii)	Higher density residential development (over 40 dwellings) - REJECTED	Would be likely to have detrimental effect on character and residential amenity of surrounding area.
CR14b(iv)	Commercial use - REJECTED	There is no identified need for a commercial use that could be fulfilled on this site.
CR14b(v)	Mixed use - REJECTED	Would fail to make use most efficient use of a deliverable/developable site to help meet identified needs for new housing.
CR14b(vi)	Continuation of education use - REJECTED	Site is not required for education, and this option would not therefore be deliverable.
CR14c: 17-2	23 Queen Victoria Street	
CR14c(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.
CR14c(ii)	Ground floor town centre uses and residential on upper floors - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR14c(iii)	Residential only - REJECTED	Would fail to enliven key town centre streets with a retail use at ground floor.
CR14c(iv)	Office development - REJECTED	Existing use, which does not require policy support.
CR14d: 173	-175 Friar Street and 27-32	Market Place
CR14d(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.
CR14d(ii)	Residential - REJECTED	Would fail to enliven key town centre streets with a retail use at ground floor and retain the arcade which provides small shop units that are important for the diversity of the centre.
CR14d(iii)	Offices - REJECTED	Would fail to enliven key town centre streets with a retail use at ground floor and retain the arcade which provides small shop units that are important for the diversity of the centre.
CR14d(iv)	Retail - REJECTED	This use can be included at the ground floor. Use of whole site would fail to make use of a deliverable/developable site to help meet identified needs for new housing.

CR14d(v)	Leisure - REJECTED	This use can be included at the ground floor. Use of whole site would fail to make use of a deliverable/developable site to help meet identified needs for new housing.
CR14d(vi)	Offices with ground floor retail uses - REJECTED	Policy recognises this as an appropriate alternative, as it largely reflects the existing situation.
CR14d(vii)	Residential with ground floor retail/offices - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR14d(viii)	Leisure with ground floor retail - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.
CR14e: 3-10	Market Place, Abbey Hall an	nd Abbey Square
CR14e(i)	Do not allocate - REJECTED	Would fail to make use of a potentially deliverable/developable site to help meet identified needs for new housing.
CR14e(ii)	Retail and related uses on ground floor with residential/office on upper floors (up to 70 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR14e(iii)	Retail/residential on ground floor and business above - REJECTED	Policy recognises this as an appropriate alternative, as it reflects the existing use.
CR14e(iv)	Offices only - REJECTED	Would fail to enliven key town centre streets with a retail use at ground floor.
CR14e(v)	Higher density residential development (around 100 dwellings or more) - REJECTED	Would be likely to have a significant adverse effect on conservation area, which in this location has a relatively consistent roofline.
CR14f: 1-5	Kina Street	
CR14f(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.
CR14f(ii)	Ground floor town centre uses and upper floors residential - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR14f(iii)	Offices - REJECTED	The need for additional offices is already met.
CR14f(iv)	Residential - REJECTED	Would fail to enliven key town centre streets with a retail use at ground floor.
CR14f(v)	Ground floor retail uses and upper floor offices - REJECTED	The need for additional offices is already met.

CR14g: The Oracle Extension, Bridge Street and Letcombe Street

CR14g: The Oracle Extension, Bridge Street and Letcombe Street			
CR14g(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for retail.	
CR14g(ii)	Development for retail with use of site at Letcombe St for public car park - PROPOSED OPTION	Considered appropriate designation through HELAA.	
CR14g(iii)	Residential development (approximately 200 dwellings) - REJECTED	Use of this site for residential would result in a loss of retail and restaurant use which forms a key part of the functioning of the centre.	
CR14g(iv)	Office development - REJECTED	Use of this site for offices would result in a loss of retail and restaurant use which forms a key part of the functioning of the centre.	
CR14g(v)	Ground floor retail use and upper floors residential - REJECTED	Would fail to make use of a deliverable/developable site to help optimise the site's contribution to meeting identified needs for retail.	
CR14h: Cen	tral Club, London Street		
CR14h(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.	
CR14h(ii)	Residential (8-12 dwellings) with community use – PROPOSED OPTION	Considered appropriate designation through HELAA.	
CR14h(iii)	Higher density residential development (approx. 30 dwellings or more) - REJECTED	Would be likely to have significant detrimental effect on character of surrounding area, including conservation area.	
CR14h(iv)	Offices - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market.	
CR14h(v)	Ground floor retail and upper floors residential - REJECTED	Site is outside primary shopping area, and due to the size of the site would not make any significant contribution to meeting retail needs.	
CR14h(vi)	Ground floor retail and upper floors offices - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market.	
CR14h(vii)	Retail - REJECTED	Site is outside primary shopping area, and due to the size of the site would not make any significant contribution to meeting retail needs.	
CR14i: Enterprise House, 89-97 London Street			

CR14i: Enterprise House, 89-97 London Street

CR14i(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.
CR14i(ii)	Residential (8-12 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.

CR14i(iii)	Higher density residential (at least 20 dwellings) - REJECTED	Would involve significant changes to listed building, and would be likely to have significant detrimental effect on character of surrounding area, including conservation area.
CR14i(iv)	Mixed use (ground floor retail and office and upper residential) - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices or retail.

CR14j: Corner of Crown Street and Southampton Street

CR14j(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.
CR14j(ii)	Residential development (13-19 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR14i(iii)	Higher residential	Would be likely to have significant

Art4j(iii)Higher residentialWould be likely to have significant
development (approx 35
dwellings or more) -
REJECTEDWould be likely to have significant
detrimental effect on character of
surrounding area, including
conservation area.R14j(iv)Mixed use (ground floorThe need for additional offices is

CR14j(iv) Mixed use (ground floor retail/office and upper floors residential -REJECTED The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices or retail.

CR14j(v) Offices - REJECTED The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with

overall strategy for offices.

CR14k: Corner of Crown Street and Silver Street

CR14k(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.
CR14k(ii)	Residential development (36-70 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR14k(iii)	Higher residential development (approx 100 dwellings or more) - REJECTED	Would be likely to have significant detrimental effect on character of surrounding area, including conservation area.
CR14k(iv)	Mixed use (ground floor retail/office and upper floors residential - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices or retail.
CR14k(v)	Offices - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices.

CR14I: 187-189 Kings Road

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CR14I(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.
CR14I(ii)	Change of use (offices to residential or student accommodation) - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR14I(iii)	Mixed use (office/retail on ground floor and residences above) - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices or retail.
CR14m: Caversham Lock Island and Caversham Weir, Thames Side		
CR14m(i)	Do not allocate - REJECTED	Would fail to provide any guidance on

		future use of this prominent site.
CR14m(ii)	Development for water- compatible leisure or tourism uses, including some operational development - PROPOSED OPTION	Considered appropriate designation through HELAA.
CR14m(iii)	Residential development - REJECTED	Location within flood plain means site not suitable for significant residential, and this would also be likely to have significant landscape effects.

4.76 Reading Abbey Quarter (CR15)

4.76.1 Key Considerations

• Reading Abbey was built on the orders of Henry I in the 12th Century, a large royal abbey containing a religious community centred around a church, once one of the largest monasteries in Europe and the fourth largest church in Britain. The Abbey was closed in 1539 as part of the dissolution of the monasteries, and thereafter it fell into disrepair, hastened by the use of stones from the Abbey to create defences during the civil war siege⁵⁰. The ruins were open to the public until 2009, when a condition survey revealed them to no longer be safe. It is a scheduled ancient monument. Figure 4.36 shows the extent of the former Abbey, overlain onto current streets.

⁵⁰ See <u>https://www.readingabbeyquarter.org.uk/history-abbey-quarter</u> for a more detailed summary of the history of the Abbey,



Figure 4.36: Extent of Reading Abbey (source: www.readingabbeyquarter.org.uk)

- The Abbey Quarter comprises the precinct of the former Abbey, which extends well beyond the remaining ruins and into adjoining streets and spaces. The Abbey Quarter is a vision to draw together the heritage within this area into a coherent destination, and this represents a longstanding Council priority.
- The Reading Abbey Revealed Project is a £3.15million project (including £1.77million of Heritage Lottery Fund money) to develop the Abbey Quarter. This includes the following elements:
 - Conservation of the Abbey ruins to enable their re-opening to the public
 - Conservation of the Abbey Gate building
 - Improving signage, marketing and interpretation of the Abbey ruins and wider Abbey Quarter area; and
 - Development of an activity plan.

This project is well underway, with the ruins due to reopen to the public in Summer 2018. More information can be found on the Reading Abbey Quarter website 51 .

• The NPPF specifies that Local Plans should contain a "positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats" (paragraph 126). The Reading Abbey Ruins are currently one of only four assets in Reading on the Heritage at Risk Register.

4.76.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• CR15(i) No policy - REJECTED

This approach would not accord with the NPPF requirement to set out a positive strategy for the historic environment, as it would fail to recognise an existing project to address a vital part of Reading's heritage. Should the implementation of the Abbey Quarter vision require further planning

⁵¹ <u>https://www.readingabbeyquarter.org.uk/</u>

applications to be made, it would not provide necessary planning policy support.

- CR15(ii) Detailed policy to protect the Reading Abbey Quarter REJECTED This approach would be more focused on protection than on a proactive approach to the area. Again, this would fail to reflect the priority in the quarter, which is for a proactive approach to deliver a coherent heritage destination.
- CR15(iii) Policy to enhance the Reading Abbey Quarter as a high-quality visitor destination - PROPOSED OPTION This approach involves a new policy supporting the ongoing project and ensuring that development within the vicinity aligns with the overall vision and intent of the project. In doing so, it helps to fulfil the requirements in NPPF paragraph 126, and provides potentially vital policy backing to any works needed as part of the project.

4.77 Area to the North of Friar Street and East of Station Road (CR16)

4.77.1 Key Considerations

- The area covered by this policy is a 0.73 ha area in central Reading, immediately to the south east of Reading station. It comprises buildings on the eastern side of Station Road and the northern side of Friar Street between Station Road and Blagrave Street, including the Harris Arcade. It adjoins the London Street/St Mary's Butts Conservation Area and Reading Abbey Quarter to the east, and the Station/River Major Opportunity Area to the west and north, and is therefore strategically located between one of Reading's greatest concentrations of heritage assets and the location for the highest density mixed use development over the plan period, and also on the main route from the station to the Abbey Quarter heritage destination.
- Although this area does contain some listed buildings (Great Western House on Station Road and 11, 12, 13, 14 and 15 Friar Street), much of the remainder does not benefit from any specific protection. Some elements are more modern than they appear, with the Pitcher and Piano at 16-18 Friar Street being a 1950s construction. Nevertheless, the area as a whole makes a substantial contribution to the overall character of this part of the town centre, with each building having its own character and elements of interest. Of the undesignated buildings, the Pitcher and Piano and Yates' in particular present a high-quality frontage to the street. Meanwhile, the Victorian Harris Arcade plays a unique role in Reading in housing a significant number of small, independent shops, and is therefore an essential element of the diversity of central Reading.
- In consultation on the Draft Local Plan in early 2017, a site forming the largest part of this area (15-18 Friar Street, 2-16 Station Road and the Harris Arcade) was put forward for potential development, with a phased redevelopment and potential for additional height, mass and bulk. This site was subsequently considered through the HELAA process (reference AB097 in the November 2017 version, EV014 and EV015), which came to the conclusion that large scale redevelopment was not suitable due particularly to considerations on character. In short, although much of the site is not listed, it includes a number of high-quality buildings and frontages that make a significant positive contribution to the character of the centre of Reading.

• In order to set out the Council's position on the site in the event of redevelopment proposals being taken further, it was decided that a policy should highlight the importance of the area, in particular as a transition from the high density development around the station to the more sensitive heritage assets to the south east. The area identified to be covered extended further than the nominated site to include adjoining areas where the same circumstances apply.

4.77.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• CR16(i) No policy - REJECTED

This approach would fail to take the initiative on this site and set out Council expectations for how the area should be treated. This could lead to development proposals within the area which are not appropriate to the aspirations for the site, and which could be difficult to resist without a dedicated policy.

- CR16(ii) Conserve and enhance to protect character, no wholesale redevelopment but some conversion possible PROPOSED OPTION The proposed approach is to include a policy highlighting the importance of this area and setting out the Council's aspirations for its future, which includes preservation of its key elements, in particular the Harris Arcade and the frontages to the street. This is not to say that there is no scope for development within the site, but that it must be particularly careful to not result in the loss of the character of the site.
- CR16(iii) Redevelopment for offices/residential/retail REJECTED Even if it assumed that the listed elements would be retained and their setting respected, this approach would still result in a loss of an area that makes a significant contribution to the character of central Reading. There would be no guarantees that it could be replaced with developments of similar quality.

4.78 Island Road Major Opportunity Area (SR1)

4.78.1 *Key Considerations*

These sites were assessed through the HELAA process (EV014 and EV015), with the relevant references as follows:

- SR1a: Former Landfill, Island Road WH017, WH020, WH047
- SR1b: North of Island Road WH046
- SR1c: Island Road A33 frontage WH010

4.78.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

SR1: ISLAND ROAD MAJOR OPPORTUNITY AREA (Overall)

SR1(i)	No policy - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new industrial and warehouse space.
SR1(ii)	New policy identifying Island Road as major opportunity area for new business space - PROPOSED OPTION	Drawing these three sites together into a single policy enables a joined-up approach to be taken.
SR1(iii)	New policy identifying Island Road as major opportunity area for specific major residential development - REJECTED	This area is not appropriate for residential development, in particular due to contamination and the poor quality living environment that would be created.
SR1a: For	mer Landfill, Island Road	
SR1a(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new industrial and warehouse space.
SR1a(ii)	Employment development (B1c/B2/B8) - PROPOSED OPTION	Considered appropriate designation through HELAA.
SR1a(iii)	Residential development - REJECTED	This site is not appropriate for residential, in particular due to its location on the top of recent landfill, due in particular to contamination concerns. There would also be amenity effects from the sewage treatment works.
SR1a(iv)	Leisure development - REJECTED	This scale of leisure development would be likely to have a significant adverse impact on existing centres, and could potentially draw trade from some distance which may affect roads close to the SPA.
SR1a(v)	Offices - REJECTED	The needs for industrial and warehouse space are greater than those for offices and easier to meet. This site, in a primarily industrial/quasi-industrial location is better suited to industrial use.
SR1b: Noi	rth of Island Road	
SR1b(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new industrial and warehouse space.
SR1b(ii)	Employment development (B1/B2/B8) - PROPOSED OPTION	Considered appropriate designation through HELAA.
SR1b(iii)	Leisure development - REJECTED	This scale of leisure development would be likely to have a significant adverse impact on existing centres

SR1b(iv) SR1b(v)	Residential development (60-100 dwellings) - REJECTED Offices - REJECTED	Would be a very poor living environment, adjacent to sewage treatment works and industrial space and separated from other residential. The needs for industrial and warehouse space are greater than those for offices and easier to meet. This site, in a primarily industrial/quasi-industrial location is better suited to industrial
		use.
SR1c: Isla	and Road A33 Frontage	
SR1c(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new industrial and warehouse space.
SR1c(ii)	Mixed commercial uses excluding residential - PROPOSED OPTION	Considered appropriate designation through HELAA.
SR1c(iii)	Retail development - REJECTED	This scale of retail development would be likely to have a significant adverse impact on existing centres, and could potentially draw trade from some distance which may affect roads close to the SPA. The policy recognises the potential for more limited development subject to policy tests.
SR1c(iv)	Leisure development - REJECTED	This scale of leisure development would be likely to have a significant adverse impact on existing centres, and could potentially draw trade from some distance which may affect roads close to the SPA. The policy recognises the potential for more limited development subject to policy tests.
SR1c(v)	Residential development (270-506 dwellings) - REJECTED	Would be a very poor living environment, sandwiched between dual carriageway and sewage treatment works, separated from other residential.

4.79 Land North of Manor Farm Road Major Opportunity Area (SR2)

4.79.1 Key Considerations

This area was assessed through the HELAA process (EV014 and EV015) with the reference WH003.

4.79.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

SR2(i)No policy, do not allocate -
REJECTEDWould fail t
to help meet

Would fail to make use of a developable site to help meet needs and deliver wider benefits to South Reading.

SR2(ii)	Continue current policy SA2c (SDPD) allocation for housing - REJECTED	Represents an under-use of site in view of high level of needs for housing. Would not meet education needs arising.
SR2(iii)	Designate as core employment area - REJECTED	Site not considered to merit protection as CEA, as has less future prospects as employment land as set out in Employment Area Analysis.
SR2(iv)	New policy allocating for increased residential density and education provision - PROPOSED OPTION	Considered appropriate designation through HELAA.

4.80 South of Elgar Road Major Opportunity Area (SR3)

4.80.1 Key Considerations

This area was assessed through the HELAA process (EV014 and EV015), and the sites that make up the allocation are reference KA009, KA016, KA017 and KA029.

4.80.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

SR3(i)	No policy, do not allocate - REJECTED	Would fail to make use of a developable site to help meet needs and deliver wider benefits to South Reading.
SR3(II)	Designate as a core employment area - REJECTED	Much of the area is not in 'pure' employment use, with the Makro site at the centre a retail operation. Designating as a CEA would not therefore fulfil the purpose of the policy. Other parts of site assessed through Employment Area Analysis and considered suitable for release.
SR3(iii)	New policy encouraging residential development, with some potential for commercial uses - PROPOSED OPTION	Considered appropriate designation through HELAA.

4.81 Other Sites for Development in South Reading (SR4)

4.81.1 Key Considerations

These sites were assessed through the HELAA process (EV014 and EV015), with the relevant references as follows:

- SR4a: Pulleyn Park, Rose Kiln Lane MI010
- SR4b: Rear of 3-29 Newcastle Road RE010
- SR4c: 169-173 Basingstoke Road KA028
- SR4d: 16-18 Bennet Road WH045
- SR4e: Part of Former Berkshire Brewery Site WH002
- SR4f: Land South West of Junction 11 of the M4 WH022

4.81.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

SR4a: Pulleyn Park, Rose Kiln Lane				
SR4a(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.		
SR4a(ii)	Allocate for residential - PROPOSED OPTION	Considered appropriate designation through HELAA.		
SR4a(iii)	Retail - REJECTED	Site is in an out-of-centre location, and use for retail would not be in accordance with the sequential approach.		
SR4a(iv)	Offices - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices.		
SR4a(v)	Leisure use - REJECTED	Site is in an out-of-centre location, and use for retail would not be in accordance with the sequential approach.		
SR4b: Rea	ar of 3-29 Newcastle Road			
SR4b(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new housing.		
SR4b(ii)	Allocate for residential (18- 27 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.		
SR4b(iii)	Higher density residential (more than 40 dwellings) - REJECTED	Would be likely to have detrimental effect on character and residential amenity of the local area.		
SR4c: 169	9-173 Basingstoke Road			
SR4c(i)	Do not allocate - REJECTED	Would fail to make use of a potentially deliverable/developable site to help meet identified needs for new housing.		
SR4c(ii)	Residential (50-80 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.		
SR4c(iii)	Higher density residential (more than 100 dwellings) - REJECTED	Would be likely to have detrimental effect on character and residential amenity of the local area.		
SR4c(iv)	Retail or other commercial use (offices, industrial or warehouse) - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices or retail. Basingstoke Road represents a division between residential		

and employment for most of its length, and this is most appropriately used as a

housing site.

SR4d: 16-18 Bennet Road

SR4d(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new industrial and warehouse space.
SR4d(ii)	Employment development (B1/B2/B8) - PROPOSED OPTION	Considered appropriate designation through HELAA.
SR4d(iii)	Other commercial uses - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new industrial and warehouse space.
SR4d(iv)	Residential development - REJECTED	Site is within a Core Employment Area surrounded by employment uses, and this would have unacceptable effects on amenity of residents of any development.

SR4e: Part of Former Berkshire Brewery site

		5	
SR4e(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new industrial and warehouse space.	
SR4e(ii)	Employment development (B1/B2/B8) with some limited other commercial development - PROPOSED OPTION	Considered appropriate designation through HELAA.	
SR4e(iii)	Other non-residential development e.g. hotel - REJECTED	Would fail to make use of a deliverable/developable site to help meet identified needs for new industrial and warehouse space. Hotel would require compliance with sequential approach.	
SR4e(iv)	Residential development or mixed use - REJECTED	Site is within a Core Employment Area surrounded by employment uses, and this would have unacceptable effects on amenity of residents of any development.	
SR4f: Land South West of Junction 11 of the M4			
SR4f(i)	Do not allocate - REJECTED	This could result in a situation where major designations are brought forward in Wokingham and West Berkshire Local Plans, but this one corner of the site in	

SR4f(ii) Allocate for undetermined uses associated with possible major development in Grazeley - PROPOSED OPTION

4.82 Leisure and Recreation Use of the Kennetside Areas (SR5)

4.82.1 *Key Considerations*

- The Kennet Meadows, to the south west of Reading, form a major open area, important for flooding, biodiversity, landscape and recreation purposes, which brings the rural environment close to the centre of Reading. The towpath along the Kennet and Avon Canal is a major recreation route for pedestrians and cyclists, and it forms part of National Cycle Network route 4, linking Reading and Newbury.
- However, there are sites along parts of the canal where there is potential for enhancement of the area's leisure and recreation role. Fobney Mead comprises a laboratory and former fish farm, owned by the Environment Agency and now vacant, which was considered for development to meet the identified needs through the HELAA (site reference MI001, see EV014 and EV015), but excluded early on in the process as its location primarily in the functional flood plain precludes any development for the key needs such as housing and employment. The site forms an existing allocation in the Sites and Detailed Policies Document (SA10a, see PP006) for low-intensity leisure use associated with the open space or waterside environment, but no development has taken place since the document was adopted.
- The other site with potential for enhancement is an area between the A33 and canal, north of the Rose Kiln Lane bridge. This is an open, vegetated area, where there is very limited public access and is difficult to access in any case due to the generally wet ground conditions. The site is, again, in the functional floodplain, and also makes up part of a Local Wildlife Site. There have been historic proposals for a marina on this site, but this was some years ago and there have not been any applications for this, or any other development on this site.
- As set out in section 4.20 in support of policy EN11 on Waterspaces, there is a need to promote multi-functional use of the waterside environment, in terms of achieving the Reading 2050 Vision aspiration of a 'City of Rivers and Parks' (OP009), and also the consultation on the Thames Waterways Plan in promoting, protecting and enhancing the use of the river for recreation. These sites represent substantial opportunities to help to achieve these aims, through low-intensity recreation uses without substantial built-form. However, the sites are heavily constrained, particularly by the functional floodplain as well as the wildlife significance, and allocation for a specific development would need substantial justification which would need to be dealt with on a case-by-case basis.

4.82.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

- SR5(i) No policy REJECTED
 - This approach would leave any proposals to be considered on their merits. Although there are existing applicable policies, such as EN11, EN12 and EN18 that would be likely to prevent this causing particular issues, it would be more helpful to highlight the opportunities and issues in a single policy.
 - SR5(ii) Business as usual, SA10a SDPD (just Fobney Mead) REJECTED

This approach would continue the existing Fobney Mead allocation in the SDPD. This would fail to present a more holistic approach to this part of the river. Inclusion as an allocation rather than a criteria-based policy also creates an expectation of development without any known prospect of delivery in the plan period.

 SR5(iii) New policy including land north and east of Rose Kiln Ln – PROPOSED OPTION
 A policy which sets the expectations for any proposals for low-intensity leisure and recreation use is appropriate, without pecessarily making a formal

and recreation use is appropriate, without necessarily making a formal development allocation, as the latter would still require substantial and detailed justification, in particular in terms of its flood risk and biodiversity implications.

4.83 Dee Park (WR1)

4.83.1 Key Considerations

- This area was assessed through the HELAA process (EV014 and EV015) with the reference NO001.
- In brief, this is a major regeneration of a run-down estate in West Reading, where there were opportunities to both replace dilapidated housing and realise a net gain in residential units, alongside a major improvement to the overall environment and new supporting facilities including a replacement primary school. This is a joint project between the Council and a private sector partner. Phases 1 and 2 are now completed, and have delivered a net gain of almost 250 new homes. The last phase, which could see a net gain of around 100 dwellings, was permitted under the outline 2009 permission, but reserved matters have yet to be submitted. For this reason, it is considered necessary for the policy to remain in place to provide a basis for considering reserved matters or any variation to the approved outline.

4.83.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• WR1(i) No policy - REJECTED

Whilst much of the development has already been completed, this would remove the policy for the area at a time when the final reserved matters (or any revised full application) for the last phases have not yet been submitted, so could lead to a policy gap.

• WR1(ii) Continue policy SA4 (SDPD) - PROPOSED OPTION This approach would carry forward the existing approach from the Sites and Detailed Policies Document, which reflects the existing outline permission for the site. The development that has resulted is a significant improvement on the area, and has been popular, and the approach should therefore be continued.

4.84 Park Lane Primary School, The Laurels and Downing Road (WR2)

4.84.1 Key Considerations

This area was assessed through the HELAA process with the reference TI001.

- This area was assessed through the HELAA process with the reference TI001.
- One of the key considerations not available at the time of the HELAA was the Playing Pitches Strategy (EV023), which has looked specifically at this site in terms of whether the Downing Road playing field is surplus to requirements. A Draft Strategy was available at March 2018, and its conclusions on this site are as follows.

"The current school playing field at Downing Road is not used for community clubs for sport and there is no identified school use. Due to the need for improvements to youth 11 v 11 pitches currently and in the future, if these playing fields are to be developed, there will be a requirement for mitigation to improve facilities within the area."

There is therefore considered to be a reasonable prospect of replacement facilities being provided, which would enable the site to be released for development.

4.84.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• WR2(i) Do not allocate - REJECTED

The likelihood is that if the sites are not allocated and developed in accordance with the policy, they will continue in their current operation as an unsatisfactory federation of separate, dispersed sites forming part of a single school. If Park Lane School is merged, the Downing Road Playing fields will become redundant. If nothing is done, this area of open space will become unused and overgrown. It could become an eyesore and a magnet for antisocial behaviour. It would remain as a 'green lung' within the built up area but would not be available for use by the public. In reality, the single school site proposal will not be realised unless the Downing Road site is sold for residential and open space use.

 WR2(ii) Continue current allocation to re-provide school, develop remaining sites - PROPOSED OPTION

This approach would carry forward the existing allocation of the area (policy SA5 of the Sites and Detailed Policies Document, PP006), which was considered and found sound by the Inspector in relation to that document, subject to the introduction of wording to require justification for loss of the playing field in terms of national policy. The Playing Pitches Strategy has now considered this, and this is considered capable of mitigation. At this stage, there is no expectation of this proposal being implemented in the short term, but it remains an important aspiration.

Implementation of the proposed policy will significantly improve the efficient and effective operation of the local primary school in serving its local community. While the Downing Road Playing Field currently provides a green space in this area, the site is not publicly available and is a good location for development in view of its proximity to access to transport, services and employment.

 WR2(iii) Develop school on the Laurels without using Downing Road -REJECTED

It is not considered that this proposal is deliverable, and, as set out above, this will simply lead to the Downing Road site becoming redundant and neglected.

 WR2(iv) Development including town centre use on Park Lane site -REJECTED

In broad policy terms, the principle of 'centre' uses on sites adjacent to smaller centres would generally be supported. However, in this case, the Council would like to see important elements of the existing building retained wherever possible, and it is unlikely that retail and related uses on the ground floor could achieve this, as the current building is not obviously suited to shopfronts.

4.85 Other Sites for Development in West Reading (WR3)

4.85.1 Key Considerations

These sites were assessed through the HELAA process (EV014 and EV015), with the relevant references as follows:

- WR3a: Former Cox and Wyman Site, Cardiff Road AB055
- WR3b: 2 Ross Road and Part of Meadow Road AB063 (part) and AB093
- WR3c: 28-30 Richfield Avenue AB073
- WR3e: Yeomanry House, Castle Hill MI018
- WR3f: 4 Berkeley Avenue MI012
- WR3g: 211-221 Oxford Road, 10 and rear of 8 Prospect Street BA001
- WR3h: Rear of 303-315 Oxford Road BA002
- WR3i: Part of Former Battle Hospital, Portman Road BA003
- WR3j: Land at Moulsford Mews BA004
- WR3k: 784-794 Oxford Road KE001
- WR3I: 816 Oxford Road KE018
- WR3m: 103 Dee Road NO009
- WR3n: Amethyst Lane SO008
- WR3o: The Meadway Centre, Honey End Lane NO002
- WR3p: Alice Burrows Home, Dwyer Road SO003
- WR3q: Norcot Community Centre, Lyndhurst Road KE019
- WR3r: Charters Car Sales, Oxford Road KE010
- WR3s: Land at Kentwood Hill KE008 (part)
- WR3t: Land at Armour Hill KE008 (part)

4.85.2 *Policy Options*

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

WR3a: Former Cox and Wyman Site, Cardiff Road

WR3a(i) Do not allocate - REJECTED Would fail to make use of a deliverable/developable site to help meet needs for housing

WR3a(ii)	Redevelopment for residential use (70-110 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
WR3a(iii)	Employment uses - REJECTED	Site considered as part of Employment Area Analysis and considered to have limited future for employment. New development would have negative effect on residential amenity.
WR3a(iv)	Retail and leisure uses - REJECTED	Site is not in an identified centre, and development on this scale would likely to negatively affect existing centres. Vehicle access for a retail/leisure use of this scale is also inadequate.

WR3b: 2 Ross Road and Part of Meadow Road

WR3b(i)	Do not allocate - REJECTED	Would fail to make use of a potentially deliverable/developable site to help meet needs for housing.
WR3b(ii)	Allocate for residential (40- 60 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
WR3b(iii)	Higher density residential (over 80 dwellings) - REJECTED	Would be likely to have a detrimental effect on character and residential amenity of local area.
WR3b(iv)	Offices - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices.
WR3b(v)	Leisure/retail - REJECTED	Site is not in an identified centre, and this would not be in accordance with locational strategy. No likelihood of implementation.
WR3c: 28-30	0 Richfield Avenue	
WR3c(i)	Do not allocate - REJECTED	Would fail to make use of a potentially deliverable/developable site to help meet needs for housing.
WR3c(ii)	More mixed commercial - REJECTED	Would fail to make use of a potentially deliverable/developable site to help meet needs for housing.
WR3c(iii)	Residential development (50-80 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
WR3d: Rive	rmead Leisure Centre, Richfie	eld Avenue
WR3d(i)	Do not allocate - REJECTED	Would fail to make use of a

integ(i)		deliverable/developable site to help meet identified needs for new swimming provision.
WR3d(ii)	Additional leisure development - PROPOSED OPTION	This would help to deliver a much- needed new pool for Reading, which in turn allows the release of Central Pool for housing.

WR3d(iii)	Commercial (office, warehouse or industrial) - REJECTED	This would be poorly located in relation to the rest of the employment area, would be more likely to have a detrimental effect on landscape of the meadows, and would not help to meet the needs for swimming.	
WR3d(iv)	Residential - REJECTED	This would be removed from existing residential, would be in a site at risk of flooding, and would not help to meet the needs for swimming.	
WR3e: Yeo	manry House, Castle Hill		
WR3e(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing.	
WR3e(ii)	Residential (10-14 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.	
WR3e(iii)	Offices - REJECTED	Assuming that this involves re-use rather than redevelopment of listed building, the office use is existing and requires no permission.	
WR3e(iv)	Retail/restaurant - PROPOSED OPTION	This is considered an appropriate alternative designation which would help to safeguard the future of the building.	
WR3f: 4 Be	rkeley Avenue		
WR3f(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing.	
WR3f(ii)	Residential (10-14 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.	
WR3f(iii)	Higher density residential - REJECTED	Would be likely to have a detrimental effect on character and residential amenity of local area.	
WR3f(iv)	Offices/Retail - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices or retail.	
WR3g: 211-221 Oxford Road, 10 and rear of 8 Prospect Street			
WR3g(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing	
WR3g(ii)	Residential development with district centre uses on ground floor - PROPOSED OPTION	Considered appropriate designation through HELAA.	
WR3g(iii)	Development for residential only - REJECTED	Would fail to take opportunities available for expanding and consolidating the district centre.	

WR3g(iv)	Development for offices with ground floor district centre uses - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices.
WR3h: Reai	r of 303-315 Oxford Road	
WR3h(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing
WR3h(ii)	Comprehensive development for residential (14-20 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
WR3h(iii)	Development for commercial - REJECTED	Commercial use likely to have an adverse effect on residential amenity being located directly behind residential properties.
WR3h(iv)	Development for mixed use residential and commercial - REJECTED	Commercial use likely to have an adverse effect on residential amenity being located directly behind residential properties.
WR3h(v)	Development for retail - REJECTED	Site is on edge of district centre, but is tucked away behind residential and unlikely to be sufficiently prominent to be deliverable for retail.
WR3h(vi)	Development for community/leisure - REJECTED	Community use could potentially be acceptable. However, no firm proposals or indication that this is deliverable. Leisure use not appropriate for same reasons as retail above.
WR3i: Part of Former Battle Hospital, Portman Road		

WR3i(i) Do not allocate - REJECTED Would fail to make use of a deliverable/developable site to help meet needs for housing WR3i(ii) Development for residential Considered appropriate designation use (160-240 dwellings) through HELAA. PROPOSED OPTION Mixed use development WR3i(iii) Site is close to Core Employment Area. (commercial and However, the Portman Road provides a residential) - REJECTED clear division between the residential and employment elements, with WR3i(iv) Industrial and commercial landscaping in between, and the site is development - REJECTED therefore more appropriately used for residential.

WR3j: Land at Moulsford Mews

WR3j(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing
WR3j(ii)	Residential (10-16 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.

WR3j(iii)	Higher density residential - REJECTED	Would be likely to have a detrimental effect on character and residential amenity of local area.
WR3j(iv)	Commercial (offices and retail) - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices.
WR3j(v)	Mixed use (ground floor retail./office and upper floors residential) - REJECTED	Would fail to make most efficient use of a deliverable/developable site to help meet needs for housing. Site is not sufficiently prominent to likely be deliverable for retail.
WR3k: 784-	794 Oxford Road	
WR3k(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing
WR3k(ii)	Development for residential (14-22 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
WR3k(iii)	Development for commercial - REJECTED	Would fail to make use of a potentially deliverable/developable site to help meet needs for housing
WR3k(iv)	Development for mixed use including residential - REJECTED	Would fail to make optimal use of a potentially deliverable/developable site to help meet needs for housing, and no clear needs for an additional use.
WR3k(v)	Development for retail - REJECTED	Site is outside district centre, and not in accordance with strategy for location of retail.
WR3k(vi)	Development for community use - REJECTED	Community use could potentially be acceptable. However, no firm proposals or indication that this is deliverable.
WR3I: 816 (Oxford Road	
WR3I(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing
WR3I(ii)	Development for residential (13-20 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
WR3I(iii)	Development for commercial - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing
WR3I(iv)	Development for mixed use including residential - REJECTED	Would fail to make optimal use of a deliverable/developable site to help meet needs for housing, and no clear needs for an additional use.
WR3I(v)	Development for retail - REJECTED	Site is outside district centre, and not in accordance with strategy for location of retail.

WR3I(vi)	Development for community use - REJECTED	Community use could potentially be acceptable. However, no firm proposals or indication that this is deliverable.
WR3m: 103	Dee Road	
WR3m(i)	Do not allocate - REJECTED	Would fail to make use of a potentially deliverable/developable site to help meet needs for housing
WR3m(ii)	Residential (34-50 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
WR3m(iii)	Retained fire service/community uses - PROPOSED OPTION	This would continue the existing use with new provision, and would therefore be acceptable.
WR3m(iv)	Higher density residential development - REJECTED	Would be likely to have a detrimental effect on character and residential amenity of local area.
WR3m(v)	Retail development - REJECTED	Site is outside district centre, and not in accordance with strategy for location of retail.
WR3n: Ame	thyst Lane	
WR3n(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing
WR3n(ii)	Residential (32-48 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
WR3n(iii)	Higher density residential - REJECTED	Would be likely to have a detrimental effect on character and residential amenity of local area.
WR3n(iv)	Commercial (offices or retail) - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices.
WR3n(v)	Community or leisure use - REJECTED	Community use could potentially be acceptable. However, no firm proposals or indication that this is deliverable. Leisure use not appropriate as not located in accordance with strategy.
WR3o: The	Meadway Centre, Honey End	Lane
WR30(i)	Do not allocate - REJECTED	Would not address the decline of this centre, and its current issues in fulfilling its district centre role, physical quality and potential for improvement.
WR3o(ii)	Develop as district centre - PROPOSED OPTION	Considered appropriate designation through HELAA.

WR3o(iii)	Residential - REJECTED	Would fail to take the opportunities available for substantially strengthening this district centre to secure its future.
WR3o(iv)	Offices - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market.
WR3p: Alice	e Burrows Home, Dwyer Road	
WR3p(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing
WR3p(ii)	Development for residential and/or residential care (18- 27 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
WR3p(iii)	Commercial development - REJECTED	Site is in a wholly residential area, and commercial use would be likely to have adverse effects on residential amenity, whilst also failing to meet the most pressing housing needs.
WR3p(iv)	Leisure or community use - REJECTED	Community use could potentially be acceptable as it reflects existing use. However, no firm proposals or indication that this is deliverable.
WR3q: Nord	cot Community Centre, Lyndh	urst Road
WR3q(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing
WR3q(ii)	Residential (13-20 dwellings) with replacement community uses - PROPOSED OPTION	Considered appropriate designation through HELAA.
WR3q(iii)	Higher density residential (more than 40 dwellings) - REJECTED	Would be likely to have a detrimental effect on character and residential amenity of local area.
WR3q(iv)	Commercial (offices or retail) - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices.
WR3r: Char	ters Car Sales, Oxford Road	
WR3r(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing.
WR3r(ii)	Residential (12-18 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
WR3r(iii)	Higher density residential (more than 30 dwellings) - REJECTED	Would be likely to have a detrimental effect on character of local area.

WR3r(iv)	Commercial (offices or retail) - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with
		overall strategy for offices.

WR3s: Land at Kentwood Hill

- REJECTED

REJECTED

WR3s(iii)

WR3s(iv)

WR3s(v)

housing (200-250 dwellings)

Develop entire area except

for the recreation ground -

Only develop previously

developed areas (11-17

dwellings) - REJECTED

Develop land fronting

(41-62 dwellings) - PROPOSED OPTION

Kentwood Hill for housing

WR3s(i)	Do not change allocation, retain as open space - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing
WR3s(ii)	Develop the whole area for	Would lead to a very significant loss of

Would lead to a very significant loss of open space, including much needed recreation ground.

This was considered a piecemeal solution and rejected by SDPD Inspector. Would fail to make optimal contribution to meeting housing needs.

Would lead to a very significant loss of open space, including popular and well-used allotments which provide recreation, food growing and outdoor space for people.

Considered appropriate designation through HELAA.

WR3t: Land at Armour Hill

WR3t(i-ii) as WR3s(i-ii) above

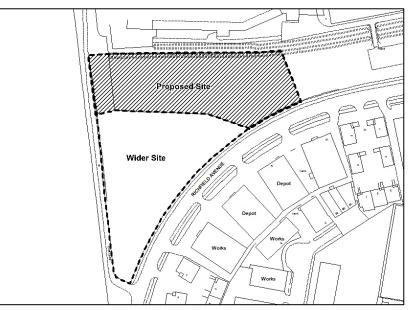
WR3t(iii)	Develop entire area except for allotments - REJECTED	Would lead to loss of parking and access to allotments, which would affect their long-term viability.
WR3t(iv)	Develop land fronting Armour Hill for housing (12- 18 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.

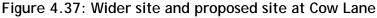
4.86 Potential Traveller Transit Site at Cow Lane (WR4)

4.86.1 Key Considerations

- As set out in section 4.44, the assessment of needs for gypsy and traveller provision within the Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment (EV016, 2017) led to an identified needs for a transit site for gypsies and travellers that could accommodate five pitches. A single transit pitch usually accommodates two caravans, so this would mean space for ten caravans.
- The site assessment work that resulted from the identification of needs, described in section 4.44 and set out in detail in the Gypsy and Traveller Provision Background Document (EV019), considered the potential for sites to meet both permanent and transit needs, and resulted in the identification of one site, at the junction of Cow Lane and Richfield Avenue, as having potential for traveller transit needs.

- The site originally assessed (the 'wider site') is a triangle of land in Council ownership, which is largely unused for most of the year, but which is used at the time of the adjacent Reading Festival for a variety of purposes. The site is largely hardstanding and grassed areas, but includes some trees and shrubs. It is currently accessed from Cow Lane, which joins Richfield Avenue at the southern end of the site. The Richfield Avenue core employment area is immediately to the south and south east, comprising a mix of industrial, warehouse, office and other commercial uses including leisure and retail. A new garden centre has recently opened immediately to the east, whilst the Rivermead Leisure Centre is nearby to the north east. To the north is a former golf driving range, which is now vacant. To the west are open areas and agricultural land, used in August for the Reading Festival, and to the south west are railway facilities constructed as part of the recent improvements to Reading Station. The site is close to the town centre, around 1 km north west of Reading station, and the closest residential dwellings are around 500m away. It is a site which has previously been subject to incursions by travellers.
- Parts of the site are at risk of flooding, with the site divided between Flood Zones 2 and 3. During the site assessment process, this led to the reduction of the site from the 1.47 ha of the 'wider site', to the 0.73 ha of the proposed site (which is what is shown on the Proposals Map), as the NPPF is clear that development involving caravans will not be acceptable within Flood Zone 3. The proposed site excludes almost all of the Flood Zone 3 area of the site, whilst largely following a natural line of vegetation within the site. The site passed the sequential test, unsurprisingly given the lack of any other potentially suitable site within Reading as demonstrated in the Gypsy and Traveller Provision Background Document. As part of applying the Exception Test (EV028), required for sites involving caravans in Flood Zone 2, a Level 2 Strategic Flood Risk Assessment for the site was undertaken (EV027). It concluded that it is feasible that the site could be developed safely and in accordance with the requirements of the NPPF to mitigate the potential risks of these sources of flooding, subject to provision of a Flood Management and Evacuation Plan and implementation of a number of design recommendations, including the need to ensure that pitches would be located outside Flood Zone 3.





- The site was subject to public consultation within the Gypsy and Traveller Provision Consultation Document (EV017), in September and October 2017. It resulted in 165 responses, the vast majority of which were objections. The main concerns related to crime and anti-social behaviour, the cost to taxpayers, the effect on the Festival and surrounding businesses, traffic, landscape effects, flood risk, noise, biodiversity effects, and maintaining public rights of way at Cow Lane. Festival Republic, the operators of the Festival, made strong objections to the proposal due to the importance of the land for the operation, and there were also objections from the Council's parks and leisure section. A summary of the responses received makes up part of the evidence base for the Local Plan (EV018).
- Following the consultation, the Council has yet to make a decision on whether to move forward with establishing a transit site in this location, and if it is decided to proceed, there would still need to be work on identifying funding, putting together a proposal and making a planning application. Therefore, at the point at which the Local Plan is drafted, there is no certainty that this proposal will go ahead, and this will need to be reflected in any policy.

4.86.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• WR4(i) No policy - REJECTED

This approach would mean that there are no proposals in the Local Plan for meeting the identified transit needs. This would be likely to continue to mean significant levels of unauthorised encampments on locations across Reading (and within the Reading urban area in adjoining authorities), and would mean more limited police powers for enforcing against encampments than would be the case were a transit site provided.

• WR4(ii) Traveller transit site - PROPOSED OPTION

There is a clear need for transit provision within Reading, and this is the only site that has been identified as having potential to provide it. Whilst the Council is still exploring whether this proposal can be carried forward, there is a need for a policy to identify the potential and to set out the key considerations for dealing with such a proposal, including the operation of the Festival, flood risk (including ensuring no pitches within Flood Zone 3) and effects on the nearby area.

• WR4(iii) Residential - REJECTED

This site would not be an appropriate location for permanent residential, as the character of the area is primarily industrial in nature, which would cause effects on permanent residents. Permanent residential would be isolated from other residential areas. The Festival issue raised in relation to the transit site would also apply here, and may be even more of a concern given that permanent structures would remove any possibility of a temporary annual use by the Festival and would likely result in complaints from future residents. Most of these comments apply equally to permanent pitches for gypsies and travellers.

• WR4(iv) Offices/leisure/retail - REJECTED A commercial use would be likely to fit in better to the local area than a permanent residential use would, but some of the comments in relation to WR4(iii) continue to apply, in particular the creation of significant permanent structures that would eliminate any possibility of future temporary festival use.

4.87 Sites for Development and Change of Use in Caversham and Emmer Green (CA1)

4.87.1 Key Considerations

These sites were assessed through the HELAA process (EV014 and EV015), with the relevant references as follows:

- CA1a: Reading University Boat Club, Thames Promenade CA006
- CA1b: Part of Reading Golf Course, Kidmore End Road PE002
- CA1c: Land at Lowfield Road PE001
- CA1d: Rear of 200-214 Henley Road, 12-24 All Hallows Road and 4, 7 & 8 Copse Avenue – PE003
- CA1e: Rear of 13-14a Hawthorne Road and 282-292 Henley Road PE004
- CA1f: Rear of 1 & 3 Woodcote Road and 21 St Peters Hill TH004

It is worth noting that, since the consultation on the Pre-Submission Draft Local Plan closed, Reading Golf Club have consulted their members on potential aspirations to release the entire golf course, which spans the Reading-South Oxfordshire boundary, for development. This is not an option that had been formally submitted to the Council, either before or since. However, this information then became public and has led to a significant number of representations to the Council after the Pre-Submission consultation closed and prior to submission. These are not considered 'duly-made', but an appendix to the Statement of Consultation on the Pre-Submission Draft Local Plan (LP006) details the main points raised and the number of representations. The points made were largely raised within the 'duly made' representations on this site in any case.

4.87.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

CA1a: Reading University Boat Club, Thames Promenade

CA1a(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing
CA1a(ii)	Residential development only in Flood Zone 2 (16-25 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
CA1a(iii)	Higher density residential (over 40 dwellings) - REJECTED	Would likely require use of land for residential in Flood Zone 3.
CA1a(iv)	Leisure uses associated with meadows - REJECTED	This could potentially be acceptable as it reflects existing use. However, no firm proposals or indication that this is deliverable. Would not help to meet residential needs.

CA1b: Part of Reading Golf Course, Kidmore End Road

CA1b(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing
CA1b(ii)	Residential development and new golf clubhouse (90- 130 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
CA1b(iii)	Expanded residential development on the entire golf course - REJECTED	This would result in a very large residential development, having significant effects on infrastructure (transport and education), which even if capable of mitigation would require significant investment to be in place, would need full agreement with SODC, within which much of the golf course is located, lead to a loss of a leisure facility.
CA1b(iv)	New clubhouse only - REJECTED	Not considered likely to be deliverable, and would not make any contribution to meeting housing needs.
CA1c: Laı	nd at Lowfield Road	
CA1c(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing
CA1c(ii)	Development for residential (24-36 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
CA1c(iii)	Cemetery use - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing
CA1d: Re Copse Av		2-24 All Hallows Road and 4, 7 and 8
CA1d(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing
CA1d(ii)	Residential development (17-25 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
CA1d(iii)	Only develop gardens behind homes on All Hallows Road (northern part) - REJECTED	Would not help to create a comprehensive development that makes an optimal contribution to meeting needs.
CA1d(iv)	Only develop gardens behind homes on Henley Road (southern part) - REJECTED	Would not help to create a comprehensive development that makes an optimal contribution to meeting needs.

CA1e: Rear of 13-14a Hawthorne Road and 282-292 Henley Road

CA1e(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing
CA1e(ii)	Residential development (9- 13 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
CA1e(iii)	Higher density residential (more than 20 dwellings) - REJECTED	Would be likely to lead to detrimental effects in terms of character and residential amenity.

CA1f: Rear of 1 & 3 Woodcote Road and 21 St Peters Hill

CA1f(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing
CA1f(ii)	Residential development (8- 12 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
CA1f(iii)	Higher density residential (over 20 dwellings) - REJECTED	Would be likely to lead to detrimental effects in terms of character and residential amenity.

CA1g: Land West of Henley Road Cemetery

CA1g(i)	Do not allocate - REJECTED	Would not help to meet identified needs for cemetery extension.
CA1g(ii)	Cemetery extension - PROPOSED OPTION	Would help to meet the identified need for extension of the cemetery without involving the loss of potential housing land.
CA1g(iii)	Residential development - REJECTED	Would result in a loss of open land required for other uses.
CA1g(iv)	Higher density residential development - REJECTED	Would result in a loss of open land required for other uses.

4.88 Caversham Park (CA2)

4.88.1 *Key Considerations*

This area was assessed through the HELAA process (EV014 and EV015) with the reference PE009.

4.88.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

CA2(i) No policy - REJECTED This approach would not be appropriate, as it would leave a major site which is known to be likely to be available over the plan period without any policy steer.

- CA2(ii) Conversion to 40-45 dwellings with public access REJECTED This approach recognises that this major and historic site is becoming available for conversion and/or development. A beneficial use for the main listed manor building needs to be secured, and the policy should clarify that a range of uses consistent with its heritage can be considered. Some development on parts of the brownfield elements of the site may also be appropriate. However, the site is a registered historic park, together with a number of other constraints, and any proposal that results in development of all or part of it will need to be accompanied by convincing justification in line with national and local policy. This justification has not been provided.
- CA2(iii) Conversion plus residential development for more dwellings -REJECTED

This would result in loss of all or part of a historic park and garden for development. As set out above, this would mean potentially serious harm to the significance of this asset, as well as listed structures within the park. There are also other constraints such as biodiversity and landscape. Any identification for residential would need to be supported by convincing justification in line with national and local policy. This justification has not been provided.

• CA2(iv) No residential development, open to public access - REJECTED The deliverability of any public access to the site would be expected to be tied to at least some re-use of the building, for residential or another use. This is not therefore considered to be deliverable.

4.89 Sites for Development in East Reading (ER1)

4.89.1 Key Considerations

These sites were assessed through the HELAA process, with the relevant references as follows:

- ER1a: The Woodley Arms PH, Waldeck Street KA011
- ER1b: Dingley House, 3-5 Craven Road RE016
- ER1c: Land rear of 8-26 Redlands Road RE014
- ER1d: Land adjacent to 40 Redlands Road RE015
- ER1e: St Patrick's Hall, Northcourt Avenue CH006
- ER1f: Hamilton Centre, Bulmershe Road PA008
- ER1g: Alexander House, Kings Road PA006
- ER1h: Arthur Hill Swimming Pool, 221-225 Kings Road PA004
- ER1i: 261-265 London Road PA001
- ER1j: Palmer Park Stadium Area PA005
- ER1k: 131 Wokingham Road PA007

4.89.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

ER1a: The Woodley Arms PH, Waldeck Street

ERTU: The		
ER1a(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/ developable site to help meet needs for housing or student accommodation
ER1a(ii)	Residential development (with potential for 26-38 bedspaces or equivalent residential) - PROPOSED OPTION	Considered appropriate designation through HELAA.
ER1a(iii)	Development for commercial - REJECTED	Site is not an established commercial area and there would be likely detrimental effects on residential amenity.
ER1a(iv)	Development for mixed use including residential - REJECTED	Not considered that a mixed use scheme is deliverable, and would also fail to maximise contribution to meeting needs.
ER1a(v)	Development for retail - REJECTED	Site is not within a designated centre and would be likely to fail sequential approach, and option not expected to be capable of delivery.
ER1b: Ding	ley House, 3-5 Craven Road	
ER1b(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing
ER1b(ii)	Change of use to residential (15-22 dwellings) with limited additional development - PROPOSED OPTION	Considered appropriate designation through HELAA.
ER1b(iii)	Redevelopment for residential - REJECTED	Would result in the loss of a locally- listed building, protected by Article 4 direction.
ER1b(iv)	Development for offices - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices.
ER1b(v)	Development for community use - REJECTED	If locally-listed building were to be retained, this could potentially be acceptable. However, no firm proposals or indication that this is deliverable. Would not help to meet residential needs.

ER1c: Land rear of 8-26 Redlands Road

ER1c(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing
ER1c(ii)	Residential development (12-18 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
ER1c(iii)	Higher density residential development (over 30 dwellings) - REJECTED	Would be likely to detrimentally affect character of conservation area, in particular through loss of large, mature trees.
ER1c(iv)	Redevelop the entire site for residential - REJECTED	Would be likely to detrimentally affect character of conservation area, in particular through loss of large, mature trees.
ER1d: Land	adjacent to 40 Redlands Roa	ad
ER1d(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing.
ER1d(ii)	Residential development (23-35 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.

Less dense residential (15-Would fail to make most efficient use 22 dwellings) - REJECTED of a deliverable/developable site to meet needs for housing.

This could potentially be acceptable as it reflects existing use. However, no community use - REJECTED firm proposals or indication that this is deliverable. Would not help to meet residential needs.

ER1e: St Patrick's Hall, Northcourt Avenue

Development for

ER1d(iii)

ER1d(iv)

ER1e(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help direct student accommodation to existing sites in line with policy H12.
ER1e(ii)	Intensify student accommodation while retaining locally listed building - PROPOSED OPTION	Considered appropriate designation through HELAA.
ER1e(iii)	Intensify student accommodation with loss of locally listed building - REJECTED	This would result in the loss of the locally-listed building, which is not considered to be acceptable.

ER1f: Hamilton Centre, Bulmershe Road

ER1f(i)	Do not allocate - REJECTED	Would fail to make use of a
		deliverable/developable site to help
		meet needs for housing.

ER1f(ii)	Residential development (13-19 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
ER1f(iii)	Higher density residential development (over 30 dwellings) - REJECTED	Would potentially have an adverse effect on the character of the local area.
ER1f(iv)	Redevelop for community use - REJECTED	This could potentially be acceptable as it reflects existing use. However, no firm proposals or indication that this is deliverable. Would not help to meet

residential needs.

ER1g: Alexander House, Kings Road

ER1g(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing.
ER1g(ii)	Residential development (26-38 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
ER1g(iii)	Higher density residential development (over 50 dwellings) - REJECTED	Would potentially have an adverse effect on the character of the local area.
ER1g(iv)	Development for offices - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices.

ER1h: Arthur Hill Swimming Pool, 221-225 Kings Road

ER1h(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing.
ER1h(ii)	Residential development (6-10 dwellings) - PROPOSED OPTION	Considered appropriate designation through HELAA.
ER1h(iii)	Higher density residential development (over 20 units) - REJECTED	This would either lead to a loss of, or have a detrimental effect on the frontage of the locally listed building.
ER1h(iv)	Office development - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices.
ER1h(v)	Ground floor district centre uses and upper floors residential - REJECTED	District centre use (other than existing use) more likely to have a detrimental effect on the character of the listed building.
ER1h(vi)	Ground floor district centre uses and upper floors offices - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing. See also comments about offices above.

ER1i: 261-275 London Road

ER1i(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing.
ER1i(ii)	Residential development (10-16 dwellings) with district centre uses on the ground floor - PROPOSED OPTION	Considered appropriate designation through HELAA.
ER1i(iii)	Residential only - REJECTED	Would fail to take opportunities available for expanding and consolidating the district centre.
ER1i(iv)	Ground floor district centre uses and upper floors offices - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices.
ER1i(v)	Office development - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices.
ER1j: Palm	er Park Stadium Area	
ER1j(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for new leisure provision.
ER1j(ii)	Allocate for new leisure development (swimming pool) - PROPOSED OPTION	Considered appropriate designation through HELAA.
ER1k: 131	Wokingham Road	
ER1k(i)	Do not allocate - REJECTED	Would fail to make use of a deliverable/developable site to help meet needs for housing.
ER1k(ii)	Residential development - REJECTED	Would fail to take opportunities available for expanding and consolidating the centre.
ER1k(iii)	Office development - REJECTED	The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices.
ER1k(iv)	Ground floor local centre uses and residential on upper floors (8-12 dwellings) - PROPOSED	Considered appropriate designation through HELAA.

OPTION

ER1k(v) Ground floor local centre uses and offices on upper floors - REJECTED The need for additional offices is already met, and this is not a location where there is likely to be a market. Would not be in accordance with overall strategy for offices.

4.90 Whiteknights Campus, University of Reading (ER2)

- 4.90.1 Key Considerations
 - The University of Reading was founded in 1926, and plays a major role in the life and economy of Reading. It is ranked within the top 200 universities in the world, and has around 17,000 students and 4,000 staff.
 - The University operates from two campuses, and a number of other buildings, within Reading. The original campus, at London Road, still contains a number of University functions, but the main campus is now at Whiteknights. This campus is just over 120ha in area and is located in the south-east of Reading, spanning the boundary of Reading and Wokingham. Around two thirds of this campus is within Wokingham Borough, and the boundary passes through a number of buildings on the campus. Figure 4.38 below shows the whole extent of the campus together with the Borough boundary. Whiteknights Park itself has history predating the University as a large estate outside Reading (see Figure 4.1 of the Local Plan), which also covered some adjoining areas including the current site of the adjacent Leighton Park School.
 - Whiteknights Campus does include a number of constraints. There are 12 listed buildings on site, and a number of Conservation Areas in close proximity on the Reading side of the boundary. There are lakes, woodlands and open areas on campus, a number of which have wildlife significance, some as identified Local Wildlife Sites and others in terms of providing areas of Biodiversity Action Plan habitat. Although in private ownership, the site is accessible to the public and is used for recreation by surrounding residents. The surrounding areas are mostly residential, with Victorian terraced housing around the north, and more modern suburban areas around the south.
 - As would be expected with a major institution, there will continue to be development and change within the campus to meet needs. In 2008 the University published a Whiteknights Campus Development Plan (WCDP). This is to provide contextual background to individual planning applications and to "...underpin the planned capital construction programme for the period 2008-2012". The largest investment set out in the WCDP was the redevelopment (replacement) of a number of Halls of Residence. This forms one of a number of key developments, including a hotel and ICMA expansion and Business Centre. The ICMA expansion and halls of residence have been completed, whilst the construction of the hotel has not taken place. Although the WCDP draws together these key developments, it is intended to set out a flexible framework within which new academic, operational and welfare buildings and facilities will be provided. It identifies key measures within the context of 14 key themes. These themes include:
 - To rationalise the number of peripheral vehicle entry/exit points;
 - To revitalise the internal movement and parking strategy;
 - Enhance the connection between the two districts;
 - To reinforce the campus square as the hub of student facilities;

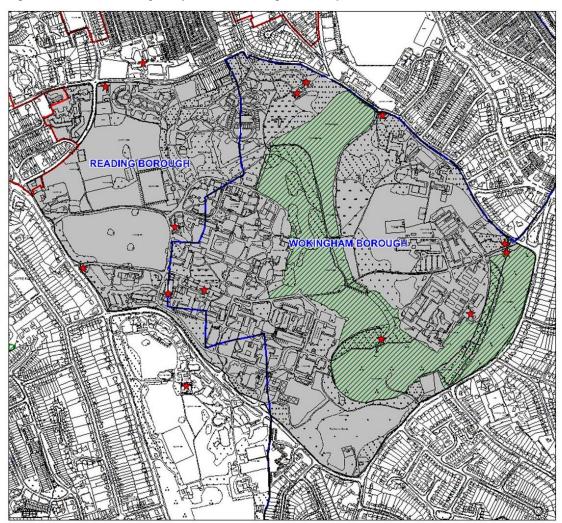
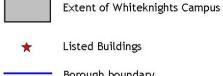


Figure 4.38: Summary map of Whiteknights Campus

KEY



Listed Buildings

Borough boundary

Conservation area



Local Wildlife Site

(NB: This does not include the additional areas of significance such as BAP habitats that make up part of EN12)

- To create a new entry management arrangement for visitors;
- To improve exterior public realm;
- To provide for a new Film, Theatre and Television department building;
- To facilitate the efficient collection, sorting and disposal of waste and recyclables;
- To deliver an integrated catering strategy;
- To facilitate a stronger academic, research and business quarter at Earley Gate;
- To replace and upgrade the halls of residence;

- To enhance and extend sports and recreation provision and facilities within the Campus;
- To create a Zoning Strategy to guide investment and protect environmental assets;
- To deliver physical development projects using sustainable construction techniques to maximise energy efficiencies.
- Whilst the period of the WCDP has now finished, it still provides a useful wider context to the overall approach to the campus. A number of physical development projects are ongoing under the banner of '2026: TRANSFORM', more information on which is set out on the University's website⁵².
- There is an existing policy SA6 within the Sites and Detailed Policies Document (PP005) on the Whiteknights Campus, which has been used to guide recent applications on the campus over recent years. There is also an equivalent policy TB14 in Wokingham's Managing Development Delivery Local Plan (adopted 2014), the wording for which is almost identical to Reading's policy with the exception of one additional criterion on heritage. There is therefore an aligned approach between the two authorities that cover the campus in existing policy, and discussions with Wokingham have not indicated any intention to substantively change the overall approach.

4.90.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

ER2(i) No policy - REJECTED This option would not provide any direction to guide development proposals that will inevitably arise during the plan period as the University seeks to develop to meet its most up to date needs. This approach would also not be in accordance with the policy approach for the part of the campus within Wokingham.

ER2(ii) Continue with current policy (SDPD SA6) - PROPOSED OPTION This option would largely continue the current approach, which has been applied to recent developments on the campus and which is consistent acro

applied to recent developments on the campus and which is consistent across the campus in both Wokingham and Reading. This supports the continued development of the campus, subject to some key considerations such as wildlife and residential amenity. However, the policy also needs to be updated to reflect the policy approach on student accommodation in H12, and the discussion set out in section 4.43 of this paper. The issues caused by student accommodation set out in that section means that it will need to be a key consideration when determining applications that would mean increasing accommodation needs, and the preference established in H12 is for on-campus accommodation or expansion of existing provision.

⁵² <u>http://www.reading.ac.uk/about/2026-transform.aspx</u>

4.91 Royal Berkshire Hospital (ER3)

4.91.1 Key Considerations

- The Royal Berkshire Hospital on London Road, Reading, is the main hospital site for the Royal Berkshire NHS Foundation Trust, and employs around 4,000 people and provides over 800 hospital beds. The core catchment area covers around a population of around 500,000 in Reading, Wokingham, West Berkshire and surrounding areas, and also provides specialist services such as cancer treatment, dialysis and eye surgery to a wider area covering other parts of Berkshire, and parts of Oxfordshire and Hampshire. As such, it is a significant institution which draws people from a wide area.
- The man hospital complex occupies a site of around 8 ha, to the south east of central Reading. The site is quite intensely developed, and rises to around seven storeys in places. The most visible frontage, to London Road, which is no longer the main entrance, is Grade II listed, with the main block dating from 1839 and the flanking wings from 1865. The rest of the site is more recent, with the most recent additions dating from within the last ten years. There are a number of further listed buildings, as well as a locally-listed building, in the mainly Victorian areas surrounding the hospital.
- The Council has held meetings with the RBH Foundation Trust to discuss issues • around the site, particularly in February 2017. The Trust has two main concerns. Firstly, there is the need for flexibility for the site to continue to develop to meet needs for the provision of care, and the type of physical accommodation needed can change relatively quickly as healthcare technologies also change. Whilst the population of the catchment will increase, technology changes mean that this does not necessarily translate into a need for additional floorspace. More specifically, the Trust are concerned that the listed building on the site is no longer suited to modern healthcare needs, and is more suited to an administration or office function. The second main concern, which is shared by local residents, is car parking. Finding a parking space on site can be challenging, and has historically led to significant amounts of on-street parking in surrounding streets, where there is also pressure related to the University. The Council introduced a Hospital and University Parking Scheme to address these impacts, involving resident's permits and on-street pay and display, but also seeks to encourage journeys to the hospital by public transport.
- Paragraph 70 of the NPPF states that policies and decisions should "ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community".

4.91.2 Policy Options

The following options have been considered and have been subject to Sustainability Appraisal. Where rejected, the reasons are summarised below.

• ER3(i) No policy - REJECTED

This option would not provide any direction to guide development proposals that will inevitably arise during the plan period as the hospital seeks to modernise to meet its needs, and would not therefore follow the approach of the NPPF.

• ER3(ii) No policy - PROPOSED OPTION

A policy is needed which provides general support for on-site development to meet changing healthcare needs, but which also highlights the key planning constraints affecting the site, in particular the need to take account of the considerable heritage significance, and the need to adequately address parking issues.

APPENDIX 1: LIST OF SUBMISSION EVIDENCE DOCUMENTS

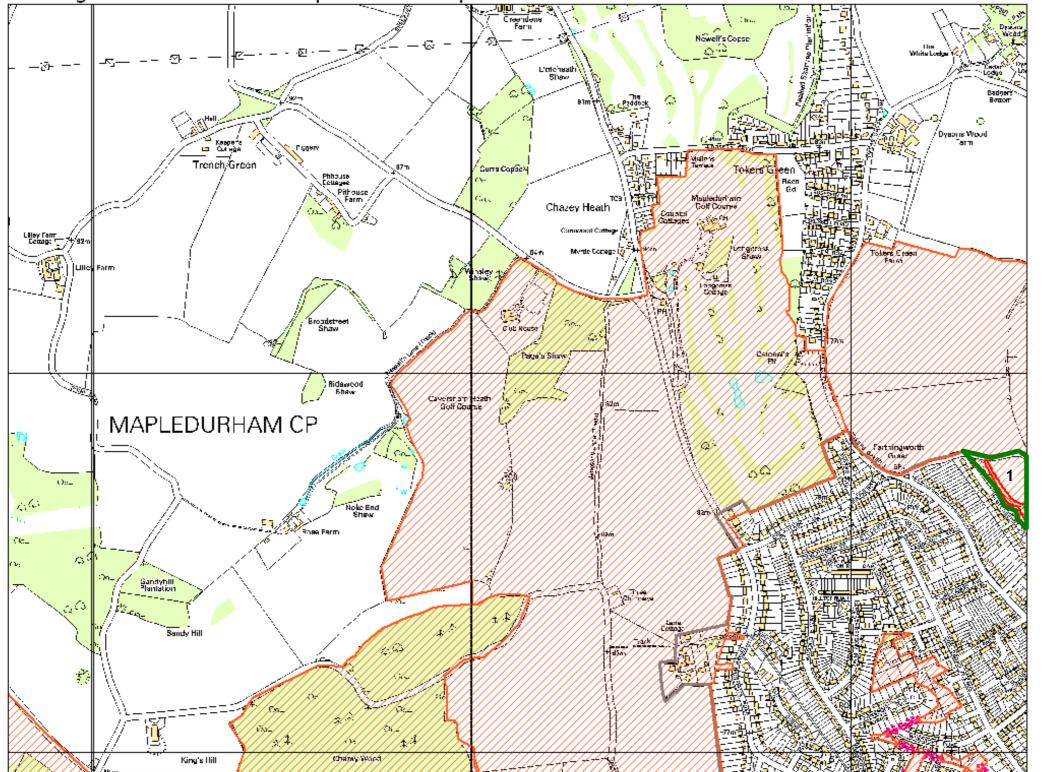
Please note that this is correct at submission (29/03/2017) and more documents may be added as the Examination progresses.

Ref	Document	Date
Local Plan Documents		
LP001	Submission Local Plan	March 2018
LP002	Submission Local Plan Proposals Map	March 2018
LP003	Pre-Submission Draft Local Plan	November 2017
LP004	Pre-Submission Draft Local Plan Proposals Map	November 2017
LP005	Sustainability Appraisal of the Pre-Submission Draft Local Plan	November 2017
LP006	Statement of Consultation on Pre-Submission Draft Local Plan	March 2018
LP007	Full copy of representations on Pre-Submission Local Plan	January 2018
LP008	Schedule of Minor Changes before Submission	March 2018
LP009	Draft Local Plan	May 2017
LP010	Draft Local Plan Proposals Map	May 2017
LP011	Sustainability Appraisal of the Draft Local Plan	May 2017
LP012	Statement of Consultation on Draft Local Plan	November 2017
LP013	Local Plan Issues and Options	January 2016
LP014	Sustainability Appraisal of the Local Plan Issues and Options	January 2016
LP015	Consultation Statement on Local Plan Issues and Options	May 2016
LP016	List of responses to representations on Local Plan Issues and Options	May 2017
	Planning Policy Documents	·
PP001	Local Development Scheme	November 2016
PP002	Statement of Community Involvement	March 2014
PP003	Sustainability Appraisal Scoping Report	September 2014
PP004	Core Strategy	January 2008, altered January 2015
PP005	Reading Central Area Action Plan	January 2009
PP006	Sites and Detailed Policies Document	October 2012, altered January 2015
PP007	Local Development Framework Proposals Map	October 2012
PP008	Duty to Co-operate Scoping Strategy	December 2015
PP009	Community Infrastructure Levy Charging Schedule	January 2015
PP010	Annual Monitoring Report 2016-17	December 2017
PP011	Parking Standards and Design SPD	October 2011
PP012	Reading Station Area Framework	December 2010
PP013	Community Infrastructure Levy Regulation 123 List	April 2014
	Other Plans, Policies and Strategies	
OP001	National Planning Policy Framework	2012
OP002	Planning Policy for Traveller Sites	August 2015
OP003	Thames Valley Berkshire Strategic Economic Plan 2015/16-2020/21: Strategy	2014
OP004	West of Berkshire Spatial Planning Framework	December 2016
OP005	Local Transport Plan 2011-2026	April 2011

OP006	Cycling Strategy 2014	March 2014
OP007	Reading Means Business on Climate Change: Reading's Climate Change Strategy 2013-2020	September 2013
OP008	Air Quality Action Plan Update	2016
OP009	Reading 2050 Vision	October 2017
	Evidence Documents	
EV001	Duty to Co-operate Statement	November 2017
EV002	Local Plan Overall Background Paper	March 2018
EV003	Self-Assessment Legal Compliance Toolkit of the Local Plan	March 2018
EV004	Self-Assessment Soundness Toolkit of the Local Plan	March 2018
EV005	Local Plan Transport Modelling Assessment	March 2018
EV006	Local Plan Viability Testing Report	March 2018
EV007	Infrastructure Delivery Plan	November 2017
EV008	Berkshire Functional Economic Market Area Study	February 2016
EV009	Central Berkshire FEMA Economic Development Needs Assessment	October 2016
EV010	Reading Employment Area Analysis	March 2018
EV011	Berkshire (including South Bucks) Strategic Housing Market Assessment	February 2016
EV012	Housing Implementation Strategy	December 2017
EV013	Berkshire Housing and Economic Land Availability Assessment Methodology	November 2016
EV014	Housing and Economic Land Availability Assessment Vol I Main Report	November 2017
EV015	Housing and Economic Land Availability Assessment Vol II Detailed Tables	November 2017
EV016	Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment	September 2017
EV017	Gypsy and Traveller Provision Consultation Document	September 2017
EV018	Gypsy and Traveller Consultation Summary of Responses	March 2018
EV019	Gypsy and Traveller Provision Background Document	September 2017
EV020	Western Berkshire Retail and Commercial Leisure Assessment	May 2017
EV021	Open Spaces Strategy	2007
EV022	Open Spaces Strategy Update Note	January 2018
EV023	Playing Pitches Strategy (Draft)	March 2018
EV024	Historic Environment Background Paper	March 2018
EV025	Strategic Flood Risk Assessment (Level 1)	June 2017
EV026	Strategic Flood Risk Assessment (Level 2)	December 2017
EV027	Strategic Flood Risk Assessment - Level 2 - Cow Lane	February 2018
EV028	Sequential and Exception Test Document	March 2018
EV029	Water Quality Assessment	March 2018
EV030	Tall Buildings Strategy	January 2008
EV031	Tall Buildings Strategy Update Note	March 2018
EV032	City Centre Framework Update 2008	January 2008
EV033	Local Green Space and Public Open Space Background Paper	March 2018
EV034	Western Berkshire OAN Sensitivity Testing	March 2018

APPENDIX 2: 2009 GREEN NETWORK PROJECT WITH UPDATES

Reading Green network - Map 1 North Mapledurham



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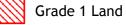
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Whole site now a Local Wildlife Site in Grade 1

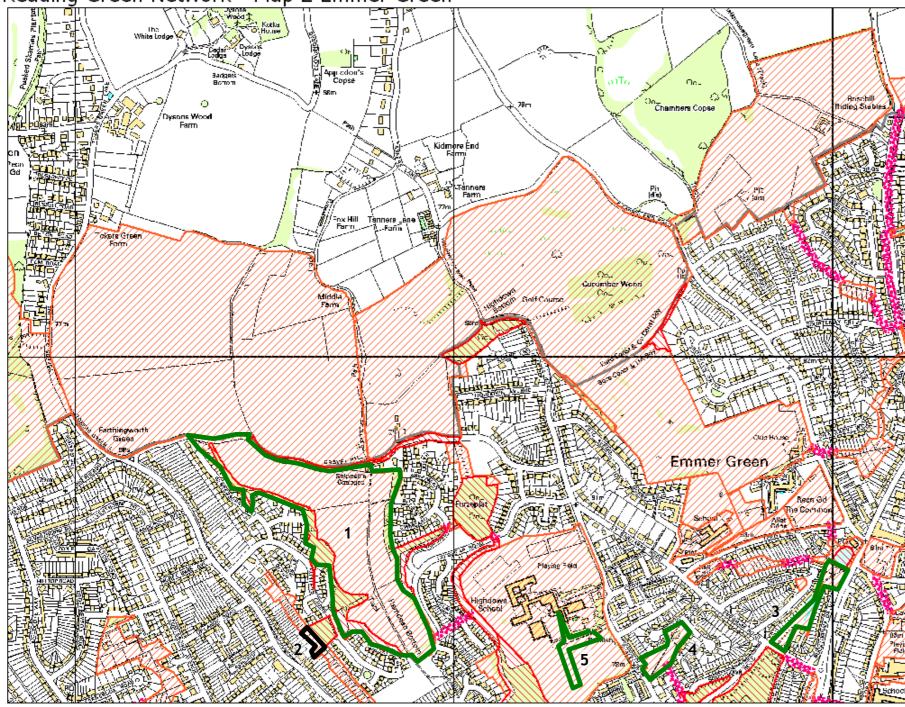
1.

KEY - 2009 TVERC work



- Grade 2 Land
- Potential Green Link
- KEY 2018 updated information
 - Development of Grade 1 or Grade 2 Land
- - Upgrade to Grade 1
 - Downgrade from Grade 1

Reading Green Network - Map 2 Emmer Green



- 1.
- 2. Site developed for residential
- 3. Site now considered BAP priority habitat under Grade 1
 - Site now considered BAP priority habitat under Grade 1

4.

5.

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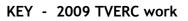
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Whole site now a Local Wildlife Site in Grade 1

Site now considered BAP priority habitat under Grade 1





- Grade 2 Land
- Potential Green Link

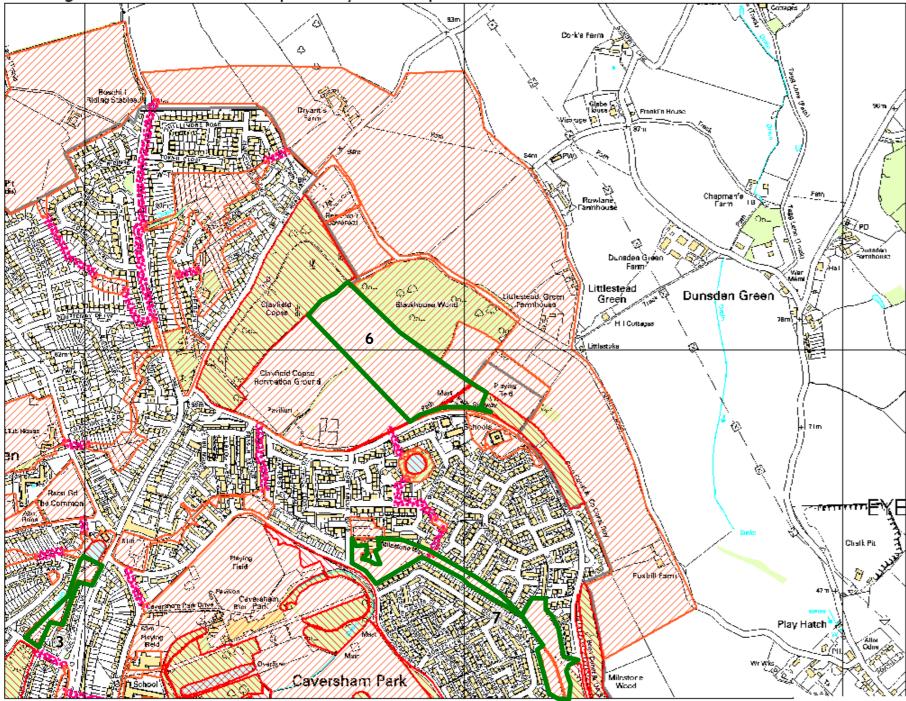
KEY - 2018 updated information





- Upgrade to Grade 1
- Downgrade from Grade 1

Reading Green Network - Map 3 Clayfield Copse



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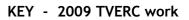
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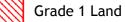
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7.

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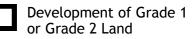
Site now considered BAP priority habitat under Grade 1 Site now considered BAP priority habitat under Grade 1 Site now considered BAP priority habitat under Grade 1

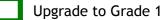




- Grade 2 Land
- Potential Green Link

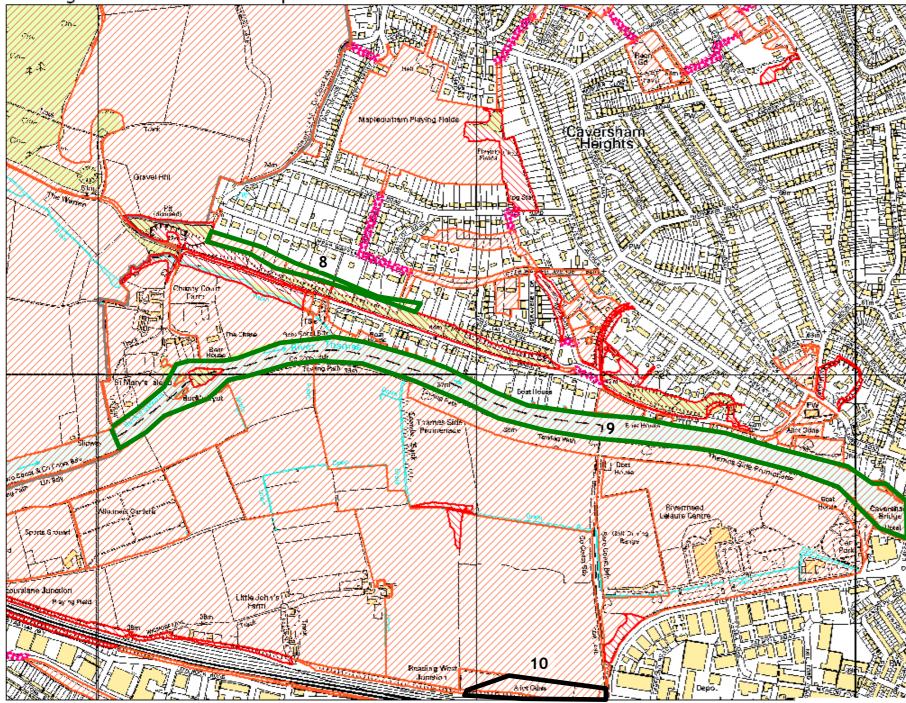
KEY - 2018 updated information





- 15
- Downgrade from Grade 1

Reading Green Network - Map 4 The Warren



- 8.
- 9.

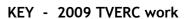
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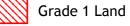
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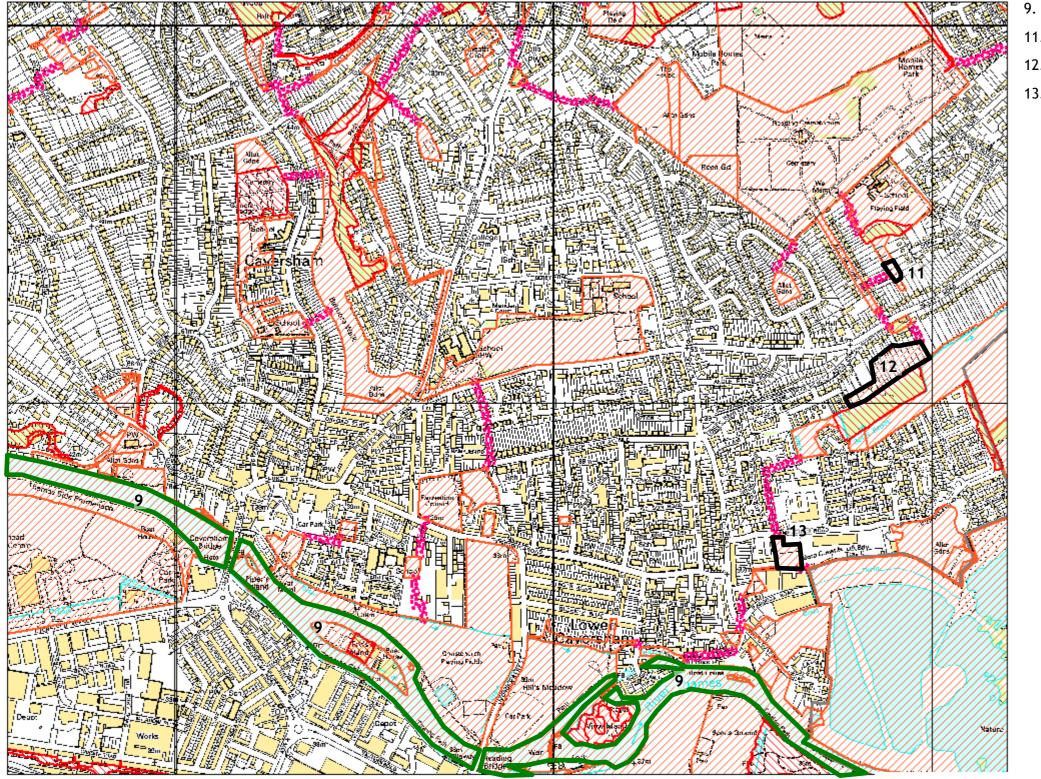
Site now considered BAP priority habitat under Grade 1 River considered BAP priority habitat under Grade 1 10. Site developed for railway uses as part of station scheme





- Grade 2 Land
- Potential Green Link
- KEY 2018 updated information
 - Development of Grade 1 or Grade 2 Land
- Upgrade to Grade 1
 - Downgrade from Grade 1

Reading Green Network - Map 5 Caversham



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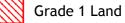


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River considered BAP priority habitat under Grade 1

- 11. Site developed for residential
- 12. Site developed for residential
- 13. Site developed for residential, albeit with some element of link through the site





- Grade 2 Land
- Potential Green Link

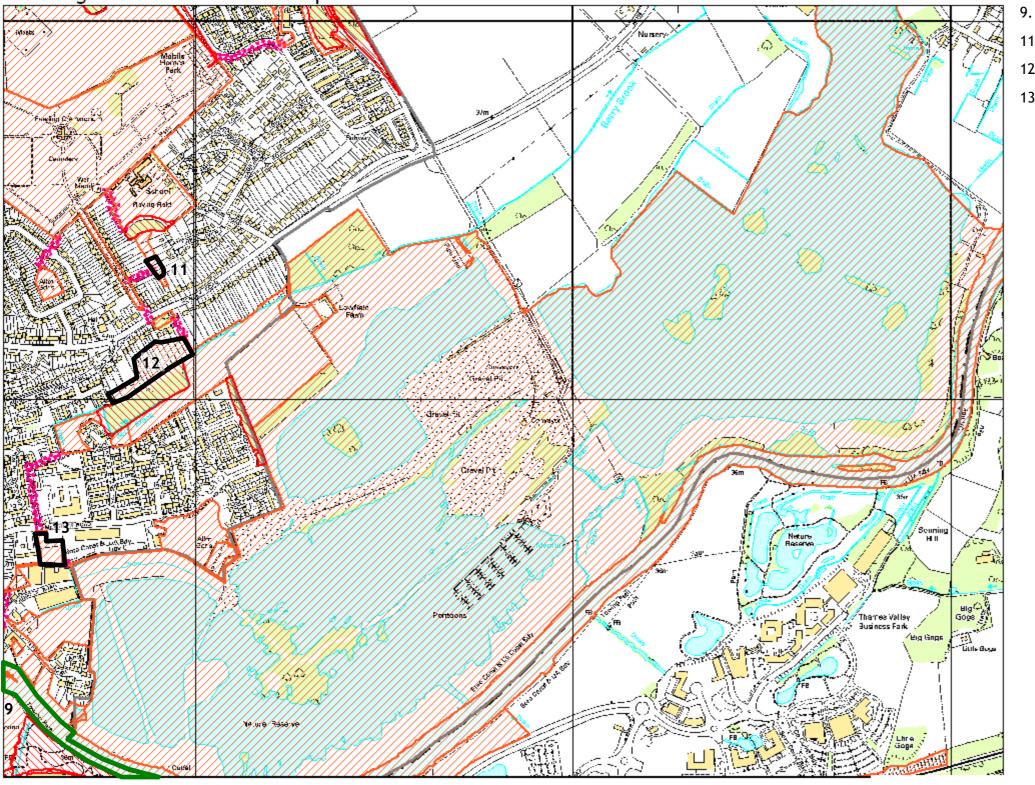
KEY - 2018 updated information





- Upgrade to Grade 1
- Downgrade from Grade 1

Reading Green Network - Map 6 Caversham Marina



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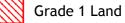
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River considered BAP priority habitat under Grade 1

- 11. Site developed for residential
- 12. Site developed for residential
- 13. Site developed for residential, albeit with some element of link through the site

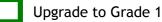




- Grade 2 Land
- Potential Green Link

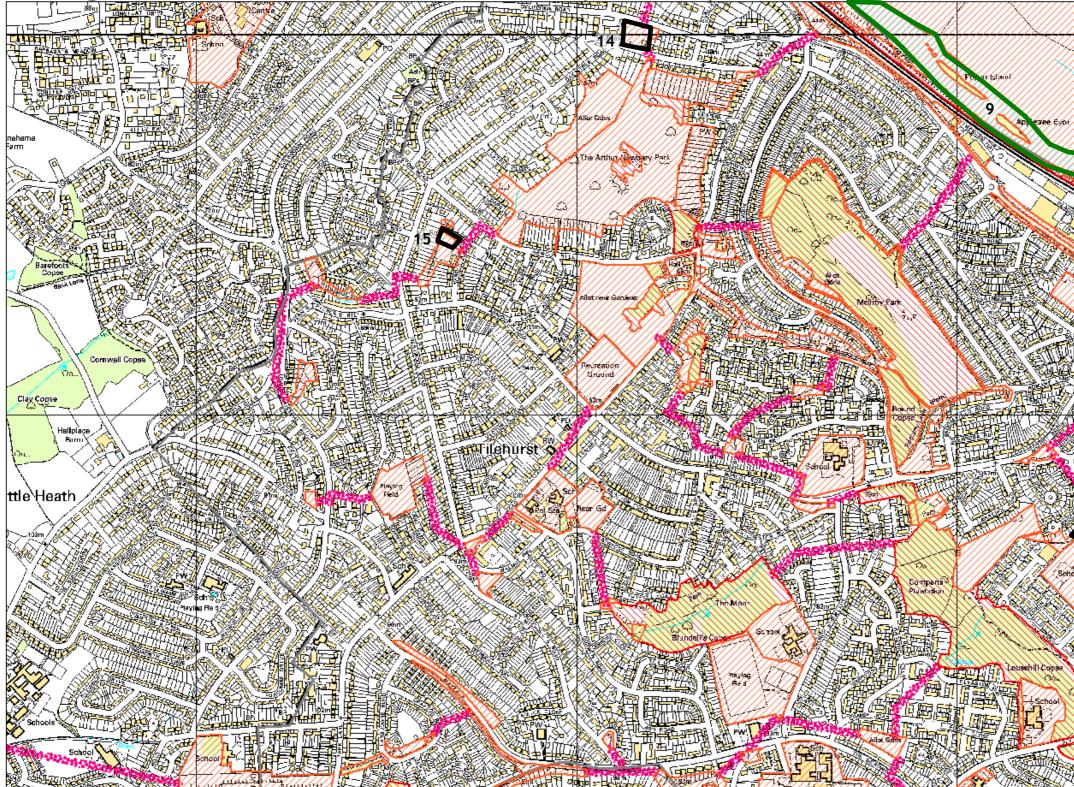
KEY - 2018 updated information





Downgrade from Grade 1





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- 9. River considered BAP priority habitat under Grade 1
- 14. Site developed for residential, albeit with some element of link through the site
- 15. Site developed for residential
- 16. Site developed for residential

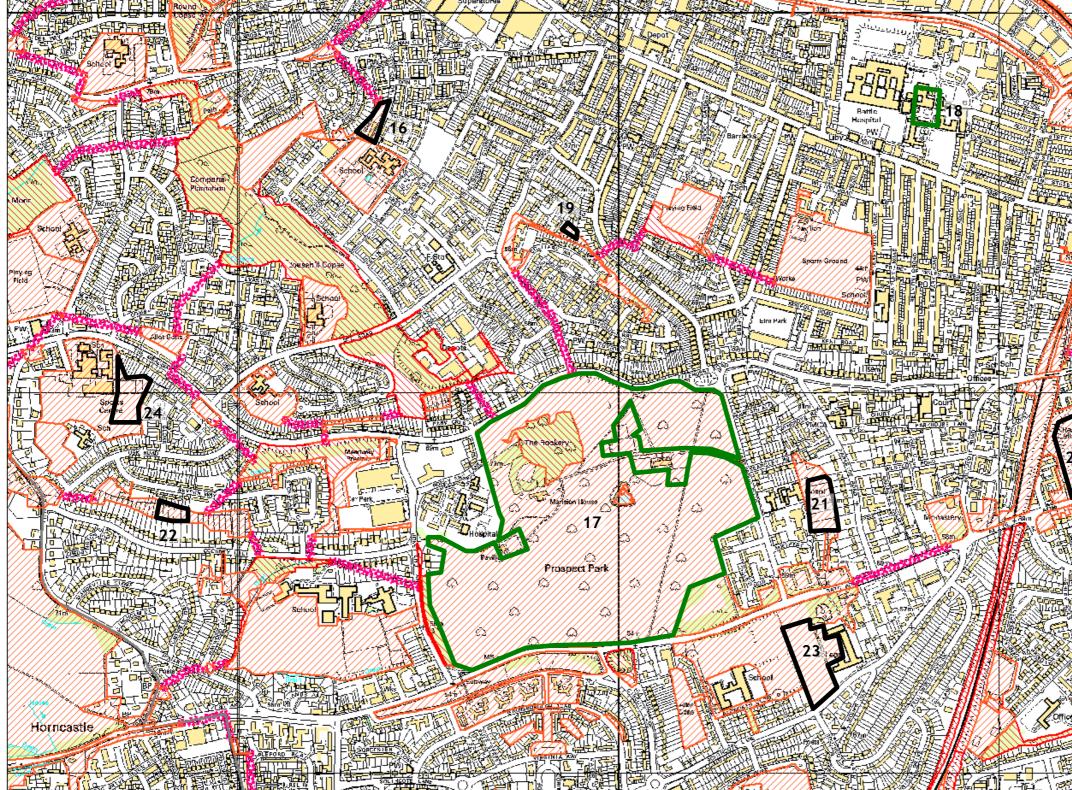


- Potential Green Link
- KEY 2018 updated information



- Development of Grade 1 or Grade 2 Land
- Upgrade to Grade 1
- Downgrade from Grade 1





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scale 1: 8000





- 16. Site developed for residential
- 17. Most of park now considered BAP priority habitat under Grade 1
- New park provided, which would qualify as Grade 2
- 19. Site developed for residential
- 20. Site developed for residential, leaving wildlife area along western boundary
- 21. Site developed for residential
- 22. Site developed for residential
- 23. Under construction for residential and school
- 24. Under construction for residential

	Grade 1 Land
	Grade 2 Land
828	Potential Green Link

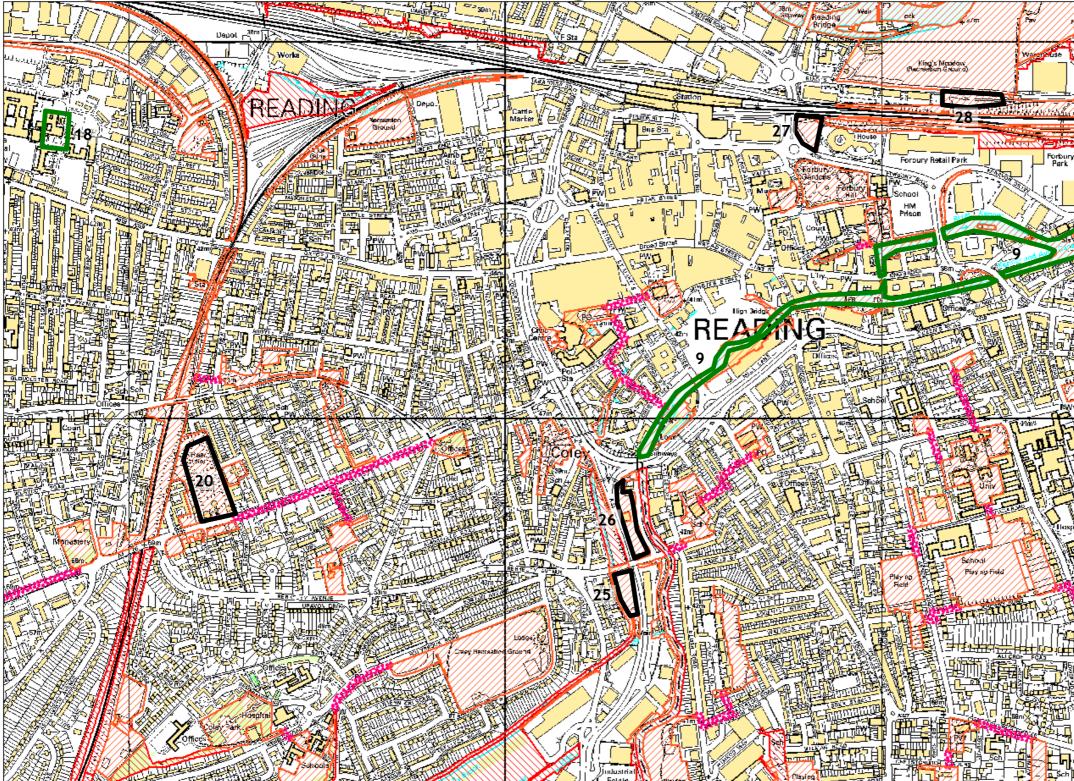
KEY - 2009 TVERC work

KEY - 2018 updated information



- Development of Grade 1 or Grade 2 Land
- Upgrade to Grade 1
- Downgrade from Grade 1

Reading Green Network - Map 9 Central Reading



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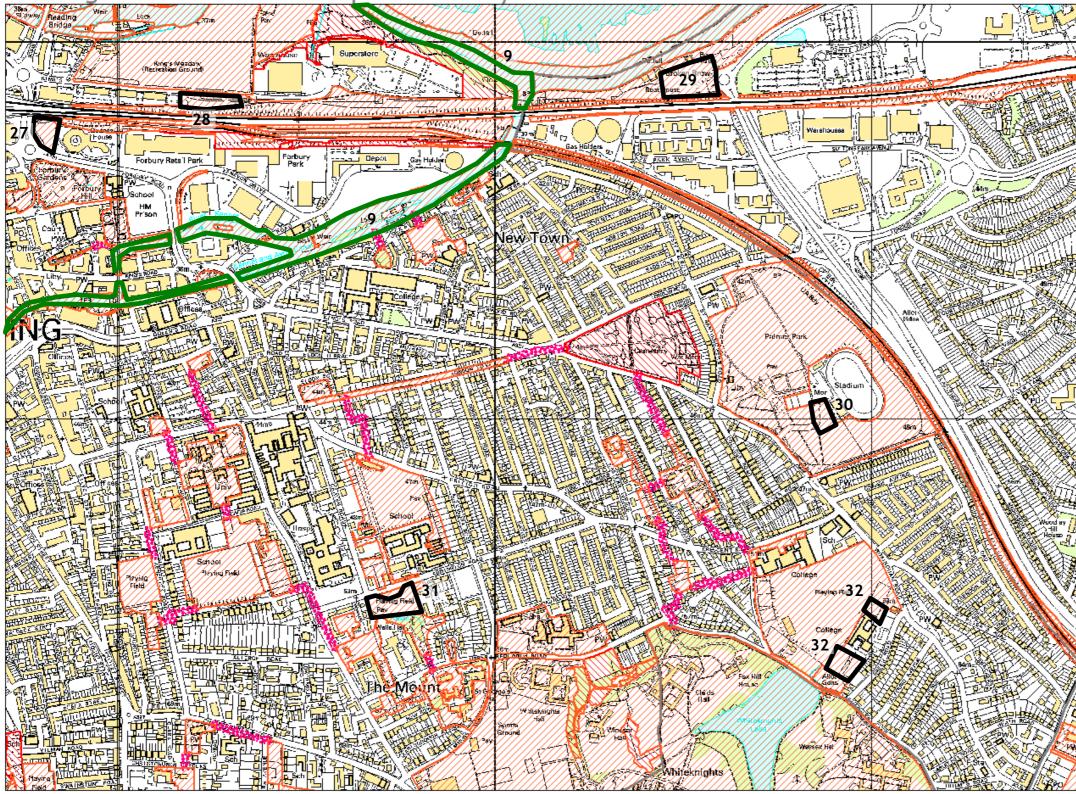


- 9. River considered BAP priority habitat under Grade 1
- New park provided, which would qualify as Grade 2
- 20. Site developed for residential, leaving wildlife area along western boundary
- 25. Site developed for warehouse
- 26. Site developed for residential
- 27. Site developed for offices
- 28. Site developed for railway uses as part of station scheme

KEY -	2009 TVERC work
	Grade 1 Land
	Grade 2 Land
1888 18	Potential Green Link
KEY -	2018 updated information
	Development of Grade 1 or Grade 2 Land

- Upgrade to Grade 1
- Downgrade from Grade 1

Reading Green Network - Map 10 Cemetry Junction

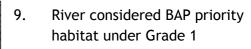


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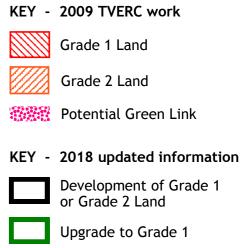
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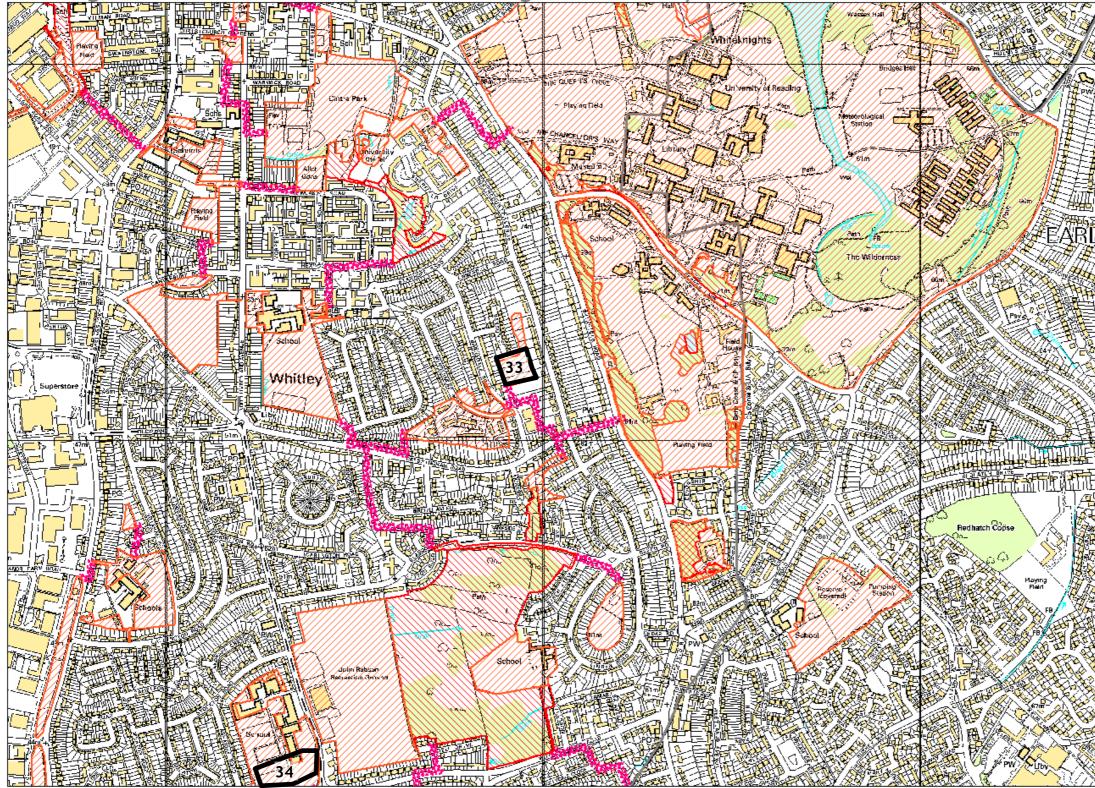
- 27. Site developed for offices
- 28. Site developed for railway uses as part of station scheme
- 29. Park and ride under construction
- 30. Now part of car park
- 31. Site developed for residential
- 32. Site developed for residential



501 100

Downgrade from Grade 1

Reading Green Network - Map 11 Whiteknights & Cowsey



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- 33. Site developed for residential
- 34. Site developed for school





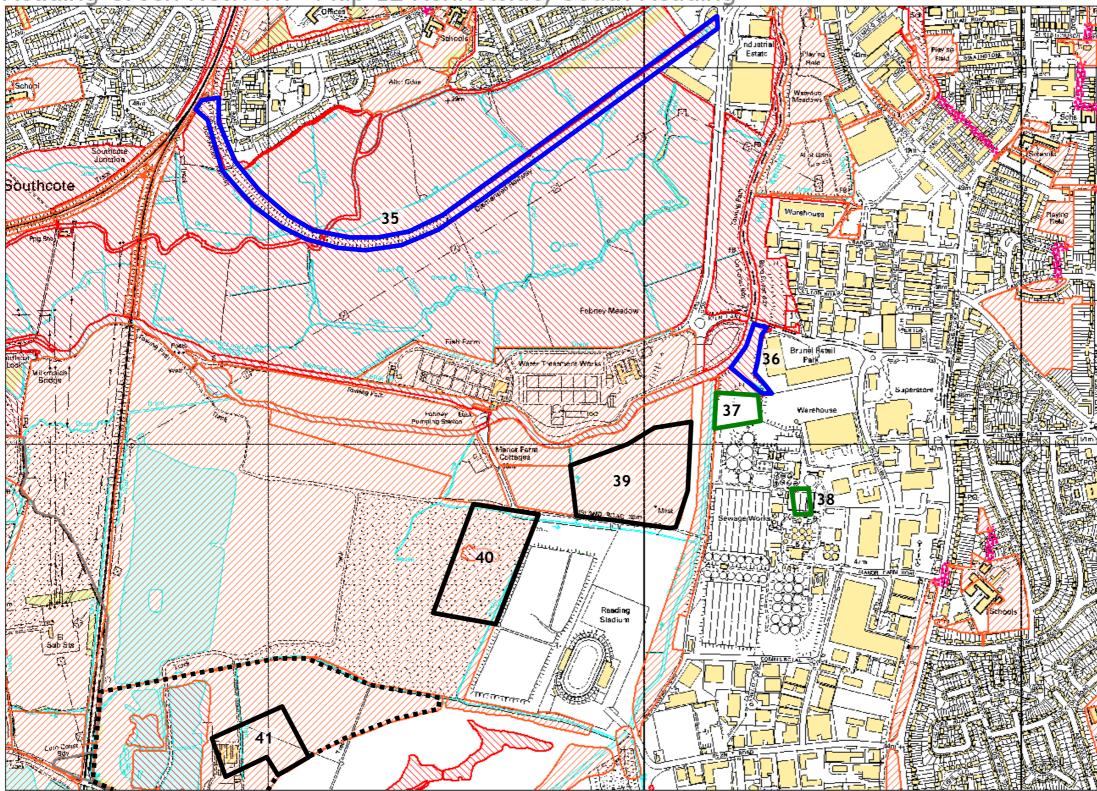
- Grade 1 Land
- Grade 2 Land
- Potential Green Link





- Development of Grade 1 or Grade 2 Land
- Upgrade to Grade 1
- Downgrade from Grade 1

Reading Green Network - Map 12 Kennetside, South Reading



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35. Downgraded from Grade 1 to Grade 2 as no longer considered BAP priority habitat

-

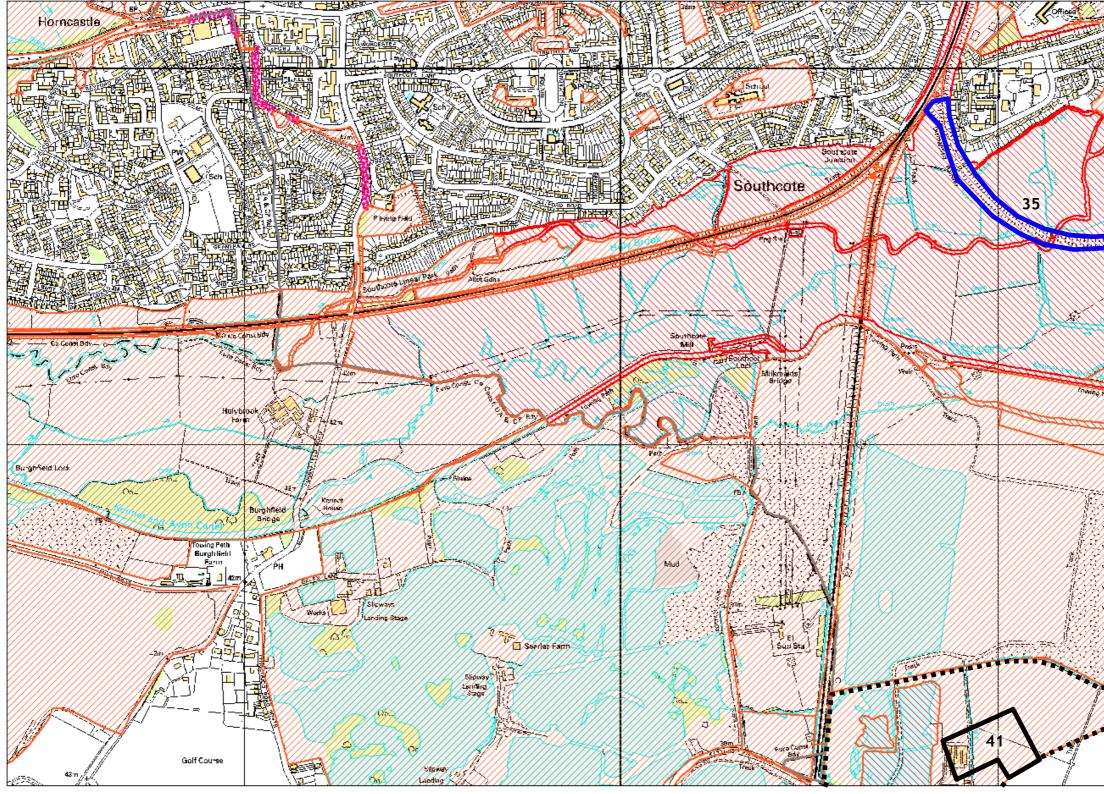
Ē

- 36. Downgraded from Grade 1 to Grade 2 as no longer considered BAP priority habitat
- 37. Nature reserve provided as part of development, likely Grade 1 once established.
- 38. New park provided, which would qualify as Grade 2
- 39. Site developed for industrial
- Site developed for recycling centre 40.
- 41. Under construction for residential, with wider future development site shown in dotted line

	Grade 1 Land
	Grade 2 Land
BRB	Potential Green Link
KEY -	2018 updated information
	Development of Grade 1 or Grade 2 Land

KEY - 2009 TVERC work

Reading Green Network - Map 13 Southcote & Kennet meadows



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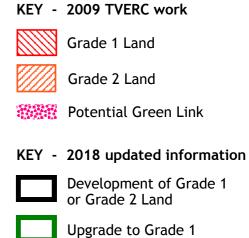
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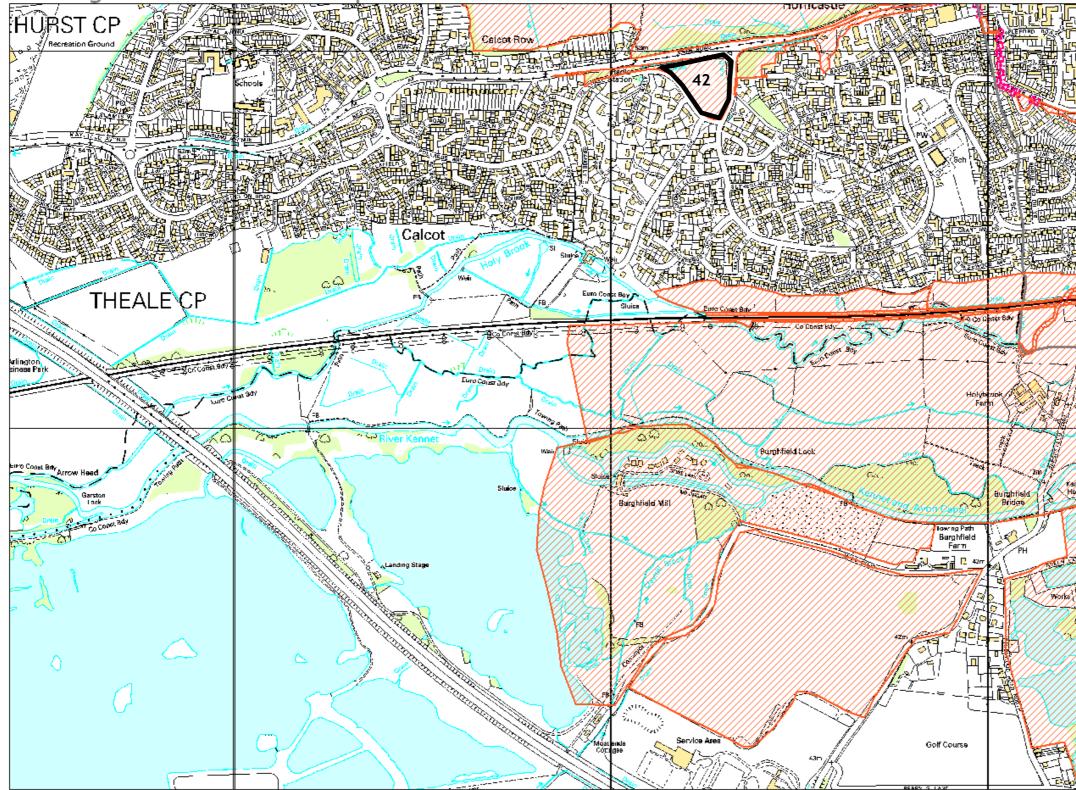


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- 35. Downgraded from Grade 1 to Grade2 as no longer considered BAPpriority habitat
- 41. Under construction for residential, with wider future development site shown in dotted line



Reading Green Network - Map 14 Kennet Meadows West

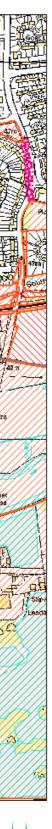


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42. Under construction for residential

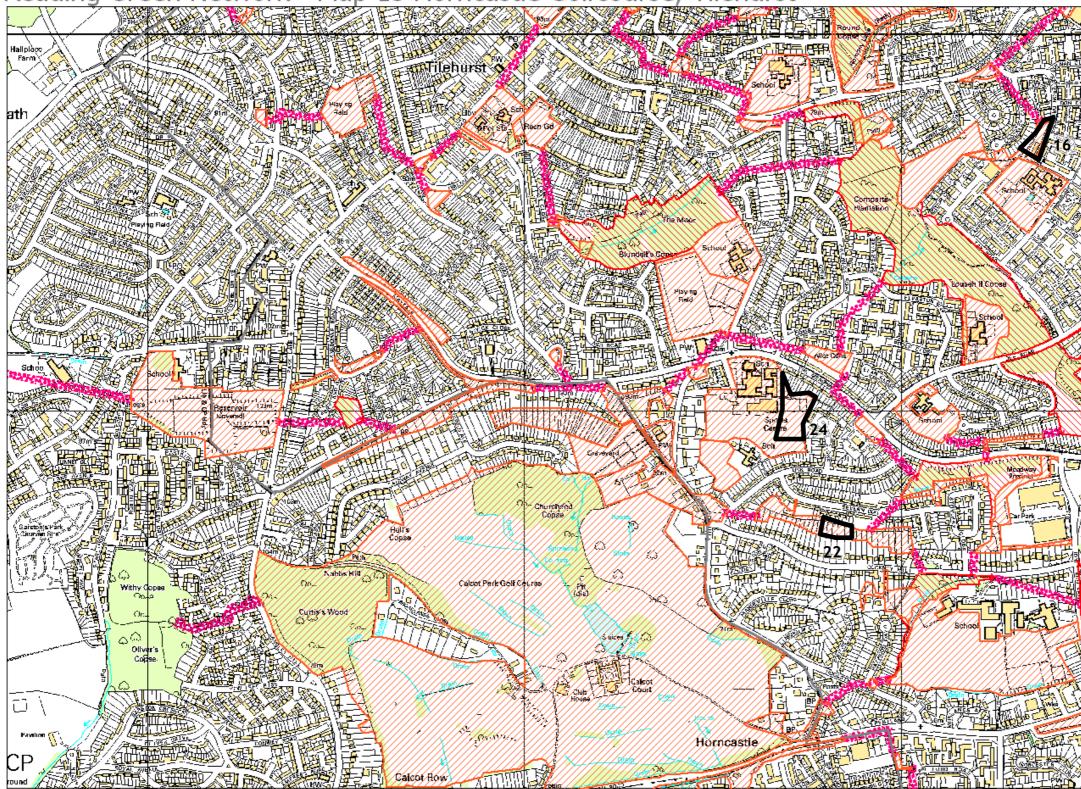
KEY - 2009 TVERC work

Grade 1 Land

- - Grade 2 Land
- Potential Green Link
- KEY 2018 updated information



- Development of Grade 1 or Grade 2 Land
- Upgrade to Grade 1
- Downgrade from Grade 1



Reading Green Network - Map 15 Horncastle Golfcourse, Tilehurst

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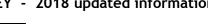
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- 16. Site developed for residential
- 17. Most of park now considered BAP priority habitat under Grade 1
- 22. Site developed for residential
- Under construction for residential 24.



KEY - 2009 TVERC work



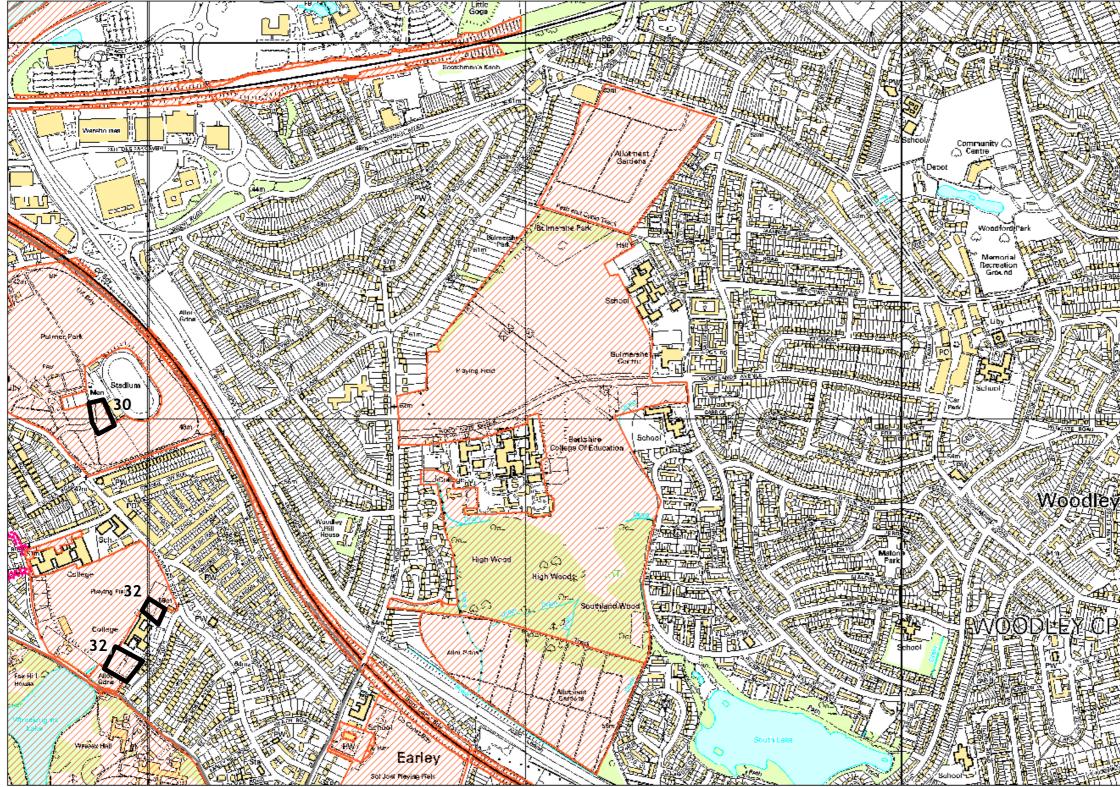


Development of Grade 1 or Grade 2 Land

Upgrade to Grade 1

Downgrade from Grade 1

Reading Green Network - Map 16 Earley and Woodley



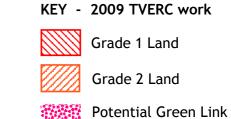
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- 30. Now part of car park
- 32. Site developed for residential







üΩE

- Development of Grade 1 or Grade 2 Land
- Upgrade to Grade 1
- Downgrade from Grade 1

APPENDIX 3: AFFORDABLE HOUSING APPEAL STATEMENT JANUARY 2018

Statement on Affordable Housing Provision as part of the Development of Small Sites.

Appendices

Appeal decisions over the last 2 years have consolidated the Council's case and set the precedent for subsequent decisions. As indicated in this evidence, there are now a total of 16 decisions that support the Council's case that local circumstances justify seeking affordable housing provision on small sites in accordance with local plan policies as an exception to the ministerial statement. Two of the decisions, by the same Inspector, did not support the Council's case on the failure to provide affordable housing. In one case the appeal was upheld; in the other the appeal was dismissed but the inspector did not consider that affordable housing was a requirement. Upon receipt of these appeal decisions in March 2017, the Council made a formal complaint to the Planning Inspectorate about their inconsistency with earlier decisions.

The Inspectorate responded in a letter dated 22nd June 2017. The letter accepts that there were a number of shortcomings and failures in both the approach and judgement in these appeals. They have apologised that the decisions fall short of standards and for any subsequent inconvenience caused. They have indicated that Inspector guidance is being updated and strengthened to ensure such errors do not occur again. A copy of the letter from the Inspectorate is attached as a separate Appendix.

An Extract from the Berkshire Strategic Housing Market Assessment (BSHMA) (Section 6, Affordable Housing) is also attached as an Appendix.

Policy Background

Introduction.

- 1.1 The Ministerial Statement of November 2014 and consequent changes to the NPPG sought to exempt sites of 10 or less houses from the provision of affordable housing or the payment of tariff type section 106 contributions. That directly affected the Council's affordable housing policies revisions to which had only recently been examined and found sound. Policy DM6, which covers proposals for 1-14 dwellings, was directly affected by the Ministerial Statement.
- 1.2 The Council's affordable housing policies are crucial in seeking to assist the Council in meeting the requirements of the NPPF which state that: "local planning authorities should...use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework,...."
- 1.3 The provision of affordable housing is a major issue in the borough. The borough experiences high levels of need as evidenced by a recent Strategic Housing Market Assessment and other indicators, its residents face major issues relating to affordability as a result of high and increasing house prices compared to average local incomes and significant issues in the future supply of affordable housing to meet identified needs. These matters are detailed below to demonstrate that

local circumstances justify lower (or no) thresholds as an exception to the national policy.

 In an Appeal decision dated 2nd December 2016 (Appeal Ref: APP/E0345/W/16/3153661, 17 St Barnabas Road, Emmer Green RG4 8RA), the Inspector concluded that:

> "In light of this, while the case in hand would be an exception to national policy, I consider there to be local circumstances that indicate the proposal should be determined in line with the development plan. A means of securing a contribution towards affordable housing would therefore, in my judgement, be justifiably sought in this instance. As the proposal fails to make an adequate provision for affordable housing, the development would also run contrary to Policy DM6 of the SDPD and the SPD."

He found the extent of the Council's evidence to be compelling. This decision has been followed by other decisions reaching the same conclusions. There are now a total of 16 appeal decisions that support the Council's case (admittedly there are 3 decisions that have not supported the Council's case which are dealt with in the evidence below). As indicated, the Council has received an apology from the Planning Inspectorate in respect of 2 of those decisions. These favourable decisions, along with the letter from the Planning Inspectorate, set an important precedent for the consideration of the current appeal.

Existing Planning Policy DM6 and SPD on Affordable Housing.

- 1.5 Reading Borough Council currently has a full local plan in place comprising the following documents:
 - Core Strategy, adopted January 2008;
 - Reading Central Area Action Plan, adopted January 2009;
 - Sites and Detailed Policies Document, adopted October 2012⁵³.
- 1.6 The Council adopted an Alteration to its Local Plan on 27th January 2015 (and in so doing has complied with all statutory requirements). This Alteration specifically related to its main Core Strategy affordable housing policy CS16 with minor changes to Policy DM6 in its Sites and Detailed Policies Document. The Draft Alteration had been through Examination and the Inspector's final report was received on 17th December 2014. The Inspector found the Alteration to be sound and did not request any modifications.
- 1.7 It is interesting that the Judgement in the High Court Case (West Berkshire District Council and Reading Borough Council Department for Communities and Local Government) reported at paragraph 42:

"On 17 December 2014, subsequent to the Written Ministerial Statement of 28 November, the Inspector produced a report on his examination of the revised

⁵³ These documents can also be found on the following web page: <u>http://www.reading.gov.uk/readingldf</u>

policies. He concluded that they were sound and should be adopted. Indeed, they were adopted on 27 January 2015. The Inspector considered the viability testing undertaken by the LPA and concluded that the targets contained in the policies were viable. In paragraphs 17 to 21 of his report he considered whether the policies were sufficiently flexible. He accepted that in a borough such as Reading, where most development will be on brownfield land, the viability of individual sites will vary widely according to matters such as ground conditions, demolition costs, remediation costs and existing use values, and consequently the targets would not be achievable in some cases. He also accepted that the policies expressly provided for the flexibility needed to deal with such situations, by enabling legitimate viability constraints to be advanced and taken into account. He concluded that the policies were sound because they allowed "wide scope for negotiation" and lower levels of affordable housing (paragraph 21). In reaching that view the Inspector plainly had regard to the requirements of the NPPF. He found that "the Plan complies with national policy" and that the Sustainability Appraisal was satisfactory."

1.8 The Council adopted a Supplementary Planning Document on Affordable Housing Provision in July 2013. This provides guidance on the implementation of the Council's adopted affordable housing policies.

Ministerial Statement and NPPG

- 1.9 The written ministerial statement by Brandon Lewis (Minister of State for Housing and Planning) on 28th November 2014, resulted in changes to National Planning Policy Guidance (NPPG) (Paragraph: 012 Reference ID: 23b-012-20141128). This states that on sites of 10 units or less, and which have a maximum combined gross floorspace of 1,000 square metres, affordable housing and tariff style contributions should not be sought. There is also provision for a financial credit, equivalent to the existing gross floorspace of any vacant buildings brought back into any lawful use or demolished for re-development, which should be deducted from the calculation of any affordable housing contributions sought from relevant development schemes. The written ministerial statement and changes to the NPPG also sought to deter tariff-style Section 106 contributions to essential infrastructure, such as education, leisure or transport.
- 1.10 The government has put forward these changes to reduce "disproportionate" burdens on developers. The government estimates that the policy will save considerable sums and will deliver savings for small-scale developers in some parts of the country. They expect implementation of these measures to have a significant positive impact on housing numbers.
- 1.11 The Council, in line with many councils in different parts of the country, viewed the changes with considerable dismay for a number of reasons. A major reason was that the measures would have a significant impact on the contributions towards the provision of affordable housing that the Council would have expected under its adopted planning policies. It was also likely that many applicants would want to vary Section 106 agreements or re-submit applications to replace existing permissions on the basis of no longer providing affordable housing in compliance with local plan policies.

Judicial Review and Court of Appeal.

1.12 Following the receipt of legal advice from Counsel, West Berkshire Council and Reading Borough Council decided to apply to the High Court for a Judicial Review of the Ministerial Statement. Permission was granted and the case was heard in the High Court by Mr Justice Holgate on 29th and 30th April 2015. The decision was handed down on 31st July 2015. It upheld the appeal. The Secretary of State removed the changes made to the NPPG consequent to the Written Ministerial Statement.

1.13 It is notable that at paragraph 99(iii) of the judgement, the Judge reports that a statement made to the Court on behalf of the Secretary of State seeking to explain the effect of the new national policy accepted that:

"In the determination of planning applications the effect of the new national policy is that although it would normally be inappropriate to require any affordable housing or social infrastructure contributions on sites below the thresholds stated, local circumstances may justify lower (or no) thresholds as an exception to the national policy. It would then be a matter for the decision-maker to decide how much weight to give to lower thresholds justified by local circumstances as compared with the new national policy;"

- 1.14 The High Court decision was appealed by the Secretary of State. Hearings in the Court of Appeal took place during March 2016. The Decision of the Court of Appeal was handed down on 11th May 2016 (see: http://www.gct-jcs.org/Documents/Examination-Document-Library-6/EXAM-229---West-Berkshire--Reading-Court-of-Appeal-Case.pdf). The Court of Appeal found in favour of the Secretary of State on all grounds and the High Court decision was set aside. The Changes to the NPPG and the Written Ministerial Statement were reinstated.
- 1.15 The Court of Appeal decision provides some pertinent legal advice on the interpretation of ministerial policy. At paragraphs 16 -18 the decision sets out 2 principles:
 - The decision maker cannot blindly follow a pre-existing policy without considering anything said to persuade him that the case in hand is an exception;
 - a policy-maker (notably central government) is entitled to express his policy in unqualified terms. He is not required to spell out the legal fact that the application of the policy must allow for the possibility of exceptions.

These principles are explained, with reference to legal precedents, in more detail in subsequent paragraphs in the judgement.

1.16 Paragraph 26 quotes the statement made to the High Court on behalf of the Secretary of State seeking to explain the effect of the new national policy (which is partially set out at *para. above*). At Paragraph 28, the Court of Appeal concludes in relation to the WMS that:

"The policy's unqualified terms do not demonstrate that it was intended to countermand or frustrate the effective operation of the statute."

The Court accepted the statement made on behalf of the Secretary of State that,

"local circumstances may justify lower (or no) thresholds as an exception to the national policy."

It is therefore clear that a LPA or other decision maker can seek to demonstrate that local circumstances justify an exception to the WMS and NPPG. This statement refers below to various Inspectors' decisions in Reading and elsewhere. In these cases, in line with the Court of Appeal judgement, local circumstances

have been used to justify lower thresholds as an exception to the national policy. Copies of a selection of appeal decisions for Reading Borough are attached as separate documents.

1.17 The remainder of this statement sets out the local circumstances that pertain in Reading Borough and the Council's case that these justify the use of lower thresholds in Reading as an exception to the Ministerial Statement.

Reading Borough Council Policy Position in the light of the decision of the Court of Appeal.

- 1.18 On 23rd July 2016, the Council's Strategic Environment Planning and Transport Committee considered a report of the Court of Appeal Decision, noted the implications for its policies on affordable housing and, in the light of a summary of a case on why local circumstances should be seen to outweigh national policy, resolved to continue to operate Policy DM6 with some adjustments. A copy of the report is attached at Appendix1.
- 1.19 The committee resolved to continue to operate Policy DM6 on the following basis:

"Implement Policy DM6 but excluding proposals that solely involve the conversion of an existing property, where the conversion involves the provision of 10 or less dwelling units (i.e. not HMOs), or the replacement of dwellings by the same number of replacement dwellings where there is no net increase."

1.20 At the time of the handing down of the decision of the Court of Appeal, Reading Borough Council was holding a total of 59 planning applications which were proposing 10 or less dwellings, and for which Policy DM6 was relevant, which remain undetermined. Most of the applications were submitted in 2016, 19 were submitted during 2015. Three date from 2014. The profile of what was proposed under the undetermined applications was as follows:

Conversion to provide 1 additional dwelling	8 applications
1 dwelling	23 applications
2/3 dwellings	22 applications
4 dwellings	2 applications
5-9 dwellings	4 applications

1.21 As can be seen, all but 4 applications involved relatively small applications where the policy only requires a contribution of 10% of the cost of an affordable unit for each unit. On small sites of less than 5 dwellings, the Council's practice in accordance with its Affordable Housing SPD is to seek 5% of the gross value of the development. This can produce payments of around £12-25,000 per dwelling unit.

National Planning Policy

1.22 Relevant references in the NPPF and NPPG relating to affordable housing are set out at Appendix 2 to this statement. However, it is worth recalling government policy at Paragraph 47 of the NPPF which indicates that:

"To boost significantly the supply of housing, local planning authorities should:... use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and **affordable housing** in the housing market area,..." (my emphasis)

Paragraph 50 of the NPPF goes on to indicate that:

"where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.

1.23 National planning policy therefore requires local planning authorities to plan for the identified need for affordable housing in their areas. Unfortunately besides inherent difficulties in achieving affordable housing via private sector development, various changes to the law as well as national policy since the NPPF was published in 2012, have made it, and are increasingly making it difficult for local planning authorities to demonstrate that they can plan for and achieve such identified need. This argument is considered in more detail below under the heading, "The Future Supply of Affordable Housing."

The Operation of Planning Policies on Affordable Housing in Reading

- 1.24 Reading Borough has, historically, successfully promoted policies for affordable housing within the context of national policy. It has sought affordable housing from all sites of one unit and above since October 2012, when policy DM6 was introduced following its adoption as part of the Sites and Detailed Policies Document. That intention to seek provision on sites of below 15 dwellings had been referred to in the Core Strategy Policy CS16 which had been adopted in 2008.
- 1.25 As evidenced by the Council's most recent Annual Monitoring Report (2017), the Council has more than 5 years housing land supply (sites with planning permission that are capable of being delivered within the 5 year period measured against the OAN identified in the 2016 Berkshire Strategic Housing Market Assessment). While development did slow during the years of the economic recession, the Housing Trajectory continues to show that housing development in the plan period remains ahead of housing requirements. Monitoring of housing commitments shows that there is a high level of dwellings under construction on sites where development has commenced at 31st March 2017. Completions are therefore at a high level. The Housing Trajectory also shows that there remains a high level of anticipated development feeding through for future years. There is no evidence that the policies and the requirements for affordable housing or infrastructure contributions contained in these policies have had a negative impact on the rate of development.
- 1.26 The Altered Local Plan policies on affordable housing are based on a viability study prepared in 2014 to specifically test affordable housing targets under both polices CS16 which governs sites of 15 dwellings and above and DM6 which deals with policies below 15 dwellings. This viability study tested a range of developments of different sizes and types and found that the policy requirements would, in the terms of paragraph 173 of the NPPF, "when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable." This evidence clearly demonstrates that development is viable and the policies do not impose "disproportionate" burdens on developers. A more recent study,

undertaken in 2017, confirms that the targets and thresholds remain viable and have therefore been carried forward into the recently approved and published policy H3 in the Pre-Submission Draft Reading Borough Local Plan.

- 1.27 Policy DM6 has fully considered the impacts of its requirements, along with other policy requirements (e.g. infrastructure contributions, Sustainable Building Standards, etc.), in its formulation and been found sound on the basis of the NPPF test to provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.
- 1.28 Policy DM6 itself provides, as a matter of course, that if landowners or developers are able to demonstrate that policy requirements would impede delivery, or on the individual facts of the case are disproportionate, an exception would be provided. Policy DM6, both in its current form and in the altered form, which was found to be sound and adopted in January 2015, specifically states:

"In all cases where proposals fall short of the policy targets/thresholds as a result of viability considerations, an open-book approach will be taken and the onus will be on the developer/landowner to clearly demonstrate the circumstances justifying a lower affordable housing contribution."

Where viability is an issue the Council has responded accordingly to ensure that affordable housing and Section 106 requirements do not make a development undeliverable. It follows that Policy DM6 does not therefore impose disproportionate burdens on developers.

The Supply of Affordable Housing under Policy DM6

- 1.29 The Council has secured substantial affordable housing from small sites of 10 and fewer dwellings. The Background Information submitted to the Secretary of State in 2014 to support the Alteration to the Local Plan Affordable Housing Policies, found that on average each year 23.5% of residential development in Reading Borough is on sites of 1-9 units. It also found that a further 11.6% was on sites of 10-14 dwellings, so it is fair to conclude that around 25% of annual housing completions in the Borough are on sites of 10 or less dwellings. These small sites therefore make up a substantial proportion of the housing land supply in the Borough.
- 1.30 The Background Paper goes on to estimate that the annual average level of provision would provide 22 affordable dwelling units on sites of 1-9 units under the target requirements in Policy DM6. With sites of 10-14 units estimated to be capable of providing an average of 25 units under the policy, it is estimated that a total of 25 -30 units of necessary affordable housing could, potentially, be provided under the policy if there were no other considerations. The Council had been providing an average of 142 affordable housing units per year via its planning policies prior to the introduction of Policy DM6, which enabled affordable housing to be sought on sites of less than 15 dwellings. The expectation at the time that policy was introduced was that, over time, average affordable housing completions would rise to 167 units, although other subsequent legislative changes, discussed later in this statement, have since reduced the expected level of affordable housing.
- 1.31 Reading Borough Council's monitoring shows that, since October 2012, when Policy DM6 was first introduced, up until 31st December 2014, at about the time of the

Ministerial Statement on sites of 10 or less dwellings, a period of only 2 years and in the start-up phase of the new policy, Reading Borough Council entered into signed Section 106 agreements, or received Unilateral undertakings, from new permissions that will provide:

- Affordable units 11
- Contributions towards affordable housing £1,072,533.00.

Between 1st January 2015, and 31st March 2016, there have been further commitments that will realise 3 more affordable housing units on site and a further £1.1m in financial contributions

- 1.32 It is estimated that that the level of financial contribution will enable the Council or a Housing Association to subsidise around 25-30 affordable housing units per annum. Added to the committed provision on site, Policy DM6 has therefore produced agreements for around 40-45 affordable housing units in its first 3 years, in an uncertain economy and in an environment of continuing changes to government policy. It also needs to be borne in mind that since the Written Ministerial Statement in November 2014, the Council has determined very few applications for this size of development. Most applicants have either withdrawn their application or have chosen to allow extensions of time so that their applications were not determined until the judicial review had run its course.
- 1.33 Background Information indicates that an average of 142 affordable housing units were provided per annum in the period 2003-2013. The provision of an estimated additional 30 units per annum from sites of 10 or less units would add 21% to the average overall supply of affordable housing in the Borough. Provision of affordable housing from small sites under policy DM6 is therefore an important part of the supply of affordable housing in the Borough

The Need for Affordable Housing.

1.34 There is a high need for affordable housing in Reading as evidenced by the recently published Berkshire Strategic Housing Market Assessment and other evidence set out below.

Berkshire Strategic Housing Market Assessment (BSHMA)

- 1.35 Section 6 of the BSHMA covers affordable housing need. Affordable housing need was assessed using the methodology set out in the NPPG. The analysis that follows is consistent with the requirements of NPPG. A copy of Section 6 of the SHMA is attached separately to this statement. A copy of the full BSHMA can be found at: http://www.reading.gov.uk/media/2959/Housing-Market-Assessment/pdf/Berkshire_Strategic_Housing_Market_Assessment_Feb_2016.pdf
- 1.36 The Berkshire (including South Bucks) Strategic Housing Market Assessment Final Report dated February 2016 concludes by setting out the assessed Objectively Assessed Need (OAN) for each of the authorities jointly considered in the assessment. The OAN for each authority is set out in Table 139 which is copied below.

				_	•	
	2012-based Household Projection (adjusted to reflect 2013 MYE)	London Uplift	Economic Uplift	Reversing Suppressed Household Formation	Improving Affordability	OAN (Homes per annum)
West Berkshire	537	14	35	32	47	665
Reading	541	68	33		57	699
Wokingham	680	18	86		72	856
Bracknell Forest	535	24	0	32	44	635
Western Berkshire HMA	2,293	124	154	64	220	2,855
RBWM	657		0		55	712
Slough	875		0		52	927
South Bucks	339		0		37	376
Eastern Berks & South Bucks HMA	1,871		0	0	144	2,015
Study Area	4,164	124	154	64	364	4,870

Table 139: Conclusions on Full Objectively-Assessed Housing Need by OAN, 2013-36

1.37 The table below provides an interesting comparison of the projected annual need for affordable housing in each of these authorities in the period 2013 - 2036.

Authority	OAN	Affordable Housing Need	Proportion of OAN that is need for affordable
Bracknell Forest	665	227	34.14
Reading	699	406	58.08
West Berkshire	635	189	29.76
Wokingham	856	441	51.52
WBHMA	2855	1,263	44.24
Slough	712	671	94.24
South Bucks	376	167	44.41
Windsor and Maidenhead	927	434	46.82
ЕВНМА	2015	1273	63.18
BHMA	4870	2537	52.09

1.38 For Reading Borough the identified need for 406 dwellings per annum represents 58% of the OAN of 699 dwellings per annum. The corollary is that of the OAN of 699 dwellings, the Borough only needs to provide 293 market price and market

rented units per annum. All the rest should be affordable units as currently (pre-Housing and Planning Act 2016) defined.

- 1.39 Reading Borough has the highest proportion of annual affordable housing need in the West Berkshire HMA. It is also higher than the average proportion for Berkshire as a whole. Slough has a very stark level and proportion of need for affordable housing which does skew the Berkshire figures and it is accepted that the situation in terms of need in Slough is even more pressing than in Reading. However, if Slough is excluded, the EBHMA proportion figure falls to 46.12% and the BHMA figure falls to 44.83%. As can be seen when Slough is excluded the figure for Reading is significantly higher than the remaining authorities.
- 1.40 Table 73 page 221 of the BSHMA (copied below) provides a breakdown of the estimated number of households living in unsuitable housing (2013 HMAs and local authorities). This shows that the urban areas of Reading and Slough have by far the highest numbers of such households in the County. In Reading's case, it has not far off a half of all such households in the Western Berkshire HMA Area and more than twice as many as any of the other Western Berkshire authorities.

Area	Homeless	Temporary Accomod- ation	Over- crowded	Concealed	AH tenants	Other tenures	Total
Bracknell Forest	11	61	1,342	479	161	898	2,952
Reading	0	111	3,879	1,025	214	1,854	7,084
West Berkshire	0	45	1,411	677	180	1,320	3,634
Wokingham	0	8	1,179	689	89	1,181	3,145
Western Berkshire HMA	11	225	7,811	2,870	644	5,254	16,815
Slough	0	82	6,602	2,036	219	1,406	10,345
South Bucks	0	36	688	537	68	516	1,845
RBWM	0	43	2,137	780	162	1,357	4,479
Eastern Berkshire & South Bucks HMA	0	161	9,426	3,353	450	3,280	16,669
Study area	11	386	17,237	6,223	1,094	8,533	33,484

Table 73: Estimated number of households living in unsuitable housing (2013 – HMAs and local authorities)

Source: CLG Live Tales, Census (2011) and data modelling

1.41 These figures are then subject to further analysis to provide figures for unmet need for affordable housing from existing households living in unsuitable accommodation. As can be seen from Table 75 (copied below), Reading has more than twice as much existing unmet need compared to the other authorities in the in the Western Berkshire HMA Area (2,409 households compared to 922, 1021 and 956).

Area	In unsuitable housing (taken forward for affordability test)	% Unable to Afford Market Housing (without subsidy)	Revised Gross Need (including Affordability)
Bracknell Forest	1,547	59.6%	922
Reading	4,284	56.2%	2,409
West Berkshire	1,978	51.6%	1,021
Wokingham	1,766	54.2%	956
Western Berkshire HMA	9,575	55.4%	5,309
Slough	6,344	65.1%	4,132
South Bucks	1,095	61.7%	676
RBWM	2,549	61.4%	1,566
Eastern Berks and			
South Bucks HMA	9,988	63.8%	6,374
Study areas	19,564	59.7%	11,683

Table 75: Estimated Current Affordable Housing Need (2013)

Source: CLG Live Tales, Census (2011), data modelling and affordability analysis

1.42 Table 76 then provides the estimated Level of Affordable Housing Need from Newly Forming Households (per annum) - 2013-36. As can be seen, Reading has significantly higher levels of newly forming households per annum with housing need compared to the other authorities in the Western Berkshire HMA Area (522 compared to 426, 393 and 477). Table 77: provides figures for the estimated level of Housing Need from Existing Households (per annum). Reading has by far the highest level of such need arising in any of the authorities in Berkshire (including Slough) at 27.5%. The other Western Berkshire authorities experience figures of 10.8%, 6.1% and 16.7%.

Table 76: Estimated Level of Affordable Housing Need from Newly Forming Households (per annum) – 2013-36

Area	Number of new households	% unable to afford market housing without subsidy	Total in need
Bracknell Forest	1,029	41.5%	426
Reading	1,289	40.4%	522
West Berkshire	1,150	34.2%	393
Wokingham	1,335	35.7%	477
Western Berkshire HMA	4,803	37.8%	1,818
Slough	1,560	47.7%	743
South Bucks	520	39.7%	207
RBWM	1,246	43.9%	548
Eastern Berks and			
South Bucks HMA	3,326	45.0%	1,498
Study area	8,129	40.8%	3,315

Source: Projection Modelling/Income analysis

1.43 Table 81 (copied below) provides the overall estimated level of Affordable Housing Need per annum - by HMA and local authority. That table is repeated in the conclusions to the study. As can be seen in the copy of the table below, the levels of need for affordable housing in Berkshire are extremely high. For Reading Borough along with Slough Borough, the need is particularly high.

Area	Current need	Newly forming households	Existing households falling into need	Total Need	Supply from existing stock	Net Need
Bracknell Forest	40	426	135	601	374	227
Reading	105	522	343	970	564	406
West Berkshire	44	393	208	645	457	189
Wokingham	42	477	76	594	153	441
Western						
Berkshire HMA	231	1,818	762	2,810	1,548	1,263
Slough	180	743	282	1,205	534	671
South Bucks	29	207	51	287	120	167
RBWM	68	548	154	769	335	434
Eastern Berks						
and South						
Bucks HMA	277	1,498	487	2,261	988	1,273
Study area	508	3,315	1,248	5,072	2,535	2,537

Table 81: Estimated level of Affordable Housing Need per annum – by HMA and local authority

Source: 2011 Census/CoRe/Projection Modelling and affordability analysis

Comparison of housing need in recent HMA's in surrounding areas.

- 1.44 A comparison of the need in Reading with the need identified though HMA's undertaken in adjoining authorities in the South East, Oxfordshire, Buckinghamshire and Surrey, has been undertaken to show the relative levels of need for affordable housing. The comparison is set out in detail in Appendix 3.
- 1.45 Oxford City suffers high levels of affordable housing need similar to the tightly bounded urban district/Boroughs in Berkshire (Reading and Slough). However the remaining more rural districts exhibit rather less demanding levels of need in comparison with Reading.
- 1.46 Buckinghamshire: The SHMA undertaken by ORS/Atkins is on a different basis to the BSHMA but indicates a significantly lower proportion of need for affordable housing in relation to the overall OAN compared to Berkshire as a whole and Reading in particular. Proportions rarely reach 20% of the OAN.
- 1.47 Hampshire: Again Reading exhibits significantly higher levels of need than the Hampshire authorities for which a comparison has been made.
- 1.48 West Surrey: All the West Surrey authorities, Guildford, Waverley and Woking exhibit very high levels of affordable housing need as a proportion of their identified OAN. The Hart, Rushmoor and Surrey Heath HMA provided a generalised figure for the proportion of OAN that is need for affordable housing. This pointed to a more modest level of need than found in Reading

1.49 The analysis shows that Reading has a high level of need for affordable housing when compared with other nearby authorities in the South East, with only Oxford, Slough and the West Surrey authorities showing comparable or higher levels of need.

Other Evidence of Need

- 1.50 Reading Borough Council (RBC) is currently experiencing almost unprecedented pressure for affordable housing with homeless presentations at record levels. Figures to demonstrate the local circumstances of need in the Borough at the current time can be summarised as follows:
 - RBC has seen families presenting as homeless at record levels. There have increased substantially in recent years. There have been an average of 55 homeless presentations a month in 2015/16;
 - There are an average of 25 homelessness acceptances per month;
 - The Council currently has 179 people in temporary accommodation;
 - More than 150 families are currently in Bed and Breakfast, many of whom are not being housed within Reading Borough. Families frequently have to stay in Bed and Breakfast for many months;
 - The council expects to lose 40 -50 dwellings per year under the Right to Buy Scheme;
 - Because of the lack of affordable housing in Reading, the Council no longer sees the numbers of void properties coming back through the system as was once the case, as families, for whatever reason, are tending to stay in their current affordable homes. This means that there is less move-on accommodation available for families in Bed and Breakfast.
- 1.51 At March 2016, there were 5088 households registered on the Council's Housing Register. It should be noted that the Council's Housing Register only registers households with a demonstrably, relatively high level of need for affordable housing accommodation. It is no longer a register that records any household expressing a need for affordable housing
- 1.52 During 2015/2016, RBC accepted 1299 new applicants with a high level of need on its Housing Register. During the same period, it provided accommodation in council owned dwellings and RSL (housing association) dwellings for 395 households from its Housing Register. It is clear that only a fraction of those registered or registering have any prospect of being allocated accommodation in any one year. That figure is likely to reduce significantly in the future as Right to Buy continues to reduce the stock and the numbers of new affordable dwellings also reduces as the various continuing changes to government policy on the provision of affordable housing take effect or are added to.

House Prices and Affordability

- There are various sources of data for average house prices but on any measure, 1.53 prices in Reading are relatively high. Average House Prices for January 2018 (using Mouseprice http://www.mouseprice.com/area-guide/price-earnings-ratio/rg30%204js) show Reading, with an overall average price of £425,000 but with cheaper, e.g. RG2 (£333,800), and more expensive areas, e.g. RG4 (£498,400). For Reading the average earnings are £28,556 which gives an average price / earnings ratio of 14.44 compared to a national ratio of 12.55. In RG2, the average earnings are £22,799 which gives an average price / earnings ratio of 14.64. For RG4, the average earnings are £31,225 which gives an average price / earnings ratio of 15.96. It is commonly accepted that ratios above 3.5 are challenging and that it is difficult to obtain loan finance about these levels. Most housing in the Borough is therefore unaffordable by large sections of the population. While there are areas of the South East with higher prices than Reading and with higher price / earnings ratios, the reality is that any area with a ratio of much more than 3.5 has real issues with housing affordability
- 1.54 Housing rents are also very high in Reading as shown in the following table which is extracted from Home.co.uk:

www.home.co.uk/for_rent/reading/current_rents?location=reading

Property Rents in Reading by Number of Bedrooms					
	No. of properties	Average rent	Median rent		
One bedroom	387	£800 pcm	£777 pcm		
Two bedrooms	371	£1,088 pcm	£1,001 pcm		
Three bedrooms	208	£1,313 pcm	£1,259 pcm		
Four bedrooms	164	£1,691 pcm	£1,699 pcm		
Five bedrooms	107	£2,270 pcm	£2,249 pcm		

As can be seen, rental levels are very high despite the fact that there are currently a considerable number of properties on the market.

Current initiatives to provide affordable housing

- 1.55 The Council has a housing strategy designed to maximise the provision of affordable housing in the Borough. Unfortunately the Council has very limited landholdings capable of development or redevelopment for housing. In addition, government rules on borrowing, and over the use of right to buy receipts, are making it very difficult for the Council to invest directly in new housing. The Council had set up a New Build Council Housing Programme but this had to be abandoned as the result of Treasury controls on rent rises which meant that investment in a number of emerging proposals became unviable.
- 1.56 The Council's current building programme includes the following:
 - The building of 57 new affordable homes at Conwy Close;
 - Extra Care housing at Albert Road;

- The redevelopment of a small number of small garage sites to yield rented affordable stock;
- Building 28 temporary accommodation units council owned land to ease pressure on Bed and Breakfast accommodation;
- Support and operation of the Rent Guarantee Scheme to engage local landlords in letting their property to families in housing need;
- Investment of S106 affordable housing financial contributions via the planning system. This remains the largest source of supply of new affordable housing;
- Setting up an arm's length housing company to buy private property to then rent out.

While efforts are being made by the Council to directly increase affordable housing provision, the opportunities and funding needed to do so are very limited. Contributions achieved through the planning system are crucial to in any way tackling the need and problems identified. As set out above, in the light of local circumstances, the contribution from small sites plays a significant to role in the current supply of affordable housing.

The Future Supply of Affordable Housing.

- 1.57 Reading is an urban authority with boundaries situated on the edge of the urban area or which cut through urban areas. Where there are open boundaries, along the River Thames and adjacent to the Kennet Meadows, the land is generally in the floodplain and constrained by strategic open space designations. Consequently, there are very few greenfield development sites. Well over 90% of the development that occurs within the Borough is inevitably on previously developed land. Such sites are often challenging in terms of practical development and viability as a result of high costs and high existing use values. This is clearly taken account of in negotiating planning applications and in many cases large sites of more than 10 dwellings provide significantly less than the target figure of 30% under policies CS15 and DM6.
- 1.58 The opportunities to provide new affordable housing as part of private development is, and always has been, therefore, very constrained and challenging. It will remain so into the future. The Council's existing local plan contains a number of allocations for residential development but most of them relate to expensive redevelopments of town centre sites or the regeneration of old industrial sites alongside the A33 in Reading. The Council is currently reviewing its local plan but the call for sites and its own housing land availability work continues to relate to similar town centre sites or other regeneration opportunities. They involve little or no greenfield opportunities unless sites have been put forward under the call for sites that relate to sensitive open space or sites in the floodplain.
- 1.59 As can be seen, Reading Borough experiences very particular supply problems because it is almost wholly urban, it has very tight boundaries and consequently it relies almost wholly on challenging, previously developed or very constrained sites, for providing additional residential development. The lack of unconstrained greenfield sites, which generally have much more favourable viability, severely limits the amount of affordable housing that can be achieved in the Borough.
- 1.60 That position has not been helped by various recent changes to government policy and will be further undermined by prospective changes in the near future. Urban

local authorities such as Reading, in particular, lost considerable potential affordable housing provision through the government's decision to make changes of use from offices to residential a form of permitted development. Such changes of use had provided significant contributions to affordable housing in Reading in the past. Over the period 2013 to January 2018, a total of 1,585 units have received prior approval for such change of use. The Council estimates that, had these schemes provided policy-compliant levels of affordable housing, it would have resulted in 444 units and £2,559,000 towards off-site provision. As can be seen a large amount of potential affordable housing contribution has been lost through this measure.

- 1.61 As indicated, Reading is an almost wholly urban area and nearly all its development derives from previously used sites. Many, if not nearly all, will contain or have had existing buildings and floorspace. Under the Ministerial Statement, there is now a requirement that the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. For an urban authority, such as Reading, this is also likely to have very significant negative impacts on future AH provision in the Borough.
- 1.62 Section 5 of the Housing and Planning Act 2016 makes provision for regulations to require that an English planning authority may only grant planning permission for a residential development of a specified description if the starter homes requirement is met.
- 1.63 Recent consultation on draft regulations have indicated that all developments of 10 or more dwellings will provide 20% of dwellings as starter homes. This will be provided before any other form of affordable housing is provided. Inevitably this will mean that very limited opportunity will remain within developments to provide affordable housing within existing policy targets. It is anticipated that very few households in Reading in need of affordable housing will be able to afford a Starter Home which will have a maximum discounted price of £250,000. These measures are and will have a significant impact on the affordable housing that will be provided by larger development sites, emphasising the importance of the contribution that needs to be made through small sites.

The Emerging Reading Borough Local Plan

1.64 The Council's Pre-Submission Draft Reading Borough Local Plan was approved by the Council's Strategic Environment Planning and Transport Committee on 22nd November 2017 and subsequently published for consultation⁵⁴. It is expected that the plan will be submitted to the Secretary of State during March 2017. The Draft Local Plan carries forward the two affordable housing policies in the existing adopted local plan (policies CS15 and DM6) in a single policy (policy H3) with some very minor wording changes based on the changes agreed in July 2016. The existing targets and thresholds remain the same as in the current adopted plan. An up to date viability assessment has confirmed that these targets and thresholds remain viable in current market conditions. The emerging local plan is now at an advanced stage in preparation and in accordance with Annex 1 to the NPPF will carry weight as a material planning consideration in the determination of planning applications and appeals.

⁵⁴ See: <u>http://www.reading.gov.uk/media/8053/Pre-Submission-Local-Plan-November-2017/pdf/Pre-Submission_Local_Plan_November_2017.pdf</u>

1.65 This plan proposes the allocation of a number of new sites including 2 "greenfield" sites. While new sites will be a potential source of additional affordable housing over the life of the plan up to 2036, few of those sites are likely to be developed in the short term and viability considerations will continue to make achieving 30% affordable housing provision very challenging. Small sites of less than 10 dwellings will, therefore, continue to play a major role in the supply of housing in Reading Borough.

Relevant Appeal Decisions in Reading

1.66 Reading Borough Council has now received 16 appeal decisions supporting its contention that local circumstances justify lower (or no) thresholds as an exception to the national policy. The Appeal Decision Reference Nos. and details are listed in Appendix 7.

The Council has also received 4 decisions where its case that local circumstances justify lower (or no) thresholds as an exception to the national policy has not been accepted. These are also discussed below.

1.67 An appeal decision dated October 2016 concerned a proposed development involving the demolition of an existing house and garage and the erection of a new building containing 4 x 2-bed and 4 x 1-bed flats with associated car parking (Appeal Ref: APP/X0360/W/16/3154971) at 51 Cressingham Road, Reading. This was the first appeal on affordable housing for which the Council had been able to submit a full case on local circumstances in relation to the provision of affordable housing. In his decision letter, the Inspector found that:

> ".... the Council has submitted a considerable amount of evidence which indicates that specific local circumstances within the Borough justifies a lower threshold for affordable housing contributions, as an exception to national policy. I have been referred to a recent Appeal Decision (Ref: APP/E0345/W/ 16/3153661 - see above) where the Inspector considered that balancing the importance of avoiding disproportionate burdens on the developer was outweighed by the specific affordable housing needs in Reading, rising market values, and the significant contribution towards the delivery of affordable housing in the Borough that small sites make. While I am not aware of the level of detail submitted in that case, on the evidence before me, I find the Council's case to be persuasive."

1.66 The letter goes on to state:

".....I consider there to be local circumstances that indicate the proposal should be determined in line with the development plan. A means of securing a contribution towards affordable housing can therefore be justifiably sought in this instance.

1.67 An early appeal decision that supported the Council's case was dated 2nd December 2016 (Appeal Ref: APP/E0345/W/16/3153661, 17 St Barnabas Road, Emmer Green, RG4 8RA). In dismissing the appeal for a proposed 4 bed dwelling in the rear garden of No. 17 St Barnabas Road, the Inspector concluded that:

"In balancing the importance of avoiding disproportionate burdens on the developer, in pursuance of encouraging more house building, against the specific affordable housing needs in Reading, rising market values, and the significant contribution towards the delivery of affordable housing in the Borough that small sites make, I find the extent of the Council's evidence to be compelling."

1.68 The Inspector went on to say,

"In light of this, while the case in hand would be an exception to national policy, I consider there to be local circumstances that indicate the proposal should be determined in line with the development plan. A means of securing a contribution towards affordable housing would therefore, in my judgement, be justifiably sought in this instance. As the proposal fails to make an adequate provision for affordable housing, the development would also run contrary to Policy DM6 of the SDPD and the SPD."

This decision clearly accepted that there is a compelling case for the provision of affordable housing in Reading Borough in accordance with the Council's adopted policies (in this case policy DM6) as an exception to national policy.

- 1.69 Subsequent appeal decisions followed the reasoning of the first appeal decisions. The third appeal decision (APP/E0345/W/16/3159962) was for erection of one new detached dwelling. The Inspector also found the Council's evidence to be persuasive and that a contribution is justified by local circumstances. The fourth decision (APP/E0345/W/16/3157856) related to the proposed development a 2 bed detached dwelling. The inspector again found there to be local circumstances that indicated that the proposal should be determined in line with the development plan.
- 1.70 Three more recent appeal decisions have followed the decisions and analysis of the earlier decisions in dismissing appeals that failed to comply with Policy DM6. In the Henley Road appeal (APP/E0345/W/16/3160582), the Council's evidence was criticised for:
 - Making no reference to how many developments over 10 houses make a financial contribution to affordable housing;
 - Providing no information on potential contributions from committed sites that have planning permission but have not been implemented; and
 - Not taking into account future affordable housing contributions from potentially emerging sites arising from the new local plan.
- 1.71 The Inspector found that while the information provided by the Council may be lacking in some respects, "no evidence has been provided which would run counter to the Council's key claims on the notably high level of affordable housing need when comparison is made with other authorities, the higher than average housing prices when compared to income, the limitations placed on affordable housing contributions by an absence of greenfield sites and the important contribution small sites make in affordable housing provision." The Inspector went on to conclude that, "I consider the case above made by the Council to point strongly towards there being local circumstances to support seeking and affordable housing contribution in this case...as an exception to national policy."

- 1.72 While contributing little in substance to the Council's case, a brief response to the criticisms of the Council's evidence referred to in the decision letter is provided. The Council's polices are clear that affordable housing is, and will be, sought on all sites above 1 unit and for sites of 10 or more units. The target sought on such sites is a clearly stated percentage of the total provision depending on the number of units being provided. In line with national policy, and Policy DM6, exceptions to policy can be sought and applicants can submit evidence of viability to justify lower levels of provision. Viability is currently playing a big role in determining planning applications in Reading which is almost wholly dependent on the redevelopment or intensification of previously developed land with relatively high existing use values. Therefore, while the policy seeks a specific percentage provision, and the viability of this level of provision was tested through the Local Plan Examination in 2012, the reality is that large sites have generally not been providing this level of affordable housing.
- 1.73 In the same way, committed sites with planning permission are generally providing less than 30% affordable housing, mainly because viability considerations justify a lower level of provision. At 31st March 2016, Total hard commitments outstanding (Not Started + Under Construction) on sites of 10 or more dwellings amounted to around 3,030 units. Policy would suggest that around 900 units should be affordable but the reality is that these sites will provide significantly less that this figure.
- 1.74 The Council's Draft Local Plan was approved by the Council's Strategic Environment Planning and Transport Committee on 4th April 2017 and will be published for consultation at the end of April 2017. This plan proposes the allocation of a number of new sites including 2 "greenfield" sites. While new sites will be a potential source of additional affordable housing over the life of the plan up to 2036, few of those sites are likely to be developed in the short term and viability considerations will make achieving 30% affordable housing provision very challenging. Small sites of less than 10 dwellings will continue to play a major role in the supply of housing in Reading Borough.
- 1.75 Three appeal decisions have not supported the Council's case. In the first of these cases (Appeal Ref: APP/E0345/W/16/3154721 (Reading) -Oxford Road), the Inspector noted that no planning obligation for affordable housing provision was sought, as the application was to be refused for other reasons. However, he then went on to say that he therefore had no evidence as to how any planning obligations would be directly related to the development or fairly related in scale and kind, and thus meet the tests for planning obligations. He therefore didn't consider that the appeal could be dismissed on this ground. The council has accepted that it, possibly, did not provide sufficient information to the Inspector in this case.
- 1.76 Two decisions were received in March 2016 that did not support the Council's case. The decisions were as follows:
 - Appeal Ref: APP/E0345/W/16/3160994 (Reading) 26 Woods Road.
 - Appeal Ref: APP/E0345/W/16/3162360 (Reading) 153 Hemdean Road.

These decisions were made by the same Inspector and he was uncertain that the evidence before previous Inspectors (at the time of the decisions, the Council had received the first 4 favourable decisions), is fully reflective of the same as before

him. He was not satisfied that contributons were justificable and therefore the proposals would accord with national policy.

1.77 The Council has complained to the Inspectorate about these latter 2 decisions, in particular, the poor reasoning provided in these decisions in the face of other recent decisions that had supported the Council's case. As indicated at the beginning of this statement, the Council has received an apology from the Inspectorate, with an acceptance that that there were a number of shortcomings and failures in both the approach and judgement in these appeals. A copy of the letter from the Planning Inspectorate is attached as Appendix 3.

Other Appeal Decisions.

1.78 A number of other local authorities have also received appeal decisions accepting that their local circumstances outweigh the ministerial statement. In other appeals, we have referred to the Elmbridge Appeal Case (Appeal Ref: APP/K3606/W/16/ 3146699 - 26 The Avenue, Claygate, Esher, Surrey - copy attached separately). In this appeal decision, the Inspector, concluded that, "As a consequence, whilst the WMS carries considerable weight, I do not consider it outweighs the development plan in this instance given the acute and substantial need for affordable housing in the Borough and the importance of delivery through small sites towards this."

Conclusions.

- 1.79 The local circumstances related to the need for and provision of affordable housing within Reading Borough are extremely challenging. The level of need for affordable housing is very high as evidenced by a comparison of the OAN identified in the Berkshire SHMA and the HMA's for adjoining and nearby authorities. Reading also faces significant pressures in terms of the levels of homelessness and numbers on the housing waiting list. The area suffers high house prices, a high house price / earnings ratio and high rents, which mean that large numbers of households cannot and will not be able to afford market housing in the Borough. The various appeal decisions referred to in the evidence found the Council's case compelling and persuasive, justifying the Council in securing of a contribution towards affordable housing as an exception to national policy.
- 1.80 Those conditions exist in several other authorities in the South-East. However, Reading also faces huge challenges in providing any supply of affordable housing. Its urban nature, its very tight boundaries and the almost complete absence of greenfield sites means that there are no easy sites where policy compliant provision of affordable housing can be achieved. The consequent issues of cost of development and the high use values of such sites severely affects viability and thus suppresses the amounts of affordable housing that can be achieved from large sites. Changing government policy, which has particular implications for urban areas such as Reading is reducing, and will further reduce, the ability of the Council to achieve affordable housing from new development. Reading Borough Council also has its own severe limitations in making any direct provision of affordable housing in the face of very severe and high budgetary pressures.
- 1.81 The achievement of affordable housing from small sites is making a significant contribution to the provision of affordable housing in the face of exceptional need and supply issues. As evidenced by recent planning appeal decisions, the Council believes that local circumstances justify its continued operation of policies seeking

the provision of affordable housing on sites of 10 or less dwellings as an exception to the national policy. The Inspector is requested to dismiss the appeal in relation to this matter or, if minded to approve, grant permission subject to a unilateral undertaking to secure the provision of the agreed amount of contribution towards affordable housing.

Appendix 1. [NOTE - THIS APPENDIX SITS WITHIN APPENDIX 3 OF THE LOCAL PLAN BACKGROUND PAPER]

Interpretation of Affordable housing policies in the light of the Court of Appeal Judgement - Copy of Committee Report.

READING BOROUGH COUNCIL

REPORT BY DIRECTOR OF ENVIRONMENT

TO:	STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT COMMITTEE		
DATE:	13 th JULY 2016	AGEND	DA ITEM:
TITLE:	BERKSHIRE DISTRICT CO OF THE JUDGEMENT OF	OUNCIL AND REA	OCAL GOVERNMENT VS WEST DING BOROUGH COUNCIL: REPORT APPEAL AND IMPLICATIONS FOR FORDABLE HOUSING POLICIES
LEAD COUNCILLOR:	COUNCILLOR PAGE	PORTFOLIO:	STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT
SERVICE:	PLANNING	WARDS:	BOROUGH.
LEAD OFFICER:	KIARAN ROUGHAN STEVEN QUAYLE	TEL:	0118 9374530 0118 9372302
JOB TITLE:	PLANNING MANAGER PLANNING SOLICITOR	E-MAIL:	kiaran.roughan@reading.gov.uk
			Steven.quayle@reading.gov.uk

1. EXECUTIVE SUMMARY

- 1.1 Committee will recall that West Berkshire District Council and Reading Borough Council applied for a judicial review of the Secretary of State's Written Ministerial Statement (WMS) to Parliament on changes to national planning policy. Those changes sought to exempt developments of 10 or less dwellings from planning obligations for affordable housing and social infrastructure contributions and to introduce a new measure known as the Vacant Building Credit. The policy changes set out in the WMS were accompanied by amendments to the section on Section 106 agreements in the National Planning Practice Guidance ("NPPG").
- 1.2 The High Court handed down its judgement on the case on 31st July 2015. The High Court found in favour of the challenge by the local authorities and quashed the amendments to the NPPG. The Secretary of State appealed the judgement and the Court of Appeal has now quashed the decision of the High Court. This report provides a concise summary of the judgement, its implications for this Council and proposals for how the Council will implement its policies, in particular Policy DM6 of its Sites and Detailed Policies Document, in relation to this new national guidance.

2. RECOMMENDED ACTION

- 2.1 That the Committee notes the Judgement of the Court of Appeal; and
- 2.2 That Committee agrees the interpretation, set out at paragraphs 4.12 -4.25 of this report, of its adopted policies on the provision of affordable housing in the future determination of planning applications where Policy DM6, in particular, is relevant;
- 2.3 That Option 2, as set out in paragraph 4.21 below, be applied as the basis for determining planning applications where Policy DM6 is relevant.
- 2.4 That any application involving the application of the vacant building credit be considered on its own merits to assess whether local circumstances in a particular case justify not applying the vacant building credit as an exception to the national policy as indicated in paragraph 4.26 below.
- 2.5 That Committee agrees that a review of the Council's Community Infrastructure Levy Charging Schedule should be undertaken in due course in the light of significant impact that these changes are likely to have on the viability of development.

3. BACKGROUND AND ISSUES

- 3.1 On 28th November 2014, Brandon Lewis MP, in a Written Ministerial Statement (WMS) to Parliament, announced various changes to the government's planning policies. Subsequently, the NPPG was amended to take on board the changes announced in Parliament. In summary the main changes affecting Reading Borough were:
 - Due to the disproportionate burden of developer contributions on small scale developers, for sites of 10-units or less, and which have a maximum combined gross floor space of 1,000 square metres, affordable housing and tariff style contributions should not be sought. This will also apply to all residential annexes and extensions.
 - A financial credit, equivalent to the existing gross floorspace of any vacant buildings brought back into any lawful use or demolished for redevelopment, should be deducted from the calculation of any affordable housing contributions sought from relevant development schemes.

The WMS also referred to different thresholds for designated rural areas and Rural Exception Sites but, while the latter was of relevance to West Berkshire, it had no implications for Reading Borough.

3.2 The challenge by the two Local Planning Authorities to the WMS and the revised NPPG was heard in the High Court over 2 days on 29th and 30th April 2015 by Mr Justice Holgate. The 2 LPAs were represented by David Forsdick, QC and Alistair Mills.

- 4.2 The Court determined that, while the development plan is the starting-point for the decision-maker, it is not the law that greater weight is to be attached to it than to other material considerations. The Court also found that policy may overtake a development plan ("... a plan can become outdated and superseded by more recent guidance").
- 4.3 On Ground 1, The High Court Judge considered that the Secretary of State had failed to take into account certain "obviously material" considerations in developing the policy set out in the WMS. However the Court of Appeal decided the Secretary of State was not obliged to go further than he did into the specifics and in consequence is not to be faulted for a failure to have sufficient regard to relevant considerations in formulating the policy set out in the WMS.
- 4.4 The High Court judgement had concluded that the Secretary of State had failed to give sufficient reasons for his proposal so as to enable intelligent consideration and responses to be given. The judgement also concluded that the Secretary of State had failed to take the product of the consultation conscientiously into account. In particular he failed to consider evidence that the policy would have a substantial impact on affordable housing provision. The Court of Appeal found no criticism of the Minister both in terms of the fairness of the consultation and the adequacy of consideration to the responses to it.
- 4.5 The final ground revolved around the failure to undertake any Equality Impact Assessment prior to issuing of the new policy and the adequacy of the Assessment that was produced subsequent to the High Court Challenge. The High Court Judge had been very critical. However, the Court of Appeal considered that the judge was in error by his adoption of a more stringent and searching approach to the Equality Impact Assessment. They considered that compliance with the terms of Section 149 was achieved by what was done in this case.
- 4.6 While the appeal succeeded on all grounds, the decision provides some pertinent legal advice on the interpretation of ministerial policy. At paragraphs 16 -18, the decision sets out 2 principles:
 - The decision maker cannot blindly follow a pre-existing policy without considering anything said to persuade him that the case in hand is an exception;
 - a policy-maker (notably central government) is entitled to express his policy in unqualified terms. He is not required to spell out the legal fact that the application of the policy must allow for the possibility of exceptions.

The Court accepted the statement made on behalf of the Secretary of State that, *"local circumstances may justify lower (or no) thresholds as an exception to the national policy."* It is clear therefore that an LPA can seek to demonstrate that local circumstances can be used to justify an exception to the WMS and NPPG. This is an area that local authorities will be picking up and is discussed in more detail below.

4.7 Consideration has been given to seeking leave to appeal to the Supreme Court, the Court of Appeal having refused permission. However, West Berkshire and Reading Borough Council have now made the decision to not to appeal.

Implications of the Decision

- 4.8 In challenging the WMS, the Council has avoided granting planning permission for applications that did not provide affordable housing or contributions towards infrastructure provision. The Council has operated the Community Infrastructure Levy for all applications determined since April 2015 which means that the provisions in the Statement to exclude developments of 10 dwellings or less from Section 106 infrastructure payments has no effect in the Borough.
- 4.9 There are currently around 60 planning applications to which Policy DM6 on affordable housing applies. Many of these have been held in abeyance at the applicant's request pending the decision of the Court of Appeal. It is appreciated that applicants have been very patient in requesting that applications are held in abeyance. The Council will now need to make decisions on these applications. The WMS becomes a material consideration in the determination of these applications.
- 4.10 Committee should also be aware that a number of developments have been granted planning permission subject to the provision of affordable housing under a Section 106 Agreement, and which have not yet been implemented. In such cases, it is open to the applicant to resubmit an application to carry out the same or similar development and arguing that a Section 106 Agreement securing an affordable housing contribution is no longer necessary. Alternatively they can seek to discharge or vary their Section 106 obligation in existing Agreements.
- 4.11 As a result of the decision of the Court of Appeal, the Council now needs to set out how Policy DM6, in particular, will be interpreted in the light of the WMS and other material considerations, having considered the local circumstances. Policies on Affordable Housing will also need to be reviewed in the light of emerging policy based on the new measures introduced in the Housing and Planning Act 2016, in particular those measures requiring the provision of Starter Homes. It should be noted that the Council has already received 2 appeal decisions that have given the WMS significant weight, outweighing the need to make decisions in accordance with the Council's policies. As a result both appeals have been allowed without securing an affordable housing contribution.

Interpretation of Policy in the light of the Decision of the Court of Appeal

- 4.12 The decision of the Court of Appeal has reinstated the WMS and allowed the Secretary of State to issue new guidance in the NPPG which states that, "contributions for affordable housing and tariff style planning obligations should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm."
- 4.13 The Guidance also states that "Where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. Affordable housing contributions may be required for any increase in floorspace."
- 4.14 The assumption is that local authorities will follow WMS and the guidance. However, as indicated above, the Court of Appeal accepted that, *"local circumstances may justify lower (or no) thresholds as an exception to the national policy."* It is clear that an LPA can seek to demonstrate that local circumstances can be used to justify an exception to the WMS and NPPG. Officers are currently preparing a detailed case on behalf of the Council on these grounds.

- 4.15 Policy DM6 covers the provision of affordable housing on proposals of 1-14 dwellings. The Council adopted an Alteration to its Local Plan on 27th January 2015 (and in so doing has complied with all statutory requirements). This Alteration made minor changes to Policy DM6 in its Sites and Detailed Policies Document based on an up to date viability assessment. The Draft Alteration had been through Examination and the Inspector's final report was received on 17th December 2014. This was after the WMS which was made to Parliament on 28th November 2014. The Inspector found the Alteration to be sound and did not request any modifications. The Council can legitimately argue that Policy DM6, was approved and adopted subsequent to the WMS and this should give it considerable weight.
- 4.16 The policy seeks to assist the Council in meeting the requirements of the NPPF which state that:

"local planning authorities should...use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market <u>and affordable</u> <u>housing</u> in the housing market area, as far as is consistent with the policies set out in this Framework,...."

The Council considers that the policy is essential to assist in meeting the very high need for affordable housing in the Borough and in the wider area in compliance with the NPPF.

- 4.17 The Borough experiences exceptionally high levels of need for affordable housing. The Berkshire Strategic Housing Market Assessment (BSHMA) found that Reading had almost half of all households in the Western Berkshire Housing Market Area (HMA) that are currently in need of affordable housing and more than twice as many as either Bracknell Forest or Wokingham Borough. This is borne out by the Council's own register which exhibits high levels of homelessness and priority cases for affordable housing. In terms of forecasts, Reading also has significantly higher levels of newly forming households with housing need compared to the other authorities in the Western Berkshire HMA.
- 4.18 The BSHMA sets out the overall estimated level of Affordable Housing Need per annum for each of the Berkshire Authorities. This provides each authority's Objectively Assessed Need (OAN). For Reading Borough an affordable housing need of 406 dwellings per annum represents 58% of the overall housing need of 699 dwellings per annum. The corollary is that of the OAN of 699 dwellings, the Borough only needs to provide 293 market priced and market rented units per annum. All the rest should be affordable units as currently (pre-Housing and Planning Act 2016) defined. The situation becomes more complicated if we feed in Starter Homes, which are proposed to be defined as affordable housing, into the affordable housing demand and supply equation.
- 4.19 On the supply side, an average of around 155 new affordable housing units per year has been provided through planning agreements since 2001, partly bolstered in recent years by a small contribution from Policy DM6. Levels of affordable housing delivered in future years are currently looking likely to be less than this average. Reading has seen around 40-50 rented units per year sold through Right To Buy which will also soon apply to Housing Association stock. Policy DM6 was forecast to provide around 45 50 new affordable housing units per year, with sites of 10 units or less providing a high proportion of these numbers, certainly at least 25 30 units per year. As can be seen, Policy DM6 is intended to provide a significant proportion of the new affordable housing units in the Borough.

- 4.20 The OAN for affordable housing in Reading is exceptionally high. It is clear that the Council will have to consider all means of achieving affordable housing provision in the Borough if it is to deliver its OAN for affordable housing. The provision of affordable housing on small sites of 10 or less houses will be an essential part of this delivery. In the light of the very high OAN for affordable housing in the Borough, the very limited supply and the large impact should DM6 dwelling units not be provided, the Council contends that exceptional local circumstances justify lower (or no) thresholds as an exception to the national policy.
- 4.21 In that light of those conclusions, while recognising the change in government guidance, a number of options for the future interpretation of policy DM6 have been considered as follows:
 - 1) Continue to implement Policy DM6 as indicated in the Sites and Detailed Policies Document and as interpreted in the Affordable Housing Supplementary Planning Document.
 - 2) Implement Policy DM6 as above but excluding proposals that solely involve the conversion of an existing property, where the conversion involves the provision of 10 or less dwelling units (i.e. not HMOs), or the replacement of dwellings by the same number of replacement dwellings where there is no net increase.
 - Policy DM6 operates different requirements at different thresholds. The Council could decide not to seek provision for schemes below 5 units (i.e. 1-4 units). However, proposals of this size could contribute significant financial contributions despite the fact that only 10% affordable housing provision is being sought.
 - 4) The Council could decide not to seek provision for schemes below 10 units (i.e. 1-9 units). However, that would mean giving up a major part of the potential contribution that Policy DM6 can provide and is only one unit short of what the WMS requires.
- 4.22 The very high need for affordable housing implies a pressure to continue to apply the Council's existing policy in full as indicated by Option 1. However, the WMS talks about reducing "disproportionate" burdens on developers. While the work the Council has undertaken on viability of the development of small sites indicates that affordable housing provision in accordance with adopted policies does not impose disproportionate burdens on developers, some of the smaller developments provide limited financial contributions that it is difficult to argue will provide a meaningful contribution towards the provision of affordable housing. Officers are of the view that proposals involving conversions of buildings to provide residential uses, usually in the form of flats and replacement dwellings where there is no net increase in the number of dwellings (Option 2)) should no longer be subject to a requirement to provide a contribution towards affordable housing. As such, developments providing no or relatively little new floorspace are caught by the provisions of the vacant building credit (see below). Inevitably, because of the high existing use value of the existing floorspace, viability assessments often conclude that such developments can only contribute relatively small sums that would only make up a small proportion of the cost of providing an affordable unit. It is difficult to argue that such small developments will make any more than a very

small contribution. It is therefore questionable that it can now be successfully argued that seeking such small contributions justifies being considered as an exception to national policy.

- 4.23 Analysis of financial contributions, sought and agreed following the submission of a viability appraisal and negotiation, point to the fact that proposals involving net increases in dwellings of 1-4 units (Option 3) can provide quite sizeable contributions towards affordable housing provision. The provision of a single additional unit can provide tens of thousands of pounds that can make a significant contribution to providing units of affordable housing. It is therefore reasonable to argue that seeking such contributions justify being considered as an exception to national policy. Obviously that argument is more reasonable to justify in relation to larger proposals involving 5 or more units.
- 4.24 Having considered the above options, officers recommend that option 2 be used as the basis for determining planning applications where Policy DM6 is relevant particularly given the recent appeal decisions attached.
- 4.25 The financial credit referred to in the WMS and in the changes to the NPPG, will also have a significant impact on affordable housing provision in Reading. Reading Borough is almost wholly urban and relies on previously developed land for nearly all its new development. Under its adopted policies, the Council seeks affordable housing on the whole scheme and then considers any viability evidence that points to reducing the requirements. The change in government policy now introduces a financial credit to count against the affordable housing requirement. Essentially, any existing floorspace on a site will be deducted from the total new floorspace of the development before any calculation of the affordable housing requirement is Perversely, in accordance with the NPPF and existing local authority made. policies, applicants will also be able to continue to argue that the viability of a scheme cannot support even the new lower level of provision. This mechanism will have an impact on the provision of affordable housing but that impact is unclear. Officers recommend that, for the moment, any application involving the application of the vacant building credit be considered on its own merits to assess whether local circumstances in a particular case would justify not applying the vacant building credit as an exception to the national policy.
- 4.26 The Court of Appeal decision, and the measures coming out of the Housing and Planning Act 2016, will have significant implications for the viability of developments on small sites. It would therefore be prudent for the Council to consider reviewing its Community Infrastructure Levy Charging Schedule in due course in the light of the significant impact that these changes are likely to have on the viability of development in the Borough.
- 4.27 The Council is currently developing a replacement Local Plan which will provide an opportunity to review and update its adopted Policies. Any revisions to Policy DM6 will need to take account of the Government's position in relation to thresholds and starter homes as well as the local housing circumstances in the Borough. A robust case to continue to secure affordable housing contributions from development will be made as part of this process.

5. CONTRIBUTION TO STRATEGIC AIMS

- 5.1 The Planning Service contributes to the Council's strategic aims in terms of:
 - Seeking to meet the 2015 -18 Corporate Plan objective for "Keeping the town clean, safe, green and active."
 - Seeking to meet the 2015 -18 Corporate Plan objective for "Providing homes for those in most need."
 - Seeking to meet the 2015 -18 Corporate Plan objective for "Providing infrastructure to support the economy"

The matters referred to in this report will have an impact on the Council's ability to achieve the provision of affordable housing to meet the need for such housing in the Borough.

6. COMMUNITY ENGAGEMENT AND INFORMATION

6.1 The High Court judgement had highlighted the importance of ensuring that consultation documentation provides sufficient reasons for the proposals and that the product of, and responses to, consultation must be taken conscientiously into account before finalising policy. However, this is substantially watered down, certainly in relation to government policy in the light of the decision of the Court of Appeal

7 EQUALITY IMPACT ASSESSMENT

- 7.1 Where appropriate the Council must have regard to its duties under the Equality Act 2010, Section 149, to have due regard to the need to—
 - eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 7.2 The Court of Appeal judgement appears to play down the importance of carrying out an Equality Impact Assessment as part of the development of policy and did not sanction the publication of a policy in the absence of such an assessment. However, it does not take away the clear need to undertake EQIA before finalising policy so that any policy is informed by such an assessment.

8. LEGAL IMPLICATIONS

8.1 These are dealt with in the Report.

9. FINANCIAL IMPLICATIONS

- 9.1 Costs have been awarded against the challenging councils by the Court of Appeal. There will, therefore, be financial implications resulting from judicial review. The Council's share of the costs of taking the case through the 2 court cases amount to nearly £40,000. A further £20,000 is now to be paid towards the costs of the Secretary of State.
- 9.2 Indirectly, the challenge has enabled the Council and other local authorities to benefit from the result of the High Court Challenge. The Council has been able to apply existing development plan policies that seek direct provision, or contributions towards the provision, of affordable housing and infrastructure within the Borough. Since the date of the Written Ministerial Statement, it is estimated that agreements have been signed for the provision of 3 affordable housing units and contributions of £1.2m towards affordable housing. In addition, as indicated in the main report, no planning application involving the provision of 10 or less dwellings has been approved to which the Community Infrastructure Levy will not apply. If the challenge had not been made, the Council would have had to approve planning applications before the introduction of the Community Infrastructure Levy that could not have been required to make any contributions towards infrastructure provision via a Section 106 agreement.
- 9.3 The changes now introduced as a result of the Court of Appeal Decision could have a significant impact on the provision of affordable housing and/or affordable housing contributions.
- 9.4 It is likely that the Council's position on this matter will be challenged through the planning appeal process. In the event that an appeal is made, the Council will submit a detailed case to the Inspectorate to justify its position. Should the Inspectorate find the Council's case to be unconvincing officers will need to reconsider the position taken in relation to Policy DM6. The Council can award costs against the Council should it consider that the Council has acted unreasonably.

10. BACKGROUND PAPERS

Approved Judgements in Case No: CO/76/2015:

High Court

West Berkshire District Council and Reading Borough Council - and - Department for Communities and Local Government, July 2015.

http://www.bailii.org/ew/cases/EWHC/Admin/2015/2222.html

Court of Appeal

Department for Communities and Local Government, -and- West Berkshire District Council and Reading Borough Council, May 2016.

http://www.bailii.org/ew/cases/EWCA/Civ/2016/441.html

Appendix 2: Relevant National Planning Policy

[NOTE - THIS APPENDIX SITS WITHIN APPENDIX 3 OF THE LOCAL PLAN BACKGROUND PAPER]

National Planning Policy Framework (NPPF)

Paragraph 47 of the NPPF indicates that:

"To boost significantly the supply of housing, local planning authorities should:... use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area,..."

Paragraph 50 of the NPPF goes on to indicate that:

"where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.

Paragraph 159 of the NPPF indicates that:

"Local planning authorities should have a clear understanding of housing needs in their area. They should:

- prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:
 - meets household and population projections, taking account of migration and demographic change;
 - addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
- caters for housing demand and the scale of housing supply necessary to meet this demand;
 - prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period."

Paragraph 173 tells local authorities:

"To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing,..."

need to be taken into account. Paragraph 174 indicates that:

"Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing..."

Annex 2 of the NPPF sets out a definition of affordable housing. Interestingly it states that:

"Homes that do not meet the above definition of affordable housing, such as "low cost market" housing, may not be considered as affordable housing for planning purposes."

The Housing and Planning Act 2016 specifically defines "Starter Homes," that no one can define as anything other than "low cost market" housing, as affordable housing. The definition in Annex 2 of the NPPF will obviously have to be amended if Starter Homes are brought in as currently intended.

National Planning Policy Guidance (NPPG)

The NPPG contains various references to affordable housing and it is not intended to review them all here. Nevertheless, in line with the policy contained in the NPPF, NPPG requires local authorities to take account of the need for affordable housing in the pages on Housing and economic development needs assessments:

(http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/methodology-assessing-housing-need/).

Pages on Local Plans require local authorities to plan for the identified need for affordable housing.

National planning policy therefore requires local planning authorities to plan for the identified need for affordable housing in their areas. Unfortunately, various changes to the law as well as national policy since the NPPF was published in 2012, including the Housing and Planning Act 2016, and the November 2014 Written Ministerial Statement, have made it, and are increasingly making it difficult for local planning authorities to demonstrate that they can plan for such identified need.

Housing and Planning Act 2016

Chapter 1 of the Act relates to Starter Homes. Section 4 requires that, "An English planning authority must carry out its relevant planning functions with a view to promoting the supply of starter homes in England." Section 5 provides that regulations provide that an English planning authority may only grant planning permission for a residential development of a specified description if the starter homes requirement is met. Recent consultation on draft regulations have indicated that all developments of 10 or more dwellings will provide 20% of dwellings as starter homes. Subsection 5(5) suggests that starter homes will be secured by way of a planning agreement. There are provisions for monitoring and for ensuring compliance.

Section 159 of the act is headed Planning Obligations and Affordable Housing. This inserts a new subsection into the Town and Country Planning Act 1990: 106ZB Enforceability of planning obligations regarding affordable housing. This section enables the Secretary of State to impose restrictions or conditions on the enforceability of planning obligations entered into with regard to the provision of affordable housing or prescribed descriptions of affordable housing. Regulations under this section may make consequential, supplementary, incidental, transitional or saving provision or may impose different restrictions or conditions (or none) depending on the size, scale or nature of the site or the proposed development to which any planning obligations would relate (without prejudice to the generality of section 333(2A)).

Subsection 159(1)(4) stipulates that, "affordable housing" means new dwellings in England that are starter homes within the meaning of Chapter 1 of Part 1 of the Housing and Planning Act 2016. Subsection 159 (1)(6) provides for: "The Secretary of State may by regulations amend this section so as to modify the definition of "affordable housing"." Subsection 159 (2) indicates that any regulations under Subsection 106ZB must be approved by both houses of parliament.

The Act therefore includes Starter Homes within the definition of Affordable Housing. Not only that, it requires that a specified amount (20% under the draft guidance) should be provided before any other form of affordable housing is provided.

APPENDIX 3: Comparison of levels of Affordable Housing need as a proportion of OAN in adjoining areas where a recent SHMA has been undertaken.

[NOTE - THIS APPENDIX SITS WITHIN APPENDIX 3 OF THE LOCAL PLAN BACKGROUND PAPER]

Oxfordshire

The relevant tables are as follows:

Table 55: Assessed Affordable Housing Need (2013-31) - including Development Pipeline

	Gross Current Need	Supply of Affordable Housing in Developm ent Pipeline	Net Backlog	Annual Newly- Arising Need	Annual Supply through Relets	Net Need per Annum
Cherwell	793	2602	-1809	644	280	264
Oxford	2,003	722	1281	1376	459	988
South Oxon	668	1019	-351	610	260	331
VoWH	508	1054	-546	523	278	215
West Oxon	510	292	218	462	217	257
County	4,483	5689	-1208	3615	1494	2054

Table 90: Conclusions regarding Overall Housing Need

Housing Needed per Year (2011-31)	A. Demographic Base + Shortfall	B. To Support Committed Economic Growth	C. To Meet Affordable Housing Need in Full	D. Range: Housing Need per Year	E. Midpoint of Range
Cherwell	682	1142	1233	1090-1190	1140
Oxford	782	700	2058	1200 - 1600	1400
South Oxfordshire	552	749	965	725-825	775
Vale of White Horse	508	1028	683	1028	1028
West Oxfordshire	541	661	685	635-685	660
Oxfordshire	3064	4280	5624	4678 - 5328	5003

These provide the following comparison of proportion of OAN that is need for affordable housing

Authority	OAN	Affordable Housing Need	Proportion of OAN that is need for affordable
Reading	699	406	58.08
Cherwell	1140	264	23.16

Oxford	1400	998	71.29
South Oxfordshire	775	331	42.71
Vale of White Horse	1028	215	20.91
West Oxfordshire	660	257	38.94
Oxfordshire	5003	2054	41.06
BHMA	4870	2537	52.09

Oxford City suffers high levels of affordable housing need similar to the tightly bounded urban district/Borough s in Berkshire (Reading and Slough). However the remaining more rural districts exhibit rather less demanding levels of need compared to Reading.

Buckinghamshire

The SHMA undertaken by ORS/Atkins on a different basis but indicates a significantly lower proportion of need for affordable housing in relation to the overall OAN compared to Berkshire as a whole and Reading in particular. Proportions rarely reach 20%

Figure 127: Overall housing need and growth of institutional population by LA (Note: Figures relate to individual Local Authority Plan periods which differ across the HMA)

	Aylesbury Vale	Chiltern	South Bucks	Wycombe	TOTAL
Overall Housing Need	Plan period 2013-33	Plan period 2014-36	Plan period 2014-36	Plan period 2013-33	20-year period 2013-33
Market Housing	16,700	6,200	6,200	11,700	39,500
Affordable Housing	4,600	1,100	1,600	3,400	10,500
TOTAL	21,300	7,300	7,800	15,100	50,000
Increase in institutional population aged 75+	1,160	460	520	670	2,700

Authority	OAN	Affordable Housing Need	Proportion of OAN that is need for affordable
Reading	699	406	58.08
Aylesbury Vale	1065	230	21.60
Chiltern	332	50	15.06
South Bucks	355	73	20.56
Wycombe	755	170	22.52
Bucks HMA Total	2500	525	21.00

BHMA	4870	2537	52.09

As can be seen, in comparison with other authorities in Berkshire and in Oxfordshire and Buckinghamshire, Hampshire has divided itself into different market areas each undertaking their own HMA at different times and to different methodologies. For example, the Hart, Rushmoor and Surrey Heath Strategic Housing Market Assessment (December 2004) sets out an OAN and analyses the need for affordable housing but doesn't provide a separate annual OAN for affordable housing. It indicates an overall need for the whole area as 35-40%. The table below sets out the OAN and affordable housing proportion for a number of authorities in Hampshire. The South Hampshire HMA, which includes the Portsmouth HMA, Southampton HMA and Isle of Wight HMA, has recently been updated but uses a different methodology which makes comparison difficult, so they have not been included in this comparison. Compared to the nearby Hampshire authorities, Reading exhibits significantly higher levels of need for affordable housing.

Authority	OAN	Affordable Housing Need	Proportion of OAN that is need for affordable
Reading	699	406	58.08
Basingstoke and Deane	850	318	37.41
East Hampshire	520-610	219-275	42.11-45.08

Hart Rushmoor and Surrey Heath

This HMA provided a generalised figure for the proportion of OAN that is need for affordable housing.

Authority	OAN	Affordable Housing Need	Proportion of OAN that is need for affordable
Reading	699	406	58.08
Hart	370		35-40
Rushmoor	470		35-40
Surrey Heath	340		35-40

West Surrey

There has not been a recent HMA for the East Surrey HMA area although one is in the course of preparation. The last HMA for his area was the 2007 study. There is therefore no comparison for this area. The West Surrey HMA was completed during

2015. It identified an OAN for the HMA which comprises Guildford, Waverly and Woking as follows:

Table 76: Housing Need per Annum (2013-33) based on 2012-SNPP and 2012-based headship rates

	Guildford	Waverley	Woking	West Surrey
Households 2013	55,351	4 9,691	39,757	144,798
Households 2033	65,279	59,108	46,380	170,767
Change in households	9,928	9,417	6,623	25,969
Households Per annum	496	471	331	1,298
Dwellings (per annum)	517	493	341	1,352

Table 78: Annual Need from Households Requiring Support

Area	Net Need
Guildford	455
Waverley	314
Woking	375
West Surrey	1,144

Authority	Households	OAN	Affordable Housing Need	Proportion of OAN that is need for affordable
Reading		699	406	58.08
Guildford	55,351	517	455	88
Waverley	49,691	493	314	63
Woking	39,757	341	375	110
WSHMA	144,798	1,352	1,144	84.6

As can be seen in this comparison, West Surrey does experience very high affordable housing need as a proportion of the identified OAN.

Appendix 4 Response from PINS to RBC Complaint.

[NOTE - THIS APPENDIX SITS WITHIN APPENDIX 3 OF THE LOCAL PLAN BACKGROUND PAPER]



Room 3B Eagle Wing Temple Quay House 2 The Square Bristol, BS1 6PN	Direct Line: Customer Services: e-mail:	0303 444 5493 0303 444 5000 chris.pritchard@pins.gsi.gov.uk
Kiaran Roughan Planning Manager	Your Ref:	
Reading Borough Council	Our Ref:	APP/E0345/W/16/3160994 APP/E0345/W/16/3162360
Sent via e-mail	Date:	22 June 2017

Dear Mr Roughan

APPEAL BY MR M & MRS G GARG – LAND ADJACENT 26 WOODS ROAD, CAVERSHAM, READING, RG4 6NA

APPEAL BY MR M CHAMBERLAIN – 153 HEMDEAN ROAD, CAVERSHAM, RG4 7QU

Thank you for your letter of 6 March, regarding the above planning appeals. Your letter has been passed to me for reply as a member of the Customer Quality team whose role is to deal with post appeal decision issues and correspondence. Please accept my apologies for the time taken to respond.

Careful consideration has been given to your concerns regarding the reasoning in these decisions in relation to the provision of affordable housing and inconsistency between Inspectors in determining appeals on small site affordable housing provision. In order to inform my investigation of these matters I have sought feedback from the Inspector together with the views of our Director of Inspectors.

As you will be aware planning legislation and case law require that each individual appeal is determined on its own planning merits and on the basis of the evidence put before the Inspector. Circumstances will vary between similar proposals and the balance of argument will differ so resulting in different appeal outcomes. The law does not require all decisions to be "consistent", rather that, where proposals are similar, explanations are given for the differences. Case law does require the explanation of differences with other Inspectors' decisions and unfortunately, in these appeals, the Inspector rather than do that or explain that he cannot do so because he has not seen the relevant evidence, appears to makes his own assertions. This was a failure to demonstrate that a relevant material consideration was taken into account.

It is further acknowledged there is a lack of reasoning by Inspector in these appeals. His considerations appear to have incorrectly not started with the development plan and then considered the Written Ministerial Statement of 28 November 2015 (WMS) as a material consideration. Rather, despite acknowledging the development plan



policies in the decision letters, in practice he has used the WMS as the starting point of his considerations.

This was not an appropriate approach as the effect of the WMS was not to reduce the weight that should be given to the statutory development plan, or automatically to outweigh relevant development plan policies. Local policies still have weight as the starting point from S.38(6) of the Planning and Compulsory Purchase Act and the WMS comes into play as a material consideration which post-dates the plan, and which has to be balanced against the plan and the evidence base supporting the LPA's application of the policy. The decision maker therefore has discretion in applying his or her judgment as to where the balance should lie, drawing on the evidence presented.

The correct approach, if minded to allow an appeal in such circumstances, would be for an Inspector to start with the development plan and any evidence presented by the LPA supporting the need for an affordable housing contribution, establish whether the proposal is in conflict with those policies if no contribution is provided for, and, if there is conflict, only then go on to address the weight to be attached to the WMS as a national policy that post-dates the development plan policies.

With the above in mind, it is fully accepted that there are regrettably failures in both approach and judgement in these appeals. Please accept my sincere apologies on behalf of the Planning Inspectorate that these appeal decisions fall short of expected standards and for any subsequent inconvenience caused. We do aim to take forward lessons such as this constructively. The Inspector and his manager have been informed that your complaints have been upheld and in moving forward, I can advise our internal Inspector guidance is in the process of being updated and strengthened to ensure, as far as a possible, that such errors do not occur again.

Yours sincerely

Chris Tritchard

Customer Quality

Appendix 5 [NOTE - THIS APPENDIX SITS WITHIN APPENDIX 3 OF THE LOCAL PLAN BACKGROUND PAPER]

LIST OF RELEVANT SMALL SITE AFFORDABLE HOUSING APPEAL DECISIONS

APPEAL REF	ADDRESS	RBC REF	DATE DETERMINED	ALLOWED/ DISMISSED?	MAIN ISSUES ADDRESSED Affordable Housing DM6 (not	COMMENT
APP/E0345/15/3141752	The Pond House, Oxford Rd	150539	25/07/2016	ALLOWED	supported), Highway Safety	Case not submitted
APP/E0345/W/16/3149180 APP/E0345/W/16/3153661	51 Cressingham Road 17 St Barnabas Rd Emmer Green	152016 151893	21/10/2016 02/12/2016	DISMISSED	Character, Highway Safety, Wheatcroft Principles Affordable Housing DM6, Character, Spaciousness, Privacy	Affordable Housing reason withdrawn
APP/E0345/W/16/3160582	79 Henley Road	150151	05/12/2016	DISMISSED	Affordable Housing DM6	
APP/E0345/W/16/3154971	51 Cressingham Road	160820	16/01/2017	DISMISSED	Affordable Housing DM6, Character	
APP/E0345/W/16/3159962	8 Thornton Road	160460	18/01/2017	DISMISSED	Affordable Housing DM6, Character Affordable Housing DM6, Character,	
APP/E0345/W/16/3157856	1 The Ridings, Emmer Green Land at Oxford Road,	151773	19/01/2017	DISMISSED	trees Affordable Housing DM6, Character,	
APP/E0345/W/16/3154721	Tilehurst 126, Westwood Road,	150136	30/01/2017	DISMISSED	biodiversity Affordable Housing DM6, Character,	
APP/E0345/W/16/3155586	Tilehurst,	160083	06/02/2017	DISMISSED	amenity, biodiversity Affordable Housing DM6 (not supported) Character, living	
APP/E0345/W/16/3160994	26 Woods Road, Caversham 153 Hemdean Road,	160059	17/02/2017	ALLOWED	conditions. Affordable Housing DM6 (not	See PINS Complaint
APP/E0345/W/16/3162360	Caversham	160088	20/02/2017	ALLOWED	supported) Character. Affordable Housing DM6, Character,	See PINS Complaint
APP/E0345/W/16/3162427	171 Blagdon Road	160752	13/03/2017	DISMISSED	Affordable Housing DMG, Character, Affordable Housing DM6, Character, Spaciousness, Parking, Wheatcroft	
APP/E0345/W/16/3161485	Gloucester Court	160482	13/03/2017	DISMISSED	Principles Affordable Housing DM6, Character,	
PP/E0345/W/17/3168768	65 Peppard Road, Caversham	160527	12/06/2017	DISMISSED	biodiversity	
APP/E0345/W/16/3161384	37 Hilcot Road, Reading RG30	150238	12/07/2017	DISMISSED	Affordable Housing DM6	

	2SX					
APP/E0345/W/16/3154971	51 Cressingham Road	160820	16/01/2017	DISMISSED	Affordable Housing DM6, Character Affordable Housing DM6 and whether the submitted Unilateral Undertaking	Affordable housing
APP/E0345/W/17/3173270	Rear of 52 Norcot Road	151144	17/08/2017	ALLOWED	was adequate.	provided by UU
APP/E0345/W/17/3174759	42 Bulmershe Road	161665	21/09/2017	DISMISSED	Affordable Housing DM6, Character, Living conditions, Highway Safety	
PP/E0345/W/17/3174559	54 Lyndhurst Road, Tilehurst	161664	06/10/2017	DISMISSED	Affordable Housing DM6, Character, Living conditions, Highway Safety	
APP/E0345/W/17/3176746	85 Ambrook Road, Whitely	170231	27/10/2017	DISMISSED	Affordable Housing DM6, Character, Living conditions, Highway Safety	

APPENDIX 4: NEW DRAFT LONDON PLAN POLICY H13 (NOVEMBER 2017)

Draft New London Plan

December 2017

- A. To recognise that the Build to Rent development model differs from a traditional for sale scheme and the potential role it can play in accelerating delivery, where a development meets the criteria set out below, the affordable housing offer can be solely Discounted Market Rent at a genuinely affordable rent, preferably London Living Rent level. Affordable housing should be secured in perpetuity.
- B. To qualify as a Build to Rent scheme within the context of this policy, all the following criteria must be met:
 - the development, or block or phase within the development has at least 50 units[53]
 - the homes are held as Build to Rent under a covenant for at least 15 years[54]
 - 3. a clawback mechanism is in place to recoup additional affordable housing contributions in the event of the covenant being broken
 - 4. all the units are self-contained and let separately
 - 5. there is unified ownership and unified management of the development
 - 6. longer tenancies (three years or more) are available to all tenants. These should have break clauses for renters, which allow the tenant to end the tenancy with a month's notice any time after the first six months
 - the scheme offers rent certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases which should always be formulalinked
 - 8. there is on-site management, this does not necessarily mean full-time dedicated on-site staff, but all schemes need to have systems for prompt resolution of issues and some daily on-site presence
 - 9. providers have a complaints procedure in place and are a member of a recognised ombudsman scheme
 - 10. providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.
- C. For Build to Rent schemes to follow the Fast Track Route they must deliver at least 35 per cent affordable housing, of which at least 30 per cent should be at London Living Rent Level, with the remainder being at a range of discounts below market rent to be agreed with the borough and/or the Mayor where relevant. Schemes must also meet all other requirements of part C of Policy H6 Threshold approach to applications. This threshold and affordable housing tenure

split, will be reviewed and if necessary updated in 2021, through Supplementary Planning Guidance.

- D. Where the requirements of C above are not met, schemes must follow the Viability Tested Route set out in Policy H6. Viability assessments on such schemes should take account of the differences between Build to Rent and Build for Sale development and be undertaken in line with the Affordable Housing and Viability SPG.
- E. On schemes that propose a proportion of homes as Build to Rent and a proportion for sale to the market, part A of this policy will only be suitable for the Build to Rent element. The scheme should be assessed as a whole, with affordable housing calculated as a proportion of total habitable rooms across the scheme.

[53] Boroughs may set their own thresholds to reflect local housing market circumstances and affordable housing need. However, it is important that where a lower threshold is set, Build to Rent schemes must still operate according to the stipulations in this guidance in order to qualify for the application of the Built to Rent policy.

[54] Covenant periods are expected to increase as the market matures.

<u>4.13.1</u>

The planning system should take a **positive approach to the Build to Rent sector** to enable it to better contribute to the delivery of new homes. Build to Rent developments can make a positive contribution to increasing housing supply and are beneficial in a number of ways. They can:

- attract investment into London's housing market that otherwise would not exist
- accelerate delivery on individual sites as they are less prone to 'absorption constraints'[55] on build-out rates
- deliver more readily across the housing market cycle as they are less impacted by house price downturns
- provide a more consistent and at-scale demand for off-site manufacture
- offer longer-term tenancies and more certainty over long-term availability
- ensure a commitment to, and investment in, place-making through single ownership
- provide better management standards and better quality homes than much of the mainstream private rented sector.

[55] The absorption rate is how long it will take a home to sell or be let for the identified price. The main constraint on absorption is the number of buyers or renters in the market willing (or able) to buy or rent the property at the identified price.

<u>4.13.2</u>

The **Build to Rent** Policy has been developed in recognition of the fact that Build to Rent operates a different model to Build for Sale. Build to Rent relies on income through rent over a number of years, rather than an upfront return on sales (this is often referred to as the 'distinct economics' of the sector). Because of this, in some circumstances Build to Rent may not be able to compete for land on an equal footing with speculative Build for Sale, as it may generate lower initial land values. Longer term however, Build to Rent is an attractive offer to institutional investors. This policy provides a specific approach to the affordable housing offer, where the aim is to maintain the integrity of the Build to Rent development, with unified ownership and management of all the homes

<u>4.13.3</u>

Where a developer is proposing a Build to Rent development which meets the definition set out in Policy H13 Build to Rent, the affordable housing offer can be entirely **Discounted Market Rent** (DMR), managed by the Build to Rent provider and delivered without grant, i.e. entirely through planning gain. As it is not a requirement to be a local authority or a Registered Provider to deliver or manage intermediate rented homes that are delivered without grant, these units can be owned and/or managed by Build to Rent landlords themselves. DMR units should be fully integrated into the development with no differences between DMR and market units.

<u>4.13.4</u>

The Mayor's strong preference is for DMR homes to be let at **London Living Rent** level, to ensure city-wide consistency in approach. Unlike other DMR products, London Living Rent has an advantage in that it has a London-wide electoral mandate, can be consistently understood and applied across London, can earn the public's trust as being genuinely affordable, and will be backed by the GLA who will uprate it every year.

<u>4.13.5</u>

A threshold level of affordable housing has been introduced to provide an opportunity for Built to Rent schemes to take advantage of the Fast Track Route offered to Build for Sale schemes.

<u>4.13.6</u>

To follow the **Fast Track Route** at least 30 per cent of the affordable housing must be let at London Living Rent levels. The remainder should be provided at a range of discounts below market rent based on local need to be agreed with the borough and Mayor where relevant, for example with half of remaining units at 50 per cent and half at 70 per cent of market rents.

<u>4.13.7</u>

Proposals that do not provide 35 per cent affordable housing at the required discount to market rents or that do not meet the criteria of part C of Policy H6 Threshold approach to applications will be subject to the **Viability Tested Route** under part E of Policy H6 Threshold approach to applications.

<u>4.13.8</u>

In all cases the borough must ensure that the DMR units fully meet the definition of intermediate housing and are affordable to those eligible for intermediate rented housing in London, taking into account the Mayor's guidance on this issue.

<u>4.13.9</u>

Schemes that do not meet the Build to Rent definition set out in Policy H13 Build to Rent and that do not provide a 15-year covenant or a clawback agreement in line with the Mayor's

guidance will not qualify for the Build to Rent policy approach. These will be treated as **Build for Sale** developments for the purposes of determining affordable housing requirements.

<u>4.13.10</u>

Schemes that qualify for the Fast Track Route will not need to provide a full viability assessment but will be subject the 15-year covenant and clawback given the Build to Rent policy approach to affordable housing[56].

[56] A valuation of the market and affordable units must be included within the S106 agreement to enable the level of clawback to be calculated in the event that the covenant is broken.

<u>4.13.11</u>

The majority of DMR products, where they meet the requirements of the Community Infrastructure Levy (CIL) regulations qualify for **mandatory CIL relief**[57]. [57] The Community Infrastructure Levy (Amendment) Regulation 2015 – amendment to Part 6 – exemptions and reliefs.

<u>4.13.12</u>

Further **support for Build to Rent** can be given by boroughs through:

- allocating specific sites for Build to Rent or requiring an element of Build to Rent on larger sites in order to accelerate build out of the site
- encouraging long-term institutional investment, working with the GLA and partners
- supporting institutional investment on public land, including exploring the use of joint ventures or deferred receipts.

<u>4.13.13</u>

Further guidance on Build to Rent schemes can be found in the Mayor's Affordable Housing and Viability SPG.

APPENDIX 5: SOUTHWARK LOCAL PLAN PREFERRED OPTIONS JUNE 2017 AMENDED POLICY DM4 - PRIVATE RENTED HOMES

Planning permission will be granted for self-contained, private rented homes which:

1 Provide more than 100 homes; and

2 Provide a high standard of security and professional on-site management; and

3 Provide for a mix of unit sizes to reflect local need for rented property; and

4 Meet the same standards of design required for build-to-sale homes; and

5 Are secured in perpetuity for the rental market and for a minimum 30 year term; and

6 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 intenancy rent increases agreed in advance; and

7 Meet Southwark's Private Rent Standard; and

8 Provide affordable homes in accordance with DM1.1; or

9 Provide at least 35%¹ affordable homes, as set out below, subject to viability.

Affordable discount market rent homes must be provided in perpetuity;

Discount market rent homes - A minimum 35%

Social rent equivalent - A minimum 12% (34%)

Affordable rent capped at London Living Rent equivalent - A minimum 18% (52%)

Affordable rent for household incomes between £60,000 and £90,000 per year - A minimum 5% (14%)

¹Subject to further viability testing

10. Affordable discount market rent homes at social rent equivalent must be allocated to eligible households on Southwark's social housing waiting list. All other discounted market rent homes must be allocated to eligible households on Southwark's intermediate housing waiting list.

11 Discount market rent homes must be provided in perpetuity.

12 Where any private rented homes are sold from the private rented sector within 30 years a penalty charge towards affordable housing will be triggered.

Reasons

We recognise that the private rented sector (PRS) meets the housing needs of residents who cannot afford to or do not want to buy private homes in Southwark. Between 2001 and 2011, the PRS in Southwark increased from 15,932 to 29,995 households. In 2011 the PRS represented 24.9% of a total 120,422 households in the borough, up from 15.1% of a

total 105,806 households in 2001. Private renting households often live in some of the worst quality, poorly managed accommodation. Furthermore, the majority of private renting households have very limited security of tenure which is particularly damaging for households with children and some renters face arbitrary evictions and unjustified rent increases. The PRS has the potential to increase Southwark's housing supply because developers have fewer concerns about the rate at which the market can absorb new homes.

The PRS also benefits the local and regional economy as it enables greater household mobility. We want to encourage a private rented sector which provides high quality, professionally managed accommodation and a greater level of security for tenants than that which is offered by much of the current PRS market. We will support institutional investment in the sector where benefits are secured for residents through agreement. Southwark's Private Rent Standard is a code of good practice which sets out similar expectations to a competent rental property manager who acts to protect the value of their investment and enhance its income stream.

We want affordable homes provided as part of a private rented scheme to benefit from the same quality and management advantages as the private rented homes provided for the open market. As such, affordable homes should be indistinguishable from private rented homes and should provide a range of discounted rents to reflect local affordability needs across the borough.

New Southwark Plan: Proposed Submission Version

Southwark Local Plan, Preferred Option June 2017

Policy P4 - Private Rented Homes

Private rented homes

New self-contained, private rented homes in developments providing more than 100 homes must:

1.1 Provide security and professional management for the homes; and

1.2 Provide a mix of housing sizes, reflecting local need for rented property are provided; and

1.3 Provide the same design standards required for build-for-sale homes; and

1.4 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

1.5 Meet Southwark's Private Rent Standard; and

1.6 Be secured for the rental market for a minimum 30 year term. Where any private rented homes are sold from the private rented sector within 30 years this will trigger a clawback mechanism resulting in a penalty charge towards affordable housing; and

1.7 Provide affordable homes in accordance with P1 or Table 3, subject to viability. Where the provision of private rented homes generates a higher development value than if the homes were built for sale, the minimum affordable housing requirement will increase to the point where there is no financial benefit to providing private rented homes over built for sale homes.

1.8 Be subject to a viability review to increase the number of and/or the affordability of affordable homes where an improvement in scheme viability is demonstrated between the grant of planning permission and the time of the review.

2 Discount market rent homes at social rent equivalent must be allocated to households on Southwark's social housing waiting list. All other discounted market rent homes must be allocated to households on Southwark's Intermediate Housing List.

Table 3: Affordable housing requirement option on qualifying private rented homes scheme

Market homes	Affordable homes					
		A minimum of 35%				
Up to 65%	Social rent equivalent	Affordable rent capped at London Living Rent equivalent	Affordable rent for household incomes between £60,000 and £90,000 per year			
	A minimum of 12% (34%)	A minimum of 18% (52%)	A minimum of 5% (14%)			

Reasons

We recognise that the private rented sector meets the housing needs of residents who cannot afford to, or do not want to buy private homes in Southwark. Between 2001 and 2011, the private rented sector in Southwark increased from 15,932 to 29,995 households. In 2011 the private rented sector represented 24.9% of a total 120,422 households, up from 15.1% of a total 105,806 households in 2001. Private renting households often live in some of the worst quality, poorly managed accommodation. Furthermore, the majority of private renting households have very limited security of tenure which is particularly damaging for households with children and some renters face arbitrary evictions and unjustified rent increases.

The private rented sector has the potential to increase Southwark's housing supply because developers have fewer concerns about the rate at which the market can absorb new homes. The private rented sector also benefits the local and regional economy as it enables greater household mobility. We want to encourage a private rented sector which provides high quality, professionally managed accommodation and a greater level of security for tenants to that which is offered by much of the current private rented sector.

We will support institutional investment in the sector where benefits are secured for residents through agreement. Southwark's Private Rent Standard is a code of good practice for private landlords. The policy applies to larger-scale development (schemes providing 100 homes or more) because larger schemes are best placed to provide a high quality rental offer to tenants renting privately and tenants in discount market rent homes.

APPENDIX 6: LONDON BOROUGH OF WALTHAM FOREST, DRAFT AFFORDABLE HOUSING AND VIABILITY SUPPLEMENTARY PLANNING DOCUMENT (OCT 2017) -SECTION 9

9 Build to Rent and Affordable Housing Contributions

What is Build to Rent?

9.1 Build to Rent (BTR) are purpose built residential dwellings (house or flats) for private rent. They are professionally managed and should have longer tenancies than the conventionally private rented sector.

9.2 For the purposes of this SPD, a Build to Rent development must: Be a development, or block/ phase within a development, of at least 50 units; Hold its constituent homes as Build to Rent under a covenant for 15 years, with all affordable homes to be held inperpetuity; Prove that all units are self-contained and let separately; Operate under unified ownership and management Offer rent certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed and include any annual increases which should always be formula- linked The affordable housing provision rents to be inclusive of service charge; Offer longer tenancies (three years or more) with break clauses that allow the tenant to end the tenancy with a month's notice any time after the first six months and Property manager to be part of an accredited Ombudsman Scheme and a member of a recognised professional body. include on-site management, which does not necessarily mean full-time dedicated on-site staff, but must offer systems for prompt resolution of issues and some daily on-site presence; be operated by providers who have a complaints procedure in place and are a member of a recognised ombudsman scheme; and not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.

9.3 The definition requires all homes in a development to be BTR. However, it recognises that this might apply to just one block on a larger mixed tenure development. To use this viability route, most importantly, the units must be in single ownership and single management.

9.4 Providers must have a complaints procedure in place and be a member of a recognised ombudsman scheme. There should also be on-site management to deal with issues. London Borough of Waltham Forest

Tenancies

9.5 Tenancies are expected to be a minimum of three years with break clauses for renters, allowing the tenant to end the tenancy within one months' notice any time after first six months. Within these tenancies, any rent or service charge increase must be subject to a robust rent review. These should be made clear to the tenant when the property is let, and the Council will ensure they are not set to discourage tenants from taking longer tenancies. Rents should normally be reset on each new tenancy.

Letting Fees

9.6 BTR providers should not charge letting fees and must advertise their properties on the GLA London-wide portal. The provider may also advertise via other means. Financial model

9.7 The financial model for BTR differs from building for sale. The Council will recognise the distinct economics of this type of residential scheme. The distinct difference is that BTR schemes are reliant on long term revenue income through rent (taking account of management and maintenance costs), rather than short term receipts from sales. This means that a different assessment of affordable housing contribution is required. The approach the Council takes will be in line with the requirements set out in the Mayor's Affordable Housing and Viability SPG.

Covenants

9.8 The Council expects there to be a covenant in the Section 106 agreement to ensure that homes are retained in as professionally managed private rented accommodation, in single ownership; individual homes cannot be sold, and overall ownership of the scheme can only change if the scheme stays as BTR. The covenant is expected to be at least 15 years for market homes and in-perpetuity for the affordable housing element. This will remain as a local land charge on the development.

Affordable housing

9.9 All affordable housing within a BTR scheme will be in perpetuity. Therefore, should a BTR development be sold onto the open market at any time, during or after the covenant period, the Council would seek to recover an affordable housing contribution, either as a payment in lieu of on-site affordable housing or alternative affordable housing tenures on site.

9.10 Should the entire BTR scheme be covenanted for a specific period, the Council will require a viability re-assessment at the end of the covenanted period, with the expectation that this reassessment will be deliver a contribution to affordable housing in the Borough.

Affordable Housing Tenure

9.11 BTR developments are expected to provide affordable housing as affordable rent homes at discounted market rents (DMR). The Council will seek a mix of social rent/London Affordable Rent (at circa 50% of open market rent) and London Living Rent, inclusive of all service charges. The DMR must be managed by the BTR provider and 'pepper-potted' across the development to ensure the scheme is tenure blind.

Viability Appraisal

9.12 Each scheme will be assessed on a case by case basis. The intention will be to maximise the supply of affordable rent dwellings in each scheme.

9.13 An applicant is expected to submit supporting viability evidence.

9.14 Viability appraisals may need to take account of:

- A different approach to profit (often lower than a build for sale scheme) specifically the much longer-term return on investment and payback period and capital asset value at the end of this period for a BTR scheme;
- Different approaches to sales and marketing; sale/ disposal
- this will generally be faster for a BTR scheme (generally, a BTR appraisal will assume a development period and then a sale to an investor or operator); and
- Potentially lower risk compared to for sale schemes; and
- Cost unique to BTR schemes such as management and maintenance.

9.15 The following review mechanism will be applied in line with the Mayor's SPG:

- An early review where an agreed level of progress on implementing the permission is not made within two years of the permission being granted. Where a surplus above the initial agreed profit level is identified, this should be split 70/30 between the Council and the applicant. It is expected that in most cases any uplift in affordable accommodation at this early stage will be accommodated on-site. Thus plans should identify which units would switch to affordable accommodation in the event of an increase in viability at this early stage. If the agreed level of progress has been made, this review will not be triggered. All signatories to the Section 106 need to commit to making their best endeavours to fulfil their relevant requirements (setting out key milestones and requirements) to deliver the scheme and account may be had of the market situation at time of review;
- A near end of development review which will be applied once 75% of the market units with the development or at a date agreed by the Council at a point when market rents have stabilised. Where a surplus profit is identified this should be split 70/30 between the Council and the developer. The outcome of this review will typically be a financial contribution towards off-site affordable housing provision.

9.16 BTR viability reviews will normally be based on changes in the value of the development and build costs between the point of planning permission and the point of the review. It is expected that in most cases any uplift in affordable accommodation will be accommodated on-site. The Council's preference is for any surplus to contribute towards additional affordable homes in the development. Where this is not achieved the surplus should allow for deeper discounts on the secured affordable housing provision. A cash in lieu payment will only be acceptable in exceptional circumstances.

9.17 The review mechanism should be capped so that the on-site affordable housing and financial contribution are, when taken together, equivalent to 50% affordable housing. Although additional affordable housing up to 50% will generally be a priority, the review mechanism may also be used to contribute to other policy contributions which may not have been viable according to the initial assessment.

Monitoring and Review

9.18 The Council recognises that this is a rapidly evolving type of housing provision and will seek to keep up with national and regional policy, as well as, agreed industry standards in relation to assessing viability and affordable housing contributions from BTR schemes.

APPENDIX 7: SEQUENTIAL AND IMPACT TEST FOR RETAIL SITES OUTSIDE THE PRIMARY SHOPPING AREA

A4.1 The Primary Shopping Area of the town centre, along with the identified district and local centres, should house much of the identified need for additional retail development over the plan period. However, the Local Plan identifies two sites where retail development would be appropriate. These are the Cattle Market site (CR12a), for, potentially, bulky comparison goods, and the Forbury Retail Park (CR13b) for local retail uses to serve the residential community. These sites would be generally regarded as 'edge-of-centre' under the NPPF. In allocating sites within the Local Plan in an edge-of-centre location, local authorities should apply a sequential approach to site selection, and assess the impact of development on existing centres.

Cattle Market

A4.2 Policy CR12 designates the Cattle Market as follows:

"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, and must be designed to mesh into the urban fabric and a single storey retail warehouse will not be permitted."

Need

- A4.3 The main purpose of the Western Berkshire Retail and Commercial Leisure Assessment (EV020) was to assess the need for additional retail development. The identified retail need for Reading totalled 34,900 sq m (net), which is made up of a positive need for 54,400 sq m of comparison floorspace and an oversupply of 19,500 sq m of convenience floorspace. However, completions between 2013 and 2017 need to be taken into account, and the Housing and Economic Land Availability Assessment (EV014) identifies that this increases to 53,894 sq m, largely because a large amount of retail at Station Hill has been demolished pending redevelopment. This is not broken into comparison and convenience uses, since the permissions and completions do not always clearly fall into one category or another.
- A4.4 The approach then needs to consider how this need would be affected by existing planning permissions. This totals 22,545 sq m, and would reduce the overall need to 31,349 sq m.

SITE	A class uses net change (sq m)
Station Hill (wider site)	13,500
108-116 Oxford Road, 10 Eaton Place and 115-125 Chatham Street	-553
84 Watlington Street	-300
Land West of Rivermead Car Park	425
Jacksons Corner, 1-9 Kings Road	-2,061
Kings Point, 120 Kings Road	352
27-32 Market Place	-263
Primark, 32-42 West Street	-4,305

Table A4.1: Planning Permissions for Retail

St Martin's Precinct, Church Street	1,025
79 Silver Street	-386
34 Parkside Road	153
21 Rose Kiln Lane	1,125
The Meadway Centre, Honey End Lane	3,908
Worton Grange	6,260
Green Park Village, Longwater Avenue	684
Land at the Madejski Stadium	1,928
Unit 4 Brunel Retail Park	1,053
TOTAL	22,545

A4.5 The approach then needs to consider other parts of the Local Plan that would result in a loss of retail floorspace, through development for other uses. This totals a loss of 16,200 sq m, and increases the overall need again to 47,549 sq m.

SITE	A class uses net change (sq m)
Great Knollys Street and Weldale Street	-4,318
1-5 King Street	-1,710
115-117 Caversham Road	-111
The Woodley Arms PH, Waldeck Street	-400
Makro, Elgar Road South	-9,661
TOTAL	-16,200

Table A4.2: Retail Losses in Local Plan

A4.6 There is therefore sufficient identified need to justify some additional edge of centre provision of around 10-15,000 sq m (as identified in CR12a) at the Cattle Market site

Sequential Approach

- A4.5 The only locations that are sequentially preferable to edge-of-centre sites are locations within existing centres, which, in the case of the centre of Reading, mean the Primary Shopping Area. Therefore, the sequential approach should assess all sites that are available in the existing designated centres in the Borough. Other sites are not sequentially preferable.
- A4.6 The HELAA has already assessed the potential of suitable, available and achievable sites to accommodate retail development, and a number of these are inside the primary shopping area or within other designated centres. Table A4.3 sets out the Local Plan expectations for the net change that those sites will deliver. However, as set out in section 4.52 of this paper, this is constrained to some extent by what it is considered realistic to deliver, and there is some flexibility within some of these sites to accommodate an uplift in retail provision. Section 4.52 describes the assumptions in more detail, but the maximum potential capacity that results from that analysis is also shown in table A4.3.
- A4.7 No other sites have been identified as having potential for increase in retail floorspace, due to the existing high density of the retail use in the area.

Site	Centre	Identified potential net gain in retail floorspace from HELAA	Potential additional capacity (see section 4.52)	TOTAL
North of Station	Reading Centre (PSA)	1,768	14,300	16,068
Hosier Street	Reading Centre (PSA)	4,936	3,300	8,236
The Oracle Extension	Reading Centre (PSA)	1,770	0 ⁵⁵	1,770
173-175 Friar Street	Reading Centre (PSA)	111	0	111
Brunel Arcade and Apex Plaza	Reading Centre (PSA)	1,914	6,100	8,014
211-221 Oxford Road	Oxford Road West	441	0	441
261-275 London Road	Cemetery Junction	400	0	400
131 Wokingham Road	Wokingham Road	450	0	450
TOTAL		11,790	23,700	35,490

Figure A4.3: Capacity of Sequentially Preferable Sites

- A4.8 Even with these uplift assumptions, there is therefore still **12,059 sq m** of the identified need that cannot be accommodated in or adjoining the Primary Shopping Area or other designated centres.
- A4.9 Edge-of-Centre: A site is therefore required in an edge-of-centre location that can house this level of need. The Cattle Market site, allocated for 10,000-15,000 sq m is more than capable of housing this level of remaining need, meaning that there should not be a need for any significant out-of-centre development up to 2036.

Impact

- A4.10 Assessing impact in a comprehensive manner would require assessing the likely catchment of the development and how it would affect the trade draw of existing centres as a result. In most cases, the trade draw of the occupier is used as a basis. Therefore, an accurate quantitative assessment of impact is only possible at application stage.
- A4.11 The main impact of likely provision of bulky goods on the Cattle Market site could potentially be felt on the existing centre of Reading. This is also highly unlikely to be significantly negative. The edge-of-centre location would be more likely to complement than compete with the centre, particularly if the floorspace is for uses such as bulky goods, which are not easily accommodated in the Primary Shopping Area. Reading has long had edge-of-centre retail uses that have so far not detracted from the vitality and viability of the centre. The effect of the Local Plan would be to reconfigure where these uses are provided, moving them from Forbury Retail Park to the Cattle Market and possibly some areas north of the station i.e. from one edge-of-centre site to another.
- A4.12 Nevertheless, it is possible to look at what the turnover of the floorspace could be compared to the overall turnover of the centre of Reading. The Western Berkshire Retail and Leisure Assessment found that a sales density of £3,387 per sq m was achieved in retail warehousing in Reading in 2016 (see table 7.2 of the assessment). The Assessment assumes increasing sales efficiency of 1.63% per annum. Applying this to the 2016 sales density results in a 2036 sales density of

⁵⁵ Hammerson PLC consider there is additional capacity at the Oracle of some 5,500 sq m, but the Council has not seen any evidence of how this could be accommodated at this stage

£4,699 per sq m. If this is applied to the remaining need figure that could be accommodated on the Cattle Market site of 12,059 sq m (which sits somewhere in the middle of the range specified by CR12a), this means that the turnover of development on the Cattle Market could be £56,665,241. The Retail and Commercial Leisure Assessment considered that the comparison goods turnover of the centre at 2036 would be £2,308,400,000 (see table 8a from the Assessment). Therefore, even if all of the turnover of the Cattle Market were drawn from the centre of Reading, this would represent a trade diversion of 2.5%, which is not considered to be significant, and in any case relates only to the comparison goods turnover of the trade will be drawn from existing edge-of-centre and out-of-centre retail parks.

Forbury Retail Park

A4.13 Policy CR13 of the Local Plan notes the need for the Forbury Retail Park site to 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".

Need

- A4.14 The need for retail development at Kenavon Drive is different from the need on the Cattle Market, in that it is generated purely to serve the residential community that is being created on nearby sites in the East Side Major Opportunity Area. Policy CR13 of the Local Plan confirms that this retail would be 'at a scale to serve the Kenavon Drive area'. Whilst part of Central Reading, these sites are in some cases quite distant from the shopping centre and have no facilities to serve them. In any case, the centre's primary role is not as a convenience centre, and most of the floorspace is not aimed at a local catchment. The nearest district centre is Cemetery Junction, which is around a kilometre from the centre of the East Side.
- A4.15 In order to assess the need generated by this area, we need to look at how many dwellings will be accommodated in the East Side MOA, as follows:
 - 445 existing dwellings (The Meridian, Kennet Walk and 42 Kenavon Drive)
 - 1,238 dwellings planned on other sites by 2036 (see HELAA)
 - A total of 1,683 dwellings at 2036.
- A4.16 The next stage is to work out what this means in terms of population. At the 2011 Census, there was a population of 12,629 in Abbey ward (which broadly equates to the centre) compared with a dwelling figure of 6,783. This results in a dwelling to population ratio of 1.86. Using this ratio, this could mean a population of 3,130 by 2036 in the East Side MOA, although it is recognised that this is something of a crude analysis.
- A4.17 Translating this into expenditure and eventually floorspace requires the use of the Western Berkshire Retail and Commercial Leisure Assessment by GVA, for reasons of consistency. Because the purpose of the retail designation is to serve a local catchment, only convenience expenditure has been examined. Table 2 of Appendix II of the Assessment identifies a figure for expenditure per head of £1,905 on convenience goods at 2036 for Zone 1, within which the site sits, based on Experian data.
- A4.18 This means that the total available expenditure in the East Side MOA at 2036 would be £5,962,650 (expenditure per head x population).

- A4.19 The way to translate total expenditure into a floorspace requirement is to use the sales densities (i.e. total sales per net sq m) of a centre. The Retail and Commercial Leisure Assessment identifies a convenience trading performance of £11,325 per sq m in Reading at 2036. Applying a 0.09% per annum sales efficiency growth as used for convenience goods in the Assessment, this would mean £11,520 per sq m at 2036.
- A4.20 Using the above sales density results in a convenience retail floorspace need of 518 sq m at 2036. This is a lower level of convenience floorspace to many of the existing smaller centre, and therefore equates to the small-scale retail facilities required. There may be a greater need for other 'A' class uses and some very limited comparison retail.

Sequential Approach

- A4.21 The identification of need and the application of the sequential approach in delivering this need are intrinsically linked. The need has been generated from the East Side Major Opportunity Area, and therefore the provision should be in or on the edge of the East Side. This is in line with the strategy of promoting access to services by sustainable modes of travel. The Primary Shopping Area of the centre is 300 metres away from the closest part of the East Side residential area, and over 1 kilometre from the eastern parts of the area, and it therefore does not effectively serve this catchment. Nor does Cemetery Junction, which in any case, has no significant capacity for expansion.
- A4.22 Therefore, there are no sequentially preferable sites to the proposed location of the small-scale retail and leisure facilities.

Impact

- A4.23 Paragraphs A4.15 have demonstrated that the majority of the identified need (74%) comes from housing which is yet to be provided. Therefore, only 26% of the expenditure that will go to the centre (£1,550,029) relates to established shopping patterns from existing dwellings.
- A4.24 This figure is dwarfed by the expected convenience turnover of Reading centre at 2036. It is estimated that there is around 5,000 sq m of convenience goods retail within the Primary Shopping Area, which, at 2036 sales densities of £11,520 per sq m, results in a turnover of around £57,600,000. Even if the entire expenditure to support the new facilities were drawn from the centre, this would represent a very small trade diversion of 2.7% of convenience expenditure, which is in itself a comparatively small part of Reading town centre's overall turnover.
- A4.25 Impact on Cemetery Junction could be more significant, as it is smaller and more dependent on convenience retail. There is approximately 1,000 sq m of convenience floorspace in this District Centre (primarily within the Co-Op and the Tesco Express). Using the same 2036 sales densities of £11,520 per sq m, this would mean a turnover of £11,520,000 by the end of the plan period. If the entire expenditure were drawn from Cemetery Junction, it could equate to 13% of the centre's trade. However, this is an improbable level of impact, given that only half of the existing dwellings in the East Side are within ten minutes' walk (800m) of Cemetery Junction (those in Kennet Walk). The rest is far closer to the centre of Reading, and it therefore seems likely that the impact on Cemetery Junction could be at least halved, giving a maximum of around 6-7%. This is not a significant trade diversion.

Conclusion

A4.26 It is therefore considered that the identification of edge-of-centre sites at the Cattle Market (CR12a) and Forbury Retail Park (CR13b) for retail within the Local Plan passes both the sequential approach as set out in paragraph 24 of the NPPF, and the impact test as set out in paragraph 26.

APPENDIX 8: INTERNAL CONSISTENCY MATRIX OF POLICIES AND PROPOSALS

