

Statement of Consultation on the Pre-submission Draft Local Plan

March 2018

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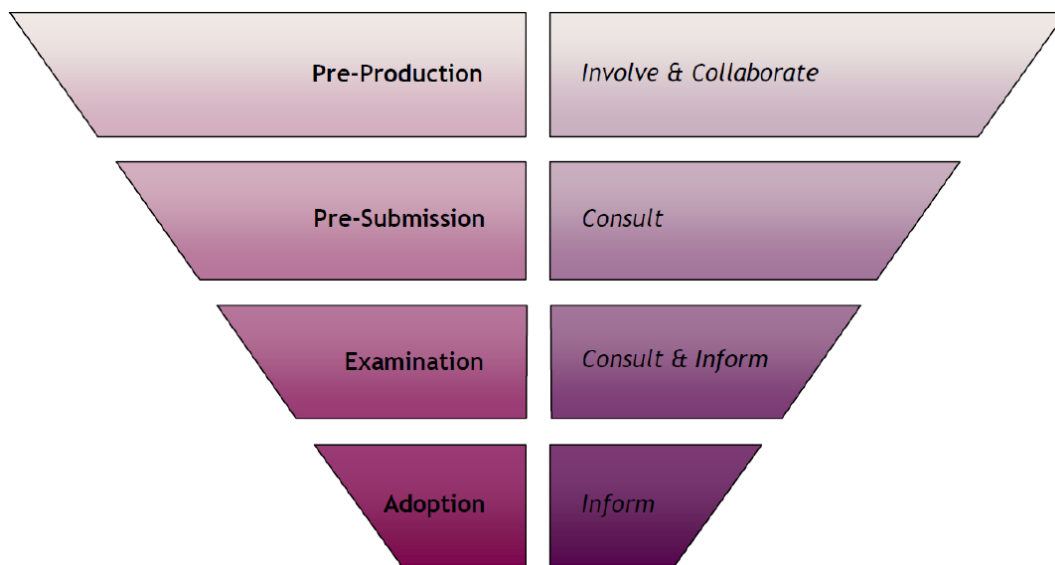
1.0 INTRODUCTION

- 1.1 The consultation that took place in November 2017 to January 2018 related to the new Local Plan for Reading. It was decided to proceed with a new comprehensive Local Plan to replace the three existing development plan documents (the Core Strategy, Reading Central Area Action Plan and Sites and Detailed Policies Document), particularly in view of changes that were made in the 2012 National Planning Policy Framework. A new Local Development Scheme was produced in 2013 (and updated in 2014 and again in 2016) which set out this intention.
- 1.2 The first consultation stage was on Issues and Options. Rather than a draft plan, this was a discussion paper that highlighted the important questions that inform what the plan should contain and how it should address the key matters. The Issues and Options document was particularly informed by the Berkshire Strategic Housing Market Assessment, which identified the level of objectively assessed housing need for Reading. The Issues and Options document also identified possible sites for inclusion in the draft plan.
- 1.3 The second consultation stage was on the Draft Local Plan. This document was a full draft, after taking account of all the comments received during the Issues and Options consultation as well as other emerging information. Supporting documents such as a Proposals Map, Sustainability Appraisal and Infrastructure Delivery Plan were also made available for comment. Consultation occurred from May 2017 to June 2017.
- 1.4 The third consultation was on the Pre-Submission Draft Local Plan. This document was another full draft, taking account of all the comments received during the Draft Local Plan consultation as well as other emerging information. Supporting documents were also updated and made available for comment, including a Proposals Map, Sustainability Appraisal, Infrastructure Delivery Plan and Housing and Economic Land Availability Assessment, as well as guidance on making a representation.

2.0 DETAILS OF CONSULATION

- 2.1 Consultation on the Pre-Submission Draft Local Plan, along with the accompanying Proposals Map, and Sustainability Appraisal began on Thursday 30th November 2017 and lasted until Friday 26th January 2018, a period of eight weeks. The Infrastructure Delivery Plan and Housing and Economic Availability Assessment were also made available as supporting documents.
- 2.2 In terms of an approach, the consultations on planning policy documents need to be undertaken in line with the Council's adopted Statement of Community Involvement (SCI). The latest version of Reading's SCI was adopted in March 2014.
- 2.3 The SCI sets out some general guidelines for how consultations on the local plan should take place, with the main principle being involving stakeholders at the earliest stage. Figure 1 shows the general approach to each stage of consultation.

Figure 1: Approach to Development Plan Documents from Statement of Community Involvement



- 2.4 The SCI gives some examples of the types of exercise that might be appropriate at the pre-submission stage, which corresponds to this consultation, and these include:
- Directly contacting important consultees, including those involved at earlier stages;
 - Direct discussion with key stakeholders;
 - Drop-in events, particularly in locations and at times where interested individuals have a chance to discuss aspects of the policy or plan with Council representatives; and
 - Publication of the policy or plan online.
- 2.5 Therefore, the overall approach for the Pre-submission Draft Local Plan was similar to that of the Draft Local Plan and somewhat more focussed than the Issues and Options stage and was centred on consultation rather than involvement and collaboration.
- 2.6 Consultation consisted of the following elements:
- Directly emailing over 1000 contacts on the Council's consultation lists, including statutory consultees, adjoining local authorities, Parish Councils, community and

voluntary groups, commercial organisations, businesses and interested individuals. The full list of those consulted is in Appendix 1, the text of the email is set out in Appendix 2, and the summary leaflet that was attached to the email is included in Appendix 3;

- Documents (including the Pre-Submission Draft Local Plan, Sustainability Appraisal, Proposals Map, Infrastructure Delivery Plan, Housing and Economic Land Availability Assessment and summary leaflet) being made available on the Council's website;
- Copies of the summary leaflet and of the Pre-submission Draft Local Plan being made available at Reading Borough Council libraries;
- A press release was also prepared and distributed (see Appendix 4). From this, articles on the Local Plan appeared in the local press (www.getreading.co.uk) (see Appendix 5); and
- Two drop-in events, when members of the Planning team were on hand together with exhibition boards (see Appendix 6) to discuss any issues arising, held at Reading Civic Offices on Wednesday 6th December and Tuesday 12th December.

3.0 RESULTS OF THE CONSULTATION: DROP-IN EVENTS

- 3.1 The two drop-in events were not particularly well-attended, possibly reflecting the increasing reliance on accessing information online. However, the low number of attendees did enable some quite in-depth discussions, which seem to have been reflected in the written representations that were subsequently made. Low attendance may also have been affected by the fact that much of the interactive consultation occurring during the Issues and Options phase and that two drop-in sessions occurred previously in the year during the consultation on the Draft Local Plan in May and June 2017.

4.0 RESULTS OF THE CONSULTATION: WRITTEN RESPONSES

4.1 The Council received over 193 written responses to the Draft Local Plan (although one of these was a petition with 142 signatures). These responses came from a mix of individuals, community groups, landowners and developers and other local authorities and public sector organisations. The responses that were received were in general quite detailed, and a total of 583 individual comments were made. Some of the main points raised are set out below:

- Generally, there was support for trying to accommodate the need for 671 homes per annum from the development industry. Adjoining authorities noted the position regarding the expected unmet needs.
- Many individuals expressed support for encouraging higher density growth in the town centre, while some individuals expressed concern about the number of flats planned and the need for more family housing, as well as affordability concerns.
- Many developers requested more flexibility, particularly with regard to energy efficiency, design and affordable housing. Additionally, some developers consider the requirement of employment development to mitigate impacts on housing to be onerous.
- A number of developers supported the Council's inclusion of a Private Rental Sector policy in order to encourage build-to-rent properties, but many disagreed with the specific approach taken and recommended changes.
- Many individuals expressed concern about the impacts of new development on existing infrastructure, citing traffic congestion, limited school places and crowded GP surgeries, particularly in the north of Reading.
- In terms of sites allocated for development, the sites that generated the largest volume of responses (most opposing development), were
 - Land at Kentwood Hill (WR3s) and Land at Armour Hill (WR3t)
 - Part of Reading Golf Course at Kidmore End Rd (CA1b)
 - Potential Traveller Transit Site at Cow Lane (WR4)
- Many developers and landowners who had put forth sites earlier in the process responded with support.
- Some individuals expressed concerns about the impacts of tall buildings on the character of the town.
- Some landowners and developers advocated other sites located just outside Reading's boundary, around Grazeley in Wokingham Borough and around the edges of Caversham and Emmer Green in South Oxfordshire District, as potential sites to help meet Reading's housing need.
- Numerous individuals and community groups expressed strong support for retention and improvement of existing open spaces. A number of responses were in relation to identification of sites as Local Green Space. The site most frequently mentioned was Mapledurham Playing Field.

- There were a number of detailed technical comments on the environmental policies from respondents such as the Environment Agency and Natural England.
- Historic England, community groups and individuals were pleased with the greater emphasis placed on heritage within the Local Plan.

4.2 A summary of each individual representation is included in Appendix 9 to this document.

4.3 A number of responses related to development at Reading Golf Course (CA1b) were received after the close of the consultation. These are summarised in Appendix 7.

5.0 EVALUATION OF CONSULTATION

- 5.1 Generally, the approach to the consultation on the Pre-submission Draft Local Plan was considered to be reasonably productive, in view of the resource constraints for carrying out such a consultation, particularly in terms of officer time. There would certainly have been measures that would have brought a greater response, but that needed to be weighed up against limited resources and the fact that many of the policies and sites had been consulted on relatively recently. With 193 responses received, this is somewhat higher than the 150 or so received to the Draft Local Plan consultation.

- 5.2 Attendance at the drop-in events was low compared to previous years. This may have something to do with a greater proportion of people being able to access information on the internet. However, it may still be worth continuing to offer this facility in future years for those who do not have web access or who want to discuss matters in detail.

APPENDIX 1: LIST OF THOSE CONSULTED ON THE PRE-SUBMISSION DRAFT LOCAL PLAN

3	Barton Willmore on behalf of Aviva Investors
A Brackenridge	UK Ltd
Abracad	Basingstoke & Deane Borough Council
Access & Planning (Education\Strategy & Planning	BBOWT
Access Architects	BDO Stoy Hayward LLP
Adam Masters	BDS Surveyors Limited
ADS	BDS Surveyors Ltd
Age UK Reading	Beard Construction
Age UK Reading	Beatrice Scott
Alan and Pam Reynolds	Beatrice Scott
Alan Penton	Bell Cornwell Partnership
Alastair Bainton	Bell Tower Community Association
Alastair Letchford	Bellway Homes Limited (Thames Valley Division)
Alex Hill	Bellway Homes Ltd (Thames Valley)
Alex Jackman	Ben Fox
Alexandra Hemming	Benchmark Planning
Alison Bond	Berkshire Archaeology
Alistair Appleton	Berkshire County Blind Society
Amir Laghaei	Berkshire Local Nature Partnership
Andrea Warner	Beth Pywell
Andrew Clifton and Annette McCartney	Bethan Howard
Andrew Edwardson	Bewley Homes
Andrew Scott	Blandy and Blandy
Andrew Smith	Bluestone Planning Ltd
Andrew Tudor	Bob Tarling
Angela Macdonald	Booker Group plc
Anita Soulsby	Boyer Planning
Ann Jenkin	Boyer Planning Limited
Anna Ambroziewicz	Boyes Turner
Anna Gargan	Bracknell Forest Council
Anna Stott	Brian Jamieson
Anne and Derek White	Briony and David Downey
Anne Davis	British Sign and Graphics Association
Anonymous	Broadway Malyan
Arcus Consultancy Services Ltd	Broadway Malyan
ARD Chartered Architect	Brook Henderson Group Limited
Arlington Business Parks GP Limited (Goodman)	BT Repayments Planning Department
Armstrong Rigg Planning	Buckinghamshire County Council
Arqiva Limited	Bucknell Family - Global Futures Limited
Art R Miller	Building Design
Arthur Hill Save Our Swimming CIC	Burghfield Parish Council
Assael Architecture Ltd	C M Makin
ATP Group Partnership	CADRA
Aviva Life Pensions UK Ltd	CADRA Caversham and District Residents Association
Barbara Garden	Caldecotte Consultants
Barclays Bank Plc	Campbell Gordon
Barton Willmore	CAMRA

Cantay House Partnership
Carol Mclellan
Carol Morton
Carolyn Davidson
Carolyn Ribbons
Carter & Son (Thattham) Ltd
Catherine Wood
Cathy Szklar
Caversham Globe
CBRE
Cedarmart Ltd
CEMEX
CgMs Consulting
Chair, Reading Chamber Of Commerce
Charlotte Markey
Chillingham Limited
Chiltern District Council
Chris Hillcoat
Church Street Baguettes
Civil Aviation Authority
Clair Drever
Clive Bedford
Cllr Catherine Wilton (Minster/Lab)
Cllr Ed Hopper (Thames/Con)
Cllr Matt Rodda (Katesgrove/Lab)
Cllr Mohammed Ayub
Cllr Ricky Duveen
Cllr Rob White
Cllr Thomas Steele
Cllr Tony Jones
Cognatum
Colin and Christine Robinson
Commercial Estates Group
Coppid Farming Enterprises c/o Savills
Corporate Procurement Level 7
Councillor Jan Gavin
Councillor Kelly Edwards
Councillor Marian Livingston
Councillor Melanie Eastwood
Councillor Paul Woodward
Councillor Rachel Eden
Councillor Rose Williams
Councillor Sandra Vickers
Councillor Sarah-Jane Hacker
Country Land and Business Association
CPRE Berkshire Branch
Creative Design and Structure Ltd
Crest Nicholson Ltd
Cristo Design
Cumming Anderton Architects
D J Bailey

D2 Planning
Dagleish And Co
Daniel and Gilbert/Weldale Caversham Ltd
Daniel Andrews
Daniel Patrick Russell
Date Newnham
David and Gaylene Shepherd
David and Susan Bailey
David Birkett Associates
David Cooksley Associates
David Griffiths
David Lock Associates
David Parsons
David Richmond
David Syrad Architects
Day Tanner Partnership
De Merke Estates Ltd
Deborah Dadd
Defence Estates Head Office
Deloitte Caroline McDade
Denis King and Gillian King
Denton and Gibson Ltd
Development (Environment) Floor 3
Disabled Access Group
Doctor Abigail Macleod
DPDS Consulting Group
Dr Adrian Tompkins
Dr and Mrs Caithness
Dr Andrew Smith
Dr Antony Cowling
Dr Carol Brickley
Dr Caroline Charles
Dr Chris Howlett
Dr John Partington
Dr Julia Waters
Dr Mani Karim
Dr Maria Pletnikova
Dr Megan Aldrich
Dr Neil Buchan
Dr Samantha Coates
Drews Limited
Drivers Jonas Deloitte
Drivers Jonas Deloitte
DTZ Piedad Consulting
Dunster and Morton
Earley Town Council
Edgington Spink and Hyne
Education and Skills Funding Agency
Edwards Irish Partnership
Elaine Mountford
Elaine Murray

Eleanor Pitts
Elisa Miles
Emma Fletcher
Emma Rawlinson
Emmer Green Residents Association
Englefield Estate
Environment Agency Planning Liaison
Environmental Protection (Reading Borough Council)
Eric Bowes
Evelyn Williams
Eye and Dunsden Parish Council
Federation of Small Businesses
Federation of Tenants & Residents Associations
Fields in Trust
Firstplan
Foster Wheeler
Foudry Properties
FPD Savills
Frances
Frances Hill
Francis Brown
Freshwater Group
Friends of Caversham Court Gardens
Friends of the Earth
Friends, Families and Travellers
Fusion Online Limited
G J Grashoff and A B Grashoff
G Moffett
Gareth Warwick
George Bickerstaffe
Gillian and Denis King
Gillian Andrews
Gillian Makin
Gladman Developments
Globe-Newtown
Globe-Newtown
Goodman International Ltd
Graham Griffiths
Graham Ritchie
Green Health Reading
Greg Lewis
GVA Grimley Ltd
Hallam Land Management Ltd
Halson Mackley Partnership
Hammerson Plc
Hampshire County Council
Hart District Council
Harvey Smith
Haslams

Hayley Brommell
Head Teacher
Health and Safety Executive
Heather Le Couteur
Heineken (UK) Ltd
Hermes
Hicks Baker Ltd
Hicks Developments Ltd
Highdown Avenue Management Association Limited
Highways England
Historic England
Hives Architects LLP
Holybrook Parish Council
Homes and Communities Agency
Howard Thomas
I Rivers
Ian Campbell
Ian Duddle
Ian Howard
Ian Hunt Associates Ltd
Ian Lloyd
Ian Sutherland
Iceni Projects
IKEA Investment Properties Ltd
Imperial Properties (Reading) Ltd
Inception Reading Sarl (C/o Moorgarth Group Ltd)
Inchcape Estates Limited
Inglewood Court Residents Association
Integrated Youth Development Service
Isabel Burn
J Pritchard
Jacobs Babtie Public Service Division
Jacqueline Charles-Jones
Jake Geczy
James Harris
James Lloyd
Jan Steele
Jane Bickerstaffe
Jane Chesterfield
Jane Evans
Jane Field
Jane Terry
Jean Atkins
Jeff Taylor
Jennie Newnham
Jo Unsworth
Joan and Graham Clark
Joanne Hales
Jodie Brown

John and Kay Hayes
John and Meg Vought
John Berry
John Booth
John Dunningham
John George Ltd
John Heaps
John Lewis Partnership
Jonathan and Gemma Matthews
Jonathon Turner
Jones Lang LaSalle
Jones Lang LaSalle
Jones Lang LaSalle
Joseph Baker
Judith Oliver
Julia Branson
K Phillips
Kadambari Michaels
Kate Corder
Katherine Slater
Katia Major
Katie Dean
Keir Price
Kempton Carr Croft
Ken Macrae
Ken Phillips
Kennet & Avon Canal Trust
Kenya Hill
Kidmore End Parish Council
Kier Property Developments Limited
Kier Reading LLP
Kieron Gregson
Lambert Smith Hampton
Lambert Smith Hampton
Larry Watson
LaSalle Investment Management
Laura and Alistair Johnson
Lawrie Lee
Lee and Brian Waite
Leslie Burrow
Lin Godrey
Llisa Digweed
Lloyd Pople
Lorna Andrew and Jed Ellerby
Louise Bancroft
Louise Fenner
Louise Turner
Lucie Twivey
Lucy Bureau
Luke Sumnall
Lynda Chater

M D Howlett Associates Ltd
Mapeley Estates Limited
Mapeley STEPS Limited
Margaret and Michael Pocock
Margaretta Watkins
Marie-Dominique Meunier
Marine Management Organisation
Mark Corbett
Mark Eveleigh
Mark Leedale Planning
Mark Owen
Martin & Pole
Martin Bishop
Mary Bartlett
Mary Cook
Matt
Max Goode
Mayor of London
McKay Securities Plc
Melanie Sutherland
Michael Burgess
Michael Geater
Michael Payne
Mike Merrick
Ministry of Justice
Miss Adrienne Duke
Miss Allison Cardie
Miss Amy Miles
Miss Britt Bjoro
Miss Charlotte Hopley
Miss Coral Cissewski
Miss Davies
Miss Dawn Halpin
Miss Elaine Cobb
Miss Elaine Robson
Miss Elonwy Rees
Miss Emma Perry
Miss Freda Hyatt
Miss Gillian Hopper
Miss Grace Crossley
Miss Helen Gibson
Miss Hilary Morton
Miss Jenna Polak
Miss Joanna Bottiglieri
Miss Karen Reeves
Miss L V Jones
Miss Marissa Tsoukas
Miss Melanie Tether
Miss Michelle Sleaford
Miss Nicola Hamblin
Miss Rebecca Mashayekh

Miss Susan Curd
Miss Tanya Rosenberg
Morley Fund Management Ltd
Motik Consulting Associates
Mr & Mrs Martin and Judith Cullen
Mr & Mrs S D'Cruz
Mr & Mrs Sirisena
Mr Aaron Collett
Mr Adrian Windisch
Mr Alan Barnes
Mr Alan Hardwick
Mr Alan Overton
Mr Alan Rutter
Mr Allen Sinclair
Mr Alok Sharma MP
Mr Alun Edwards
Mr and Mrs A Murray
Mr and Mrs C Goslar
Mr and Mrs C K Neo
Mr and Mrs C.R. And H.E. Hanshaw
Mr and Mrs Halter
Mr and Mrs Howes
Mr and Mrs J Colbourn
Mr and Mrs M Gulliford
Mr and Mrs Peter & Jennie West
Mr and Mrs R Buzza
Mr And Mrs Stone
Mr And Mrs Taylor
Mr And Mrs W Courtnage
Mr Andrew Clayfield
Mr Andrew Laylry
Mr Andrew Robertson
Mr Andrew Somerville
Mr Anthony Ford
Mr B Garvie
Mr Barras
Mr Barry Blewitt
Mr Bates
Mr Ben Stanesby
Mr Bertram Pepper
Mr Biddle
Mr Brendan Ridge
Mr Brian Oatway
Mr Brian Warren
Mr Browne
Mr Charlie Clare
Mr Chris Townsend
Mr Chris Webster
Mr Chris Wood
Mr Christopher Bedford
Mr Christopher Head

Mr CJ Harding
Mr Clive Tombs
Mr Colin Hatcher
Mr Colin Lee
Mr Craig Anderson
Mr Craig Round
Mr Craige Burden
Mr DA Weston
Mr Damian Bell
Mr Darren Lovelock
Mr Darren Mulcahy
Mr Dave Kenny
Mr David Cole
Mr David Earnshaw
Mr David Farrell
Mr David Harris
Mr David Patterson
Mr David Scull
Mr David Warren
Mr Dean Ellis
Mr Dennis Matthews
Mr Derek Bertin
Mr Derek Chapman
Mr Derek North
Mr Duncan Wooldridge
Mr Edward Hammond
Mr Edward Wild
Mr Eric Bolton
Mr Fred Higgs
Mr G Goodall
Mr Gareth Epps
Mr Garry Foster
Mr Gavin Moyse
Mr Gavin Thurley
Mr Geoff Armstrong
Mr Gordan Ball
Mr Graeme Lang
Mr Graham Jerome
Mr Greg Farrell
Mr Guest
Mr Hora Tevfik
Mr Ian Cuthbert
Mr Ian Knock
Mr Ian Mackinder
Mr James Cook
Mr James Walsh
Mr Jan Steele
Mr Jason Harper
Mr Jason Pyke
Mr Johann Wain
Mr Johannes Hersbach

Mr John Hall
Mr John Hendy
Mr John Hoggett
Mr John Holland
Mr John J Frake
Mr John McLeod
Mr John Mould
Mr John Mullaney
Mr John Varney
Mr John Wilkins
Mr Jonathan Green
Mr Jonathan Sutton
Mr Joseph Provino
Mr Keith Downer
Mr Keith Elliott
Mr Keith Weaver
Mr Kevin Griffiths
Mr Leslie Chubb
Mr Leszek Luszowicz
Mr Logan Morris
Mr Lumbroso
Mr Lyttle
Mr M Barrett
Mr M Zamir
Mr Magnus Smyly
Mr Mark Ashfield
Mr Mark McGovern
Mr Mark Pargeter
Mr Mark Roach
Mr Mark Young
Mr Martin Brommell
Mr Martin Champion
Mr Martin Mikhail
Mr Martin Wagner
Mr Martyn Jones
Mr Matt Bullock
Mr Matt Shaw
Mr Michael Thomas
Mr Michael Wellock
Mr Mike Atkinson
Mr Napier Munro-Faure
Mr Nick Clark
Mr Nick Stone
Mr Nigel Armstead
Mr Nigel Haines
Mr Oliver Jenks
Mr Omkar Adhikari
Mr Parmod Sharma
Mr Paul Elford
Mr Paul Harrison
Mr Paul Higginbotham

Mr Paul Morris
Mr Paul Raynsford
Mr Paul Rylands
Mr Paul Turnock
Mr Peter Baker
Mr Peter Hallbery
Mr Peter Hempstead
Mr Peter Moran
Mr Peter Weaver
Mr Peter Wood
Mr Peter Woodbridge
Mr Phil Baines
Mr Philip Allen
Mr Phillip Gill
Mr Piers Caswell
Mr R V Smith
Mr R W Embling
Mr Rab Lee
Mr Richard Fenn
Mr Richard Kenwood
Mr Richard Mallett
Mr Richard Riley
Mr Robert Constance
Mr Robert O'Neill
Mr Roger N Walton
Mr Ronald Cutting
Mr Ross
Mr Ross Thomson
Mr S Kendrick
Mr Scott Calder
Mr Shahid Rafiq
Mr Simon Ede
Mr Simon Riley
Mr Stephen Biddle
Mr Stephen Young
Mr Steve Hicks
Mr Steve Higgs
Mr Steve Luckcock
Mr Stuart Gould
Mr Sunil Fernandes
Mr Sunil Gandhi
Mr Surinder Puri
Mr T Gutteridge
Mr Terry Alway
Mr Terry Mills
Mr Thomas Sinclair
Mr Tim Byrne
Mr Tim Humphries
Mr Tom Robinson
Mr Tom Winchester
Mr Tony Martin

Mr Trevor Keable
Mr Trevor Thomas
Mr Victor Koroma
Mr W S G Macphee
Mr William Pocock
Mr Winter
Mrs Ann Briers
Mrs Ann Davis
Mrs Ann Rance
Mrs Anna Ellis
Mrs Annie Bass
Mrs Carol Froud
Mrs Caroline Stewart
Mrs Carolyn Ribbons
Mrs Cathy Snarey
Mrs Christine Cliburn
Mrs Christine Cuthbertson
Mrs Christine Northway
Mrs Claire Gulliver
Mrs Clotilda Rahman
Mrs Dorothy Gibert
Mrs E R Smeeth
Mrs Eileen Uden
Mrs Elaine McDonald
Mrs Elaine Warwick
Mrs Elizabeth Blair
Mrs Elizabeth Parsons
Mrs Emma Card
Mrs F Hyman
Mrs Francis Mitchell
Mrs Gillian Wilson
Mrs Hazel Andrew
Mrs Hazel Matthews
Mrs Heidi Anderson
Mrs Ida McVetis
Mrs Jan Temperley
Mrs Jane Jarvis
Mrs Janet Gray
Mrs Janette Sassoon
Mrs Jenny Cottee
Mrs Jenny Hicks
Mrs Joyce Parsons
Mrs Julie Gould
Mrs June Hardcastle
Mrs Karen Close
Mrs Kelly Tatam
Mrs Laura Roses
Mrs Linda McCauley
Mrs Lis Howlett
Mrs Lyn Chandler
Mrs Lynn Eggleton
Mrs Margaret McDermott
Mrs Mary Waite
Mrs Melanie Minty
Mrs Norma Sindclair
Mrs Pamela Webb
Mrs Patricia Woodcock
Mrs R Mansor
Mrs Rachel Ruchpaul
Mrs Rosemary Porter
Mrs S Elston
Mrs Sadie Cooke
Mrs Sandie Rimmer
Mrs Sheila Lines
Mrs Susan Baker
Mrs Susan Johnston
Mrs Tanya Rae
Mrs Theresa Robinson
Mrs Tina Barnes
Mrs Tracey Dunk
Mrs V Munro
Mrs Violet Hurn
Mrs Virginia Day
Mrs Zoe Page-Smith
Ms Amanda Day
Ms Beth Scott
Ms Caroline Anscombe
Ms Cath Moffat
Ms Catherine Hutchison
Ms Cathy Frost
Ms CP Lim
Ms Dawn Whipp
Ms Doris Carter
Ms Fiona Loughlin
Ms Hitchcock And Mr Watts
Ms Isla Geddes
Ms Isobel Ballsdon
Ms J Heward
Ms J Manning Brown
Ms Janet Sherbourne
Ms JM Langford
Ms Joanna Stewart
Ms Karen Rumbol
Ms Karin Herbst
Ms Liz Ellis
Ms Lynne Lemon
Ms Marie Percival
Ms Nicky Simpson
Ms Nicola Suter
Ms Ruth Perkins
Ms S Sheikh
Ms Sarah Gee

Ms Sarah Waite
 Ms Sharon Kiely
 Ms Sonia Law
 Ms Stella Clark
 Ms Susan Grover
 Ms Taplin
 Ms Veronica Chapman
 Ms Vickie Abel
 Ms Zeba Rao
 Museums, Archives And Libraries
 Nancy Jarakana
 Natalie Pryor
 National Grid
 National Offender Management Service/HM
 Prisons
 Natural England
 Network Rail
 Network Rail
 Neville Turner
 Nexus Planning
 NHS North and West Reading Clinical Comm
 Group
 NHS South Reading Clinical Commissioning
 Group
 Niamh Sherwood
 Nick Hunter
 Nicola Gooch
 Nigel And Helen Dodd
 Norma and Julian Ansell
 Norman Bullock
 North Whitley Tenant Team Chair
 Northcourt Avenue Residents Association
 Northcourt Avenue Residents Association
 Oak Leaf Surveyors
 Office For Nuclear Regulation
 Office of Rail Regulation
 Open Spaces Society
 Orla McBride
 Owner/Occupier
 Owners Of 350 Basingstoke Road
 Oxford City Council
 Oxfordshire County Council
 P J Planning
 Pangbourne Beaver Investments
 Parkinson Holt LLP
 Parks Operational Level 1
 Patricia Appleton
 Paul Myerscough
 PCSO Marion Ryall
 Peacock & Smith
 Pegasus Planning Group
 Peter and Linda Smith
 Peter Andrews
 Peter Brett Associates
 Peter Brett Associates
 Peter J Vallance
 Phil Smith
 Pioneer Property Services
 Pip Waite
 Pitmans
 Plan Ahead Drawing Services
 Planinfo
 Planning Potential Ltd.
 Polsted Road Residents Committee
 Professor Nigel Bell
 Professor Paul Bardos
 Prospect Estate Agents
 Provision Planning
 Prudential Plc
 Public Health Consultant
 Purley On Thames Parish Council
 Quod
 Rachael Staines
 Radian
 Raglan Housing Association
 Rapleys
 Rapleys
 Rapleys
 RBS Pension Trustee Ltd
 Reading Abbey Quarter Project Team
 Reading Chronicle Environment
 Correspondent
 Reading Civic Society
 Reading Conservative Group
 Reading CTC District Association
 Reading Cycle Campaign
 Reading Golf Club Ltd
 Reading Gospel Hall Trust
 Reading Muslim Council
 Reading Transport Ltd
 Reading UK CIC
 Reading Urban Wildlife Group
 Reading Voluntary Action
 Reading Youth Cabinet
 Rebecca Chiazzese
 Rebecca Sherbird
 Red Kite Development Consultancy
 Redlands And University Neighbourhood NAG
 Redlands GLOBE
 RenewableUK
 Rentplus
 Reverend Keith Knee-Robinson

Reverend Vernon Orr
 Richard and Linda Beakhouse
 Richard Fenn Designs Limited
 Richard Lemon
 Richard Maung
 Richard Pearson
 Ridge And Partners
 Robert Cort Properties
 Robert Dimmick
 Robert Markus Gyselynck & Mya Davis
 Robert Rigby Architects
 Robert Rigby Architects
 Robert Turley Associates
 Roger Ebbett
 Romans
 Ropemaker Properties
 Ross Brereton
 Rowberry Morris
 Royal Berkshire Fire And Rescue Service
 Royal Berkshire NHS Foundation Trust
 Royal Borough Of Windsor And Maidenhead
 Royal Mail Group Ltd
 RPS
 RPS Planning
 Rushmoor Borough Council
 Russell Crow
 Ruth Shaffrey
 S E Tucker And J Calcutt
 Sackville Developments (Reading) Ltd
 Sally Archer
 Sally Beales
 Sally Roark
 Sandra Gordon
 Sara Batting Estate Agents
 Sara Kopp
 Sarah Hayter
 Sarah Judge
 Sarah McCullough
 Savills
 Savills
 Savills
 Scott Brownrigg
 Scott Versace
 Scottish And Southern Electricity Plc
 Setsquare Solutions
 SGN plc
 Sharps Commercial
 Sheila Harris
 Sheilah Higginson
 Sheppard Robson
 Shinfield Mothers Union
 Shinfield Parish Council
 Shirwell Ltd
 Shonagh Brunnen
 Simona Kermavnar
 Slough Borough Council
 Sonic Star Properties Ltd
 Sonning Parish Council
 South Bucks District Council
 South Oxfordshire District Council
 Southern Housing Group
 Spen Hill Developments
 Sport England
 Sport England
 SSE Power Distribution
 St James Group Ltd
 Standard Life Investments
 Stephanie O'Callaghan
 Steve Ayers
 Steve Waite
 Steve Watson
 Sue Ronay
 Sun Street Y&C Centre
 Surrey County Council
 Surrey Heath Borough Council
 Susan Knight
 Susan Spires
 SusTrans
 Swindon Borough Council
 TA Fisher
 TA Fisher & Sons
 Tanja Rebel
 Taylor Wimpey West London
 Tennant Support
 Tennant Support Ground Floor
 Test Valley Borough Council
 Tew Design
 Thames Properties
 Thames Properties Ltd
 Thames Valley Berkshire Local Enterprise
 Partnership
 Thames Valley Chamber Of Commerce And
 Industry
 Thames Valley Police
 Thames Valley Police - Crime Prevention Team
 Thames Water
 The Butler Partnership
 The Canal & River Trust
 The Coal Authority
 The Council Of British Archaeology
 The Gardens Trust
 The JTS Partnership LLP

The Keen Partnership
The Keen Partnership
The Launchbury family
The National Federation Of Gypsy Liaison
Groups
The Ramblers Association - Berkshire Area
The Royal Society For The Protection Of Birds
The Theatres Trust
The Warren & District Residents Association
Therese Wicks
Tilehurst Allotments Society
Tilehurst Parish Council
Tilehurst Poor's Land Charity
Tilehurst Poor's Land Charity
Tim Cook
Toby Scammell
Tracey Essery
Transport 2000
Transport for London
Trevor Haynes
Troy Planning
Trustees of the Phillimore Successors
Settlement

TRW Pensions Trust Ltd
UBS Global Asset Management (UK) Ltd
University of Reading
University Of Reading
University Of Reading (Stephen Jenkins)
Vale of White Horse District Council
Veronica Leeke
Victoria Blades
Victoria Chase
Vodafone
Vodafone and O2
Walsingham Planning
West Berkshire Council
Westbuild Homes Limited
Willowside Homes
Wiltshire Council
Wokingham Borough Council
Women's Learning Centre
Woodley Town Council
Woolf Bond Planning
Woolf Bond Planning LLP
Worton Grange Industrial Limited
Wycombe District Council

APPENDIX 2: CONSULATION EMAIL TEXT AND ATTACHMENT

Reading Borough Council is now consulting on the Pre-Submission Draft Local Plan until 26th January 2018.

We are in the process of producing a new Local Plan to replace existing development plan documents, and to plan for development in Reading up to 2036. Once adopted, the Local Plan will be the main document that informs how planning applications are determined and covers a wide variety of strategic matters, policies and specific sites for development.

We are seeking comments over the next eight weeks during a period of public consultations. The full Pre-Submission Draft Local Plan is on the Council's website at:

<http://www.reading.gov.uk/newlocalplan> and copies can also be viewed at the Civic Offices, Bridge Street, Reading, RG1 2LU (between 9 am and 5 pm on weekdays) and in all Council libraries (during normal opening hours). Supporting documents, such as a Pre-Submission Draft Proposals Map, Sustainability Appraisal and Infrastructure Delivery Plan are also available on the Council's website and are available for your comments. A brief summary leaflet is attached to this email.

We welcome any comments that you have. Please provide written responses to the consultation by 5 p.m. on Friday 26th January 2018. Responses should be sent to: planningpolicy@reading.gov.uk or Planning Policy Team, Reading Borough Council, Civic Offices, Bridge Street, RG1 2LU.

You may also wish to attend one of our drop-in events to talk about the Local Plan to a planning officer in more detail. There is no need to let us know if you wish to attend beforehand. These will be held at the Civic Offices, Bridge Street, RG1 2LU in main reception on Wednesday 6th December from 1:00 to 6:00 p.m. and Tuesday 12th December from 2:00 to 7:00 p.m.

We intend to submit the plan to the Secretary of State in February or March 2018, taking your responses to this consultation into account. A public examination will take place thereafter with adoption expected in late 2018 or early 2019.

If you would like to be removed from our consultation lists, please let us know. We look forward to receiving your comments.

Regards,

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

Reading Borough Council
Civic Offices
Bridges Street
Reading
RG1 2LU

0118 937 3337

Email: planningpolicy@reading.gov.uk

[Website](#) | [Facebook](#) | [Twitter](#) | [YouTube](#)



Reading Borough Council – Pre-Submission Draft Local Plan
Under Regulation 19 of the Town and Country Planning (Local Planning) (England)
Regulations 2012

November 2017

Guidance on Making Representations
(Statement of Representations Procedure)

Consultation Details

Reading Borough Council is consulting on a Pre-Submission Draft Local Plan together with a Proposals Map and accompanying Sustainability Appraisal, between 30th November 2017 and 26th January 2018. The Local Plan sets out proposed planning policies in Reading up to 2036.

The Local Plan, together with the Proposals Map and other supporting documents, are available to view on the website (www.reading.gov.uk/newlocalplan). The Local Plan is also available in the reception of the Reading Civic Offices, Bridge Street, RG1 2LU, between 9am and 5pm Mondays to Fridays, and in all Reading Borough Council libraries during normal library opening hours.

Representations should be made in writing, either by e-mail or post. Please e-mail responses to:

planningpolicy@reading.gov.uk

Or send responses to:

Planning Policy
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

We will not be able to accept representations made after Friday 26th January 2018.

Guidance on making representations

Since this is intended to be the final draft of the document before it is submitted to the Secretary of State, there are some important differences in making representations to previous stages.

Firstly, you should be aware that representations made at this stage will feed directly into the public examination on the Local Plan, which is expected to take place during Spring/Summer 2018. Representations at this stage will be provided to the independent Inspector appointed to examine the plan as evidence, and will therefore need to be published on the Council's website. Personal details such as postal and e-mail addresses, telephone numbers and signatures will be removed before publication, but contact details will need to be provided to the Inspector so that your representation can be considered.

Secondly, the examination will be to find out whether the Local Plan is sound, legally compliant and fulfils the duty to co-operate. Therefore, your representation will need to

address whether you think the Local Plan passes or fails these tests. More details on these tests are below:

- **Legal compliance:** The Plan should have been prepared in line with all relevant legislation.
- **Soundness:** In order to be sound, a plan must be:
 - Positively prepared - 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;
 - Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.
- **Duty to co-operate:** This is a legal duty on local authorities to co-operate with other local authorities and a number of other bodies in preparing plans. More detail on the duty to co-operate is available at <https://www.gov.uk/guidance/duty-to-cooperate>

The Council has provided a form for making representations (see overleaf), which will ensure that the relevant matters are addressed. However, our past experience has been that such forms are not particularly well-used. We will therefore still accept representations made in writing by e-mail or post without using the form, as for other consultations. However, we do ask that your representations set out the following information for each part of the plan that you wish to comment on:

- The part of the document to which your response relates (paragraph, policy or section);
- Whether you consider that the plan, or part of the plan, is legally compliant, sound and complies with the duty to co-operate, and why;
- What modification you think is necessary to make the plan, or part of the plan, legally compliant and/or sound¹;
- Whether you wish to appear in person at the public examination; and
- Whether you wish to be kept informed of the progress of the plan.

More information on the process of public examinations into Local Plans is available by following the link below:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/531005/Procedural_Practice_in_the_Examination_of_Local_Plans_-_final.pdf

¹ As the duty to co-operate is intrinsic to how a plan is prepared, there are no modifications which can be made to address a failure to comply with it.

Please return by Friday 26th January 2018 to: Planning Policy, Civic Offices, Bridge Street, Reading, RG1 2LU or email planningpolicy@reading.gov.uk

PART A - YOUR DETAILS

	Personal Details	Agent's Details <i>(if applicable)</i>
Title		
First Name		
Last Name		
Job Title <i>(if applicable)</i>		
Organisation <i>(if applicable)</i>		
Address 1		
Address 2		
Address 3		
Town		
Post Code		
Telephone		
E-mail		

PART B - YOUR REPRESENTATION (please use a separate form for each representation)

B1. To which part of the Local Plan does this representation relate?

B2. Do you consider that the Local Plan: (please tick as appropriate)

Is legally compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Fulfils the duty to co-operate?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

B3. Please provide details of why you think the Local Plan, or part of the plan, is or is not legally compliant, sound and/or complies with the duty to co-operate.

Please continue on another sheet if necessary

B4. Please set out the modifications that you think would make the Local Plan, or part of the plan, legally compliant and/or sound. Please provide specific wording where possible.

Please continue on another sheet if necessary

B5. If you are seeking a modification to the plan, do you wish to appear in person at the public examination?

Yes No

B6. If you wish to appear in person, please briefly outline why you consider this necessary.

B7. Do you wish to be kept informed of planning policy matters?

(please tick as appropriate)

Please keep me informed of the progress of this Local Plan:

Please keep me informed of all planning policy matters:

How should Reading develop in the next 20 years?

Reading Borough Local Plan - Consultation on Pre-submission Draft Local Plan

The final draft of the new Local Plan for Reading is entering an eight-week public consultation. The Local Plan outlines how Reading will develop up to 2036. The Local Plan, once adopted, will be the main document that informs how planning applications are determined and covers a wide variety of strategic matters, policies and specific sites for development. The plan proposes the following:

- **Housing need** - 671 homes to be provided in the Borough each year, around 50% in Central Reading, 20% in South Reading and 30% in remaining areas of the Borough. This iteration of the pre-submission draft includes a new policy to guide Build-to-rent development;
- **Employment need** - protection of existing employment space and provision of new warehousing and industrial space primarily at Island Rd;
- **Sustainability** - expectation that new development will have high levels of environmental performance and electric car charging facilities;
- **Heritage** - substantially expanded heritage policies outlining a positive strategy for conservation and enhancement of Reading's heritage;
- **Open Spaces** - key open spaces remain subject to strong policy protection, including a new designation for Local Green Space;
- **Major transport projects** - including Mass Rapid Transit, Green Park Station, Reading West Station, Cow Lane Bridges and National Cycle Network Route 422; and
- **Identified sites for development** - as shown on the Pre-Submission Draft Proposals Map.



What is the process for adopting the plan?

Local plans take some time to prepare, with a number of stages to go through. A final plan is not expected to be in place before the end of 2018.

We intend to take your responses to this consultation into account and submit to the government in February or March of 2018. After submission, a public examination of the plan will take place. If the plan passes examination, it can be adopted as our official policy.

How to find more information

The full Draft Local Plan is on the Council's website at: <http://www.reading.gov.uk/newlocalplan>. Copies can also be viewed at the Civic Offices, Bridge Street, Reading, RG1 2LU (between 9 am and 5 pm on weekdays) and in all Council libraries (during normal opening hours).

The Council's planning policy team can be contacted at 0118 9373337 or planningpolicy@reading.gov.uk

Various background documents are also on the Council's website, including a Sustainability Appraisal (which considers what the environmental, social and economic effects would be) and an Infrastructure Delivery Plan (which considers what infrastructure will be needed to deliver growth).

How to get involved

Written responses: Please provide written responses to the consultation by 5 pm on 26th January 2018. Responses should be sent to:

planningpolicy@reading.gov.uk Planning Policy Team, Reading Borough Council
Civic Offices, Bridge Street
Reading
RG1 2LU

Drop-in events: Come and speak to a member of the team in an informal setting. There is no need to let us know if you wish to attend beforehand.

Civic Offices, Bridge Street, RG1 2LU (main reception)

Wednesday 6th December from 1:00 to 6:00 pm

Tuesday 12th December from 2:00 to 7:00 pm



APPENDIX 4: COUNCIL'S PRESS RELEASE

RESIDENTS, businesses and organisations will have a final opportunity to comment on a 20-year planning blueprint for Reading in a public consultation exercise which begins later this week (Nov 30th).

Throughout the year Reading Borough Council has been developing its Local Plan – a key strategic planning document to help guide future development in the town up to 2036.

The plan sets out how and where the Council will tackle meeting the substantial needs for development, including new homes, and how that will be balanced against the need to protect and enhance those aspects that make Reading unique. When adopted, the Local Plan will become the main consideration in deciding planning applications in the local authority area.

A draft Local Plan has evolved following two phases of public consultation over the last two years, which attracted more than 350 representations. A meeting of the Council's Strategic Environment Planning and Transport Committee (SEPT) earlier this month agreed the final phase of consultation, before the document is submitted to the Secretary of State, for examination in the Spring.



Cllr Tony Page

Tony Page, Reading Borough Council's Lead Member for Strategic Environment, Planning and Transport, said:

"This is the final phase of public consultation on what is a key planning document which will play a major role in helping to shape Reading over the next 20 year period.

"The level of demand for housing means Reading will continue to face huge demands, but it is essential development is balanced with the right infrastructure.

"Feedback received in the two previous phases of consultation show general support in trying to accommodate the estimated 671 homes every year Reading needs over the next 20 year period. What is clear however, is that Reading does not have the space available to accommodate that level of housing within its own boundaries, and we will need to work with neighbouring authorities to consider how all housing needs in the west of Berkshire area can be met."

The consultation on the draft Local Plan will begin on Thursday November 30th and run for a period of 8 weeks. The Local Plan will be made available **from Nov 30th** on www.reading.gov.uk/newlocalplan . People will have until Friday 26th January 2018 to feedback.

Following consideration of all public responses following the final consultation phase, submission of Reading's Local Plan to the Secretary of State is scheduled for February or March 2018. An independent Inspector will then examine the plan and determine whether it is 'sound' and legally compliant and therefore can be adopted.

APPENDIX 5: PRESS ARTICLES

<http://www.getreading.co.uk/news/property/final-chance-people-reading-say-13964998>

APPENDIX 6: EXHIBITION BOARDS FOR DROP-IN EVENTS

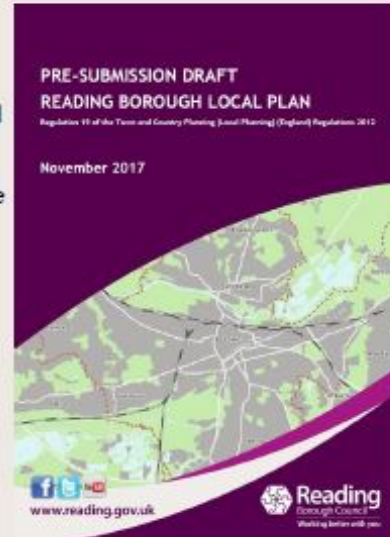
What is this consultation about?

This consultation is part of the process of drawing up a new Local Plan for Reading. The Local Plan will include all of the planning policies for Reading, and will deal with how much development there should be, where it should be, what forms it should take, and what should be protected from development.

This stage is a 'Pre-Submission' draft plan, our final draft before we submit it to the government for approval. It includes an overall strategy and levels of development for the Borough up to 2036, proposed sites for development and protection, and detailed policies for dealing with planning applications.

Some of the headlines are:

- Planning for 671 new homes per year;
- New employment floorspace, particularly for industrial and warehousing;
- Sites to deliver the above levels of development;
- Retain the existing approach to a number of matters, including seeking provision of affordable housing;
- A greater focus on heritage;
- Areas of 'Local Green Space' identified; and
- A concentration of much of the development proposed on the centre and south of Reading.



How can I get involved?

At the same time, we have worked with our neighbours at West Berkshire, Wokingham and Bracknell Forest to look at where growth can be located within the wider area. This work has also informed our Local Plan.



We have also taken account of your comments at Draft Local Plan stage. Those comments, together with a Council response, are summarised on our website.

The consultation runs until Friday 26th January 2018.

We welcome any comments that you have.

You can comment by writing to us at:

planningpolicy@reading.gov.uk

Planning Policy Team
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

You can find more information on our website, at www.reading.gov.uk/newlocalplan

Where we are in the process:



We are at the third stage of the process, a Pre-Submission Draft Local Plan. This has taken account of responses received on the Draft Local Plan earlier in the year, as well as evidence, national policy and work with neighbouring authorities. This is our final draft, and is what we plan to submit to the government for examination. Your comments will be considered as part of that examination.

A new Local Plan, when finalised will replace existing planning policy documents:

Core Strategy
(2008)



Reading Central
Area Action Plan
(2009)



Sites and Detailed
Policies Document
(2012)



APPENDIX 7: SUMMARY OF LATE REPRESENTATIONS RELATED TO CA1b – READING GOLF CLUB

The land making up site CA1b: Reading Golf Club was submitted to the Council's Call for Sites in March 2014 by Bewley Homes, with the support of the Golf Club. After consideration through the HELAA process, this resulted in the proposed allocation within the Pre-Submission Draft Local Plan for part of the Golf Club site adjoining Kidmore End Road to be developed for 90 to 130 homes and a new clubhouse. This proposal would be dependent upon the Golf Club being able to secure land for two replacement holes, which would almost certainly be within South Oxfordshire. South Oxfordshire District Council does not have an in-principle objection to additional land being used as part of the golf course, but proposals will need to be treated on its merits.

More recently, we understand that the Golf Club has been discussing with its membership an aspiration to release the whole site (which is within both Reading and South Oxfordshire) for development, which it believes can deliver several hundred new homes. This proposal became widely known in the local area in January and February 2018, but has not been formally put forward to Reading Borough Council for consideration, either for inclusion in the Local Plan or as a planning application. As such, the Council has in no way advocated or endorsed this proposal, nor provided any formal comments to the Golf Club on it. It is not included within the Local Plan for Reading or for South Oxfordshire. There are clearly a number of significant issues that would need to be taken into account with such a proposal, and would need to be assessed if and when it is formally submitted. It would also require extensive co-operation with South Oxfordshire District Council. This would of course require further consultation, either as part of the local plan or as a planning application.

As a result of information about these proposals being circulated around the local area, a number of representations concerning development at Reading Golf Course were received after the close of the consultation period (26 January 2018). These representations were sent to various Council officers and Councillors, and often copied into South Oxfordshire District Council and local MP. Of the 166 individuals who made a representation, the vast majority of respondents expressed serious concerns about infrastructure and opposition to development in the area.

The following issues were raised:

- Some respondents have no objection to the smaller site identified in the Local Plan for development, but object to the development of the entire course. Others object to any residential development at all, in some cases anticipating that more development would follow.
- Traffic congestion and highways – Residents are concerned that a housing estate would create more traffic in an area already experiencing congestion. Effects on Kidmore End Road were mentioned many times since the road is effectively single lane due to parked cars. Others noted that the road surfaces in the area are already poorly maintained and in need of repair. Many respondents emphasised the need for a third Thames Bridge. They add that the new development would not be accessible by sustainable modes, such as walking and cycling or public transport. Others were worried about road safety and limited parking.
- Lack of affordable housing – Respondents stated that because of high house prices in the area, inclusion of social housing is unlikely.
- Natural resource use – Water resources are under stress in the area and increasing the number of homes would increase gas consumption.

- Healthcare infrastructure – Residents report that doctors’ surgeries are full and it is often difficult to get an appointment.
- Open space – Residents recognised the golf course as open space that serves wildlife and residents, providing a tranquil setting where residents can experience nature.
- Leisure – Respondents expressed that the golf course provides an area of informal and formal recreation for the wellbeing and health of local residents. The Golf Club has served this community for over 100 years.
- Wildlife – Residents have observed deer, bats, foxes, owls, kites, badgers and other wildlife on the golf course and appreciate tranquil areas of grassland and woodland. Others expressed concern about protecting large trees on the site.
- Environment – Some noted that development would limit the area’s ability to absorb rainwater, as well as increase pollution and generate noise. Some expressed concern that poor air quality would harm health, particularly that of older individuals and children. They believe that the golf club serves as a “green lung” helping to clean local air and absorb CO₂ emissions.
- Education and school places – Respondents are concerned that schools in the area cannot cope with additional pupils. Some cited disappointment that a school was not constructed at Bugs Bottom and fear that new development on this site would also omit a new school.
- Employment – Many stated that there are no employment opportunities in Emmer Green for residents.
- Landscape – A few respondents stated that the development would harm views of the Chilterns and nearby Area of Outstanding Natural Beauty.
- Water and sewerage – Respondents expressed doubt that the proper water and sewerage infrastructure would be in place to serve new development.
- Many respondents believe that development on the golf course contradicts the Council’s commitment to prioritise brownfield land for development. Respondents believe that there is sufficient brownfield land within the Borough to meet housing needs.
- Many respondents expressed concern about other sites for development just over the border with South Oxfordshire, particularly the Gladman proposal on Peppard Road, and the cumulative effects of development on infrastructure and traffic congestion.
- Some respondents felt that development would benefit golf club members financially with little regard for the quality-of-life of local families.
- Emergency Services – Residents expressed concern that fire and police services are already under strain due to underfunding.
- Sustainability Appraisal – Some residents questioned the conclusions drawn in the appraisal of the site and suggested that effects would be largely negative.

- Government’s 25-year Environment Plan – Some residents claimed that the allocation contradicts the aims of the Government’s recently published 25-year Environment Plan (Jan 2018).

It can be seen that most of the substantive issues set out above were also raised in some of the comments submitted on site CA1b within the plan period, and summarised in Appendix 9.

The following individuals submitted representations specifically mentioning the Local Plan:

Andrew, Lorna	James, Mr & Mrs
Bangs, Luke	Jones, Mrs J
Bishop, Rob*	Kitchingham, Lorraine
Brammer, Mike	Lovett, John & Doreen
Breadmore, Mr & Mrs G	Lunn, Giles
Bowles, Peter	Lynch, Tom
Byrne, Charlotte & Brendan	Matthew, Andrew
Cabello-Moreno, Noelia	Macro, Ian
Calder, Colin*	McConnell, Lindsey
Callan, Laurence & Patricia	McMahon, Alan & Pat
Capstick, David	Miah, Tuhin
Chandler, Daniel	Moore, K
Child, GS & EB	Morley, Philip
Coole, Sarah	Mountford, Robert
Cooper, Mr & Mrs	Murray, Elaine
Coventry, Ellis	Nash, Caroline
Davis-Wall, Larissa	Neo, Ben
Dave, A K	Neo, CK
Degortes, Sara	Nicholls, Christopher & Josephine
De Viell, Marie	Nutley, Jim & Margaret
Drayton, Terry & Sue	Page, Michele
Ellerby, Jed	Page, Rob
Faulkner, Keith & Elaine	Palarczyk, Andrew
George, Mark & Leslie	Rapson, Kevin
Goodchild, Helen & Steve	Rees, Gareth
Goslar, Christopher	Rose, James
Goslar, Cindy	Sharpe, Andrea
Grashoff, Andrea*	Sharpe, Tim
Grashoff, Greg*	Smith, Andrew
Grashoff, Sam	Smith, Harvey
Griffin, Mr & Mrs	Smith, Peter & Linda*
Hagger, Bernard & Haydee	Taggart, Ryan
Hambleton, Amy	Teer, Sigrid*
Harmer, Sam	Unsworth, Amy
Hendley, Stephanie	Unsworth, Elizabeth
Hill, Tony	Wainwright, Maria & Winston
Holland, Mr & Mrs A	Wall, Gerry
Hylton, Stuart	Williams, Steve
Jackson, Mr & Mrs	

The following individuals submitted representations making comments on development at the Golf Course generally:

Aubrey, Caroline
Baily, Suzanne & Nick
Baker, Catherine
Beasley, Anna & John
Beavis, Roger
Bingley, Patrick*
Bloomfield, Elaine
Booth, Mr & Mrs
Brewer, D
Brooks, M
Brooks, Ruth
Carter, Jenny & Nick
Clarke, Adrian
Da Silva, Joanne
Dyson, Sue & Ken
Eley, P R
Elliot, Nicola
Eustace, Kevin
Eyre, David & Jane
Fleming, Sean
Gardiner, Valerie
Goodall, Cyrus
Goodall, John
Hall, John
Hammond, Paul
Harmer, Geoff
Harcourt, Jamie
Honey, Diane
Hudson, Rachel
Hyden, Murray
Ilsley, Sandra
Jenkin, Ann
Jones, Jonathan
Jones, Mrs
Jones, Richard and Doreen
Keene, Barry & Jill
Kumar, Rupesh
Lamb, Nick
Lambden, David
Lang, G
Lindsay, Irene
MacFarlane, Ashleigh
Maitland, Mr & Mrs
Maitland, Oliver
Morgan, Patricia

Monteith, Herbert
Morley, Briony*
Morley, David*
Morley, Kim*
Morley, Philip
Nash, Hilary & Rosalind
Nath, Geeta
Nelson, Sarah
Oldfield, Stephanie
Orr, Clive
Pattinson, Ben
Plum, Tristan
Ponting, Colin
Ponting, Ruth
Powell, Clare
Purnomo, Jane
Reeve, Anthony
Rendell, Peter & Linda
Riddle, David
Rigler, Joseph & Kathryn
Roy, Sarah
Rushton, Ivan & Pam
Russell, James & Carole
Scammell, Toby
Scott, K H
Shah, Louise
Sharma, Viren
Smart, Claire
Smith, Michael
Suddaby, Mr C W
Sun, Hualin
Thorne, Jeff & Jane
Tindall, Mary
Thomas, Ian
Tomlin, Peggy
Walker, G
Walker, Janice & Tony
Wells, Ann
Wheeler, Robert and Debra
Willans, Eileen
Williams, Izzy & Val
Wills, David
Wilson, Margaret
Woodgate, Siobhan

The following individuals voiced support for the allocation, if the appropriate infrastructure is provided:

Craggs, John

Gerard, France

Gwyther, Patricia

*These individuals made formal representations during the Local Plan consultation period in addition to late representations related to Reading Golf Club.

APPENDIX 8: SUMMARY OF PROPOSED CHANGES TO THE SUSTAINABILITY APPRAISAL

This note provides a summary of proposed changes to the Sustainability Appraisal according to representations made during the consultation period. Detailed summaries of each representation are included in the full summary in Appendix 9.

Respondent	Suggestion	Change proposed
Environment Agency	We are concerned that some sites have been flagged in the Local Plan with the statement ‘Address any contamination on site,’ while others have not. We are concerned that this suggests that sites without this statement are uncontaminated. Whilst this discrepancy has been amended in the Nov 2017 draft for CR13d and WR3q, but not for CR14a, SR1a, SR1b, SR1c and SR4d.	No change proposed to the Sustainability Appraisal. It should not be assumed that sites without this statement are uncontaminated. The SA seeks to assess overall economic, environmental and social sustainability and should not serve as a detailed assessment of contamination.
Phillimore Successor’s Settlement Trustees	It is not clear why the appraisal for Land to the Northeast of Reading has concluded that there would be harm to landscape character, health and education infrastructure and transport. This area has no inter-relationship with the AONB and the Local Plan clearly states that health, education and infrastructure would be provided. We also disagree that this area is subject to flooding.	Do not agree. No change proposed. The appraisal refers to a very large area for urban extension that far exceeds the size of the client’s land at Playhatch. Thus, although development on the land at Playhatch may not bring harm to landscape, health, education and transport, a large urban extension is likely to harm to the AONB. In terms of health, education and transport, the appraisal seeks to estimate the ease of mitigating impacts. Due to particular constraints, such as the barrier provided by the Thames River and oversubscribed schools and surgeries in the north of the Borough, impacts in the north would be more difficult to mitigate than in the South, where there is very little risk of flooding, more capacity in schools and surgeries and no major transport barrier.
Studios Construction (Reading) Ltd	Currently within Reading’s adopted Development Plan, there is not a specific policy which relates to student accommodation. This therefore is most closely aligned with option i. As the term ‘close to’ could be interpreted as a sustainable distance from, rather than immediately adjacent to, it is considered that the SA may not directly relate to the policy wording. Inconsistencies explained below: <ul style="list-style-type: none"> Option ii – There is no evidence that the student accommodation would have anything less than positive impacts on objective 20. Option iii – it is considered that objectives 4, 9, 13, 16 and 20 do not take account of 	Change proposed to change ‘close to’ to ‘adjacent to’ the university so as to most accurately assess the policy within the Plan. No change needed regarding option ii – the appraisal states ‘tendency towards positive effects.’ No changes proposed regarding option iii and objectives 4, 9, 13, 16 and 20. Economically, students are still very likely to visit the town centre even from student accommodation at the University. The areas are well-connected by public transport. If new student accommodation was not possible on sites adjacent to or on

	<p>the negative effects associated with locating student accommodation in one area of the town, i.e. proliferation of HMOs and pressures on housing generally. Outside of term time, areas can feel abandoned. Economically, students are more likely to visit the town centre if they live closer. Other consequences include restricted access for developers, reduction in supply and reduction in choice for students.</p>	<p>campus, the policy allows for flexibility with the language ‘unless it can be clearly demonstrated how the proposal meets a need that cannot be met on adjacent sites’. This will ensure choice for students and access for developers where there is a need. Do not agree that there are negative effects out of term time. Reading University hosts a large number of international students many of whom may remain during holidays. Additionally, sites will be well-integrated with the surrounding areas.</p>
Thames Properties Limited	<p>We are generally supportive of the conclusion for policy EM3 and WR3a. However, Richfield Avenue CEA is unlikely to benefit in the long-term to being restricted to pure or traditional employment uses and the Local Plan should allow for greater flexibility to allow ancillary commercial uses that would enhance vitality and viability.</p>	<p>Change proposed to account for economic benefits of limited commercial uses on the edge of a residential development (option ii, change 18 from ?X to ✓X).</p>
Thames Properties Limited	<p>We do not believe the assessment for WR3a adequately assesses the element of the policy that allows for commercial uses on the western edge of the site. The conclusions drawn in the SA do not support the policy, but rather the re-use of the site for residential. The inclusion of commercial uses has the potential to have a negative or tendency to negative impact of Objectives 5, 6 and 12, but this is not assessed.</p>	<p>Change proposed to account for economic benefits of limited commercial uses on the edge of a residential development (option ii, change 18 from ?X to ✓X). Do not agree that these objectives have not been assessed. Objectives 5 and 6 indicate both positive and negative effects for all development options. Do not agree that commercial uses will increase the likelihood of crime (objective 12) any more so than general employment uses or residential use.</p>
Thames Properties Limited	<p>The SA assesses Policy WR4 and concludes that the most preferable option is to allocate the site for Traveller pitches as it will reduce unauthorised encampments in the Borough. However, the SA also acknowledges that the proposed allocation will result in a negative tendency to negative impact on 9 of the SA objectives. According to the SA, this is a worse outcome when compared with the assessment of one of the alternative options, which is to develop the site for offices/leisure/retail. We therefore consider the Policy WR4 is not sufficiently supported by the SA.</p>	<p>It is important to note that the SA is a qualitative, not a quantitative exercise. Thus, negative impacts are not necessarily a reason to avoid development entirely. A negative impact simply indicates a need for mitigation. In this case, we believe that any negative impacts can be sufficiently mitigated.</p>
University of Reading	<p>The University supports the conclusion made in the assessment of ER1c. However, given the significant housing need and shortfall of planned housing marginally below 1000 dwellings over the plan period, we would recommend that the number of dwellings on the site could be higher than 12-18</p>	<p>Noted. No change needed. The supporting text in the Local Plan indicates that the capacity of sites will ultimately depend on factors addressed at application stage.</p>

	and that 20 dwellings could be delivered subject to suitable layout and design.	
University of Reading	While the University supports the conclusion to allocated 16-25 dwellings on site CA1a (restricting development to Flood Zone 2), we recommend that option iii is given further consideration in light of the significant housing shortfall included within the Draft Plan. It is considered that a greater proportion of the site can be developed, subject to technical work appraising the ability to mitigate any potential negative impacts on flood risk on neighbouring properties and/or land, and the potential for adverse impact by virtue of flood risk on proposed dwellings.	Noted. No change needed. The supporting text in the Local Plan indicates that the capacity of sites will ultimately depend on factors addressed at application stage.
University of Reading	<p>The ability to provide student accommodation is key to ensuring that the University of Reading maintains its reputation and continues to make a major contribution to the town's economic success. In the assessment of H12 –</p> <ul style="list-style-type: none"> • Objective 4 – There is a significant difference between option ii and option iii. The University would support option iii if it includes locations where students would be able to access campus via sustainable transport modes. Objective 4 appears to incorrectly assess this. Option iii should reflect accommodation where possible, but where this is not possible in other locations where students can use sustainable transport modes. • Objective 9 – The Council consider that options i and ii would have a tendency toward negative impacts, but it unclear why. Appropriate distribution of student accommodation would not have a negative impact. This seems to contradict the benefits of HMOs in creating more flexibly let housing. • Objective 13 – The distinction between the impacts of ii and iii is unclear. The Council should fully consider that insufficient student accommodation leads to other pressures on general market housing and affordability. Thereby, concentrated and purpose-built student housing would have the opposite effect. • Objective 16 – We believe that option ii or iii would support the achievement of this objective. • Objective 20 – The University does not see there to be any distinction between 	<p>Option iii and the draft policy do not refer to areas accessible to campus via sustainable transport modes. Change proposed to change 'close to' to 'adjacent to' the university so as to most accurately assess the policy within the Plan. Options i and ii bring a tendency toward negative impacts with regard to townscape character as the proliferation of HMOs can bring negative effects. HMOs can bring positive effects to housing by providing flexibly let accommodation, but can also bring negative effects to townscape character. The effects related to objective 13 vary between options ii and iii. Option ii may result in the loss of sites in the town centre for housing for the general population, thus limiting units and decreasing affordability. Option iii would prevent these pressures on town centre sites. Agree that options ii and iii would support objective 16. This is stated in the appraisal. With regard to option 20, please see clarification above. Change proposed to change 'close by' to 'adjacent to'.</p> <p>Option iii and the draft policy do not refer to areas accessible to campus via sustainable transport modes. Change proposed to change 'close to' to 'adjacent to' the university so as to most accurately assess the policy within the Plan. Options i and ii bring a tendency toward negative impacts with regard to townscape character as the</p>

	<p>options ii and iii. Both options would support access to education, providing that new accommodation would facilitate access to the campus.</p>	<p>proliferation of HMOs can bring negative effects. HMOs can bring positive effects to housing by providing flexibly let accommodation, but can also bring negative effects to townscape character. The effects related to objective 13 vary between options ii and iii. Option ii may result in the loss of sites in the town centre for housing for the general population, thus limiting units and decreasing affordability. Option iii would prevent these pressures on town centre sites. Agree that options ii and iii would support objective 16. This is stated in the appraisal. With regard to option 20, please see clarification above. Change proposed to change 'close by' to 'adjacent to'.</p>
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Changes that could be made to the Sustainability Appraisal of the Pre-Submission Draft Local Plan above are minor, and do not alter the overall appraisal of the various options. Therefore, the Council continues to rely on this version of the Sustainability Appraisal.

APPENDIX 9: SUMMARY OF WRITTEN RESPONSES

Please note that this schedule contains summaries of the representations received, in order of the Local Plan document. For full text of the representations, please see the full versions at www.reading.gov.uk/localplanexamination.

Please note that the responses set out are officer responses and have not been formally agreed by Council.

Respondent	Section of the Plan	Summary of the representation	Officer Response
Campbell, Ian	General comments	<p>A. ACKNOWLEDGEMENT & SUMMARY 1. This response follows comments made in previous consultations sent in January 2016, February 2016 and June 2017 and the Council’s response. 2. Once more I say why in my opinion the Council’s housing policies over many years significantly increases the cost of accommodation for local residents and will continue to do so. This outcome, a major policy catastrophe, can only be avoided with a radical change in direction. 3. Your draft local plan policies appear blind to the cost of young people of restraint-based housing land policies. In my opinion, you repeat the historic, widespread error shared by many other councils, of allowing defective process (despite the fact that the Government White Paper Feb. 2017 recognition that the system is broken) to block widely held wishes at all levels for a deliverable solution to the housing crisis: simply one which will eventually make homes at all levels affordable once more. 3A. Finally, I suggest a solution is in the hands of Reading Council and put forward an initiative Reading Council can, on its own, take. B. KEY DIFFERENCES: Do restrictions on new housing supply force up house prices and rents? 4. Twice in your responses you reject my argument that high house prices are the fault of Reading’s housing policies over many years. I continue to think you are wrong. The error is a fundamental defect in the new draft Local Plan. It invalidates many of the other basic assumptions in the new draft. 4A. You also say ‘The Local Plan does not set out to return house prices to ‘normal levels.’ Is this not precisely what the government eventually wants to achieve? Why do you not respond with realistic land supply proposals to deliver this result? 4B. WHO CONTROLS HOUSE PRICES? You also refute my comment that house prices are wholly within the ability of councils to control. I do not agree with you. As local councils have total control of the amount, location and timing of the supply of building land, which is the key ingredient needed to build new homes. With due respect, it is the Council who is wrong. It is a profound error. It shows a lack of</p>	<p>No change proposed.</p> <p>We do not propose to re-cover old ground in responding to this representation, as the Council has responded to these representations in the past.</p> <p>Ultimately, the solution proposed in this representation is a long-term, very large urban extension in a location on less constrained land in the Western Berkshire HMA area, which may well be to the South of Reading in the direction of Basingstoke, but in any case would not be on land within Reading Borough. The suggestion is that Reading should take a lead in pushing forward this longer –term vision. The representation does not want changes to the document – rather it wants an entirely different type of document altogether.</p> <p>Without getting into the merits or difficulties of such an approach (and the Council considers that joint work on wider solutions to growth issues in the area is underway, as evidenced by the West of Berkshire Spatial Planning Framework), it is difficult to see why it is necessarily incompatible with the Local Plan as drafted. Surely meeting a proportion of needs within the urban area at a high density and well-served by public transport (as set out in the Local Plan) can complement an urban extension to help meet wider and long-</p>

		<p>understanding of power of the local plan to create or prevent local levels of affordability. 4C. You do not explain why you think housing supply is not subject to the basic economic rules of supply and demand that apply to all other goods and services. You do not accept policies to restrict the supply of new housing will not force up house prices. Your rejection, although common amongst some councils, causes misgoverning and is contrary to widely held expert opinion. 4D. PROCESS OR PROGRESS? Your approach is excused by suggestions that you have no other choice. If this is the Council's belief, it is abdication of Council responsibility. You seek to place process in the way of progress by saying the Local Plan is not the right place for the issue to be resolved. This is unconvincing and stops sound policy making. It conflicts with government policy intended to significantly increase the supply of new homes. It is also plainly not in the best interests of the residents of Reading who will carry an accommodation cost burden that wiser housing policies would remove. 5. Here are three facts which show your view on this important point is not accurate: 1) House price/salary ratios are now about 12:1. Twenty five to thirty years ago the ratio was less than 3:1. About this time and earlier was when local council land supply polices intended to protect Berkshire's open countryside began to reduce the supply of new housing. For social reasons, demand was increasing but supply was reducing and forcing house prices upwards. 2) The impact of severe restraints on new housing supply were pointed out at the time and ignored. These misguided control attitudes and their consequences on housing prices were clear long ago. They are now stark in the harsh evidence of unaffordability. 3) In July 2002, Professor Alan Evans, at the time Professor of Environmental Economics and Pro Vice-Chancellor at the University of Reading in evidence to the House of Commons Select Committee on Transport, Local Government and the Regions argued that planning policies of constraint can increase the price of developable land and housing and are politically popular because rising house prices benefit those who already own a home. 6. For Reading Council to maintain these policies will continue to make</p>	<p>term needs. The work that it is suggested is undertaken would not need to be instead of moving forward with a Local Plan. The representation suggests that the Local Plan should essentially abdicate its responsibilities to meet as much of its own need as possible under the NPPF and essentially be transformed into a kind of advocacy document for development in other local authorities. It is our contention that it is not the place of the Local Plan to do this.</p>
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		<p>new homes more and more unaffordable and perpetuate failed supply policies that are in conflict with government announcements. This reveals a worrying lack of understanding the best interests of Reading's future residents. C. ANOTHER DIFFERENCE: Can a Sustainable solution be found? 7. Besides increasing the future supply of new homes, Reading Council must take the lead in helping to find new sites for housing on a major scale within its travel to work area. Failure to pursue a housing policy which will eventually return prices to affordable levels means this plan must be deemed by the inspector to be unsound. 7A: WELCOME PROGRESS Some welcome strategic progress is apparent when this Pre-Submission draft is compared with the first draft published in late 2015. The Council is seeking to fulfil its Duty to Cooperate with some, but not all of its neighbouring councils through its participation and support for the West Berkshire Strategic Plan. This initiative is based on new, more farsighted thinking is a welcome start, but is partly good and partly bad. The Foreword is encouraging. The content is weak, and shows limited understanding of the need for council policy to set the agenda and to lead the market. Instead once again it follows market operations. In protecting Berkshire's and the Thames Valley's pleasant land in the decades ahead this policy, which is re-active not pro-active, will fail again with the usual negative outcomes. 7B. Recognition by four authorities of the need to work together is a welcome first step. So too are commitments to a strategic approach, and pursuit of land value capture for the community. 7C. On the other hand the WBSP contains no long term vision. Once again, what happens after 2036? Will that date be followed by another cycle of suburbia tacked onto the south edge of Reading? 7D. The WBSP has a second weakness. The area captured by the four councils reflects the SHMA approach. It does not reflect Reading's travel to work catchment area which is much larger and economically relevant. 7E. WBSP FAILINGS Third and critically, the WBSP initiative also contains a major spatial error. Seen as an easy quick-fix and superficially appealing solution, much of the new build needed on open land solution is solely</p>	
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		<p>dependent upon an opportunistic commercial initiative by a consortium of land owners and builders to build on a site of their, not the councils, choice. Reliance on developers' leadership is a disappointing abdication of responsibility. The selection of the site for the Grazeley project for 15,000 new homes is not the result of a rational, sequential approach. Without first obtaining independent verification, how do the four councils know Grazeley is the right location? This is not possible without evidence. 8. In my submission June 2017, I describe a rational approach for site finding which you have published with your responses online. This step by step approach sets out the methodology to identify big sites for large scale new home building in the Thames Valley for two generations ahead. Before decisions are made on specific locations like Grazeley, this site options research must be carried out to identify all sustainable, unprotected locations within Reading's travel to work area where large scale development is possible. Until this evidence is available, the suitability and capacity of Grazeley and the other open land sites mentioned in the draft cannot be rationally tested against alternatives. This is a major oversight. It must mean this draft is not sound. 8A. Reading is the main economic business centre in the Thames Valley. Its role as a prosperity generator west of London is paramount. It will continue to extend its importance relative to other business centres like Slough, Oxford and Basingstoke to a far greater scale than is generally recognised. Where will these new workers live? For this reason, Reading and its neighbours needs a strategic, long term housing supply policy. The WBSP is inadequate. To address this omission I recommend professional advice is obtained by the Council and attach below at Appendix A a possible first step which is exclusively within the council's control. D. THE NEED TO RECOGNISE THAT READING AND THE THAMES VALLEY FACES A UNIQUE CHALLENGE 9. Reading is at the heart of an area that locally must support government housing priorities by putting process second and results first. Central Berkshire and much of the Thames Valley will be the principal host area for future growth in the Home Counties west of London. 9A. OFFICIAL FAILURE After all the</p>	
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		<p>government candidly says in the February 2017 white paper the housing market is broken. Put differently, the Thames Valley housing policy supply mechanism contained in previous local council plans over many years have officially failed. The delivery system is broken. Something must be changed. Now is the time. This failure must be faced: it cannot be ducked once more. As Reading on its own cannot solve the crisis, the Government must offer Reading the necessary support. Announcements by the Prime Minister and Housing Ministers make it clear, if asked, they are willing. Reading Council must now take the first step.</p> <p>9A. THE HOST LOCATION Over the next few decades, central Berkshire will continue its historic role as a host location. Reading and Central Berkshire will accelerate its host role as the preferred location for major employment and housing growth as other heavily protected areas to the east and west of Reading, and London boroughs located on the west side of the Greater London area are compelled to look elsewhere for overspill locations. For example, South Bucks, Windsor and Maidenhead and most of Surrey County are located in protected policy areas where large scale housing growth cannot take place. Most of their land is greenbelt. But their open land, unless it has AONB protection, as well as greenbelt protection, it is at risk of development after the current cycle of local plans ends in the 2030's and the search for more building sites starts once again. Their alternative will be to look at unprotected land close by. For example, for some councils in Surrey, parts of Berkshire and Hampshire will become target locations for their own overspill needs. Thames Valley councils need to be thinking about these challenges now.</p> <p>9B. An illustration makes the point. Another Thames Valley council with similar housing supply problems due to lack of development land and strong growth pressures, is surrounded by open land north and south, east and west but all of which is protected by greenbelt policies has identified land well suited to development for its overspill. It has taken a bold, unilateral step.</p> <p>10. In September 2017, Slough Borough Council published a report commissioned from consultants on the Slough Northern Extension. It proposes an urban extension to Slough to the</p>	
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		<p>north beyond Slough’s boundaries and into greenbelt land. 11. In the preface, two Slough councillors say a large number of objections were received from local residents who were unable to identify other reasonable options for the additional housing Slough needs. Within the report there is also an important covering note from two Chiltern and South Bucks councillors saying their councils do not support Slough’s policy for a northern extension onto their land. The lack of local consensus is not ideal, may hinder optimal solutions and suggests the Duty to Cooperate is failing. 12. Because Reading and the Thames Valley growth potential is unique, and because the government’s February 2017 white paper candidly recognises the planning system is broken, in the Thames Valley it is time for Reading to take a high profile lead in finding a new comprehensive deliverable solution not only for its own needs, but also the need for those other Thames Valley residents dependent upon Reading for their economic livelihood. Failure to do so seems contrary to explicit aspirations of this government.</p> <p>GOVERNMENT ASPIRATIONS. “Our broken housing market is one of the greatest barriers to progress in Britain today. Whether buying or renting, the fact is that housing is increasingly unaffordable, particularly for ordinary, working class people who are struggling to get by. [...] We need to build many more houses, of the type people want to live in, in the places they want to live. To do so requires a comprehensive approach that tackles failure at every point in the system.” (Foreword by Prime Minister in the February 2017 White Paper, Fixing Our Broken Housing Market, DCLG) “Soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation.” (Foreword in the same February 2017 White Paper by the Secretary of State for Communities and Local Government.) 13. LOCAL RESISTANCE.</p> <p>Government sentiment is plain. But locally, there is a problem looming. Despite these high level Ministerial statements it is clear that some councils in the Home Counties intent to resist government pressure for many more new homes. At local community level there will be</p>	
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		<p>considerable grass-roots support for such resistance from some local residents. Surrey County's 11 Council leaders say they refuse to even try to meet 'unrealistic and unacceptable housing targets 'which would require 'concreting over greenbelt' (GetSurrey, Dec. 2017). Surrey County has a very big, maybe unique challenge as around 90% of their undeveloped land is classified as greenbelt. What are they to do? One local councillor, Tandridge District Council leader, Cllr. Martin Fisher says Surrey's 11 council leaders 'do not accept' new government proposals which see the number of new houses expected to be built across each local authority area in Surrey rise by as much as 40%. If so, where will these homes go? Into Sussex, where much of the land is also protected, or Berkshire and Hampshire, each with plenty of unprotected land? There is, it seems, nowhere else. Rural councils in the Thames Valley with plenty of unprotected land close to strong employment centres like Reading need to think much further ahead. They face far stronger economic pressures than Surrey's dormitory communities. For some councils, it will amount to a reversal of earlier mind-sets. Initially this will be unwelcome. There are steps to prevail over resistance if site selection is led by the council, not by developers, is transparent and the delivery timescales are sensible. 14. From Reading's perspective, as the Thames Valley employment growth pressures are far greater than Surrey's it seems logical to focus major new housing building in these white land areas in locations which anticipate future hosting based demand arising elsewhere. Locally, long term, national environmental policies can then be upheld in the remaining protecting areas whilst the growth is absorbed and put to good advantage for the locality. E. SOLVING THE THAMES VALLEY HOUSING CRISIS. A threat or an opportunity? 15. Why are local leaders intimidated by new housing proposals? It is because they come under immense pressure from local residents to resist change, who see any local change to the quality of life for existing residents living in the area identified? Disappointing urban design solutions and inadequate support for several decades explains why local residents, often with good reason, view new housing projects near them</p>	
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		<p>with horror. 16. LOCAL DEMOCRACY In the short term this pressure cannot be, nor should it be resisted. There is no conflict between local democracy and national economic needs if strategic policy making replaces short term horizons. Sudden surprises as unknown development initiatives pop-up are evidence of weak strategic planning at the local level. They destroy local trust. Following new long term supply delivery policies, after ten to fifteen years of awareness and plan preparation these negative reactions will tend to disappear. If rational site selection policies are followed and project preparations are accompanied by compensation for those local residents who materially suffer quality of life damage, the remaining opposition will fall to lower levels. 17. Which is why long-term housing supply policies must also include land value capture, or betterment; a concept identified in both the Conservative and Labour 2017 general election manifestos and in the WBSPP thinking. Extremely high land development values in the Thames Valley open the door to local councils taking advantage of a new, very large revenue source by collecting most of the uplift in value councils development control policies will release back to their local community. In the short term, such a policy will be contentious for existing owners with justification. In the long term, ten to twenty years ahead, this change will be accepted by landowners if accompanied by enhanced compulsory purchase compensation provisions and it is clear from impartial valuation safeguards the value of their asset base is not eroded. F. NEXT STEPS 18. IS READING SPECIAL? Reading is a special case. Because of its unique accessibility advantages, Reading also has a unique challenge, and a rare financial opportunity. Reading can set an example to other councils facing similar difficulties. 18A. IT also has a rare planning opportunity. It is not totally surrounded by greenbelt or AONB like other dynamic growth centres such as Slough, Oxford and Cambridge. 19. In conjunction with its council neighbours, or unilaterally Reading Council must commission a land options report (see Appendix A below). This report will add to the Council's evidence base and will be available at the examination in public into the Local Plan. 20. EVIDENCE</p>	
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		<p>NEEDED There are several reasons why Reading Council needs to seek evidence on building land options: -house process and rents are too high. A massive increase in supply is needed over two decades to return prices to normal levels. High prices and rents are causing various problems (social, economic and personal). And due to demand pressures the expectation is the affordability ratios will continue to increase; -whilst Reading Borough is interested in the Grazeley initiative, on the existing evidence the Council cannot be satisfied all available site options for long-term housing growth in the Thames Valley have been tested. Without this additional information, it cannot confidently give official support to Grazeley; -over the last two years it is now clearer, despite widespread recognition of the need for many more new homes that the levels of resistance to new housing in protected areas in the Home Counties to the west of London is a barrier that cannot be, and ought not to be overcome in the short-term; the local housing pressures cannot be solved in a sustainable way in the twenty year cycle of current local plans; - suitable new locations for major new house building can only be identified with local support, which means all alternative location options must be examined in an open and transparent manner, with local residents input, too; -a long term housing policy will enable Reading Council, with its neighbours to ensure the quality of life of existing residents is protected whilst new compensation provisions are available for those who incur financial loss, including to their quality of life. 21. With this new evidence of sustainable building locations, if there is a proven need for massive increases in the supply of housing land somewhere in the Thames Valley Reading Council and its neighbours will have a clear understanding about the different spatial options. 22. There seems, from your responses, to be a process barrier. One solution is for Reading Council to take the land supply dilemma direct to the Prime Minister, whose Maidenhead constituency is close to Reading. In Jan. 2018 she declared it is her personal mission to fix Britain’s housing crisis. She said “We are building a Britain that is fit for the future and our message to the next generation is this—getting on and climbing up the</p>	
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		<p>housing ladder is not just a dream of your parents’ past, but a reality for the future.” (Sky News) 22A. Her commitment seems clear and it is encouraging. Your housing policies will not achieve her mission. A different approach is needed. But first, of course, local opposition must be reassured. Without this local support all initiatives will fail. The step by step solution contained in my earlier July 2017 submission that you published last summer will complete the circle and ensure the government’s policy can in due course be fulfilled, and with the support of local residents. G. NOW IS THE TIME TO PETITION THE GOVERNMENT 23. Reading and its neighbours have bunker mentality characteristics to the supply land supply deficit. Here is an escape route: an alibi, to compel all concerned to think radically. Such a cross-party local Reading petition might say: “Reading Borough Council supports announcements by the Prime Minister intended to ensure the next generation’s aspirations for housing are not just a dream. The Council is also aware of government recognition (Feb. 2017 White Paper) that the current system for delivering new housing is broken. Reading Council agrees. Based upon evidence obtained, and other general evidence including during an exhaustive two-year Local Plan consultation programme this Council is convinced that in the Thames Valley in general, and Reading in particular the planning system cannot achieve the Prime Minister’s mission without a radical change of direction of sub-regional planning policy intended to lead to a dramatic sub-regional increase in housing supply from 2030. We therefore seek government policy support for the building, over two generations of a new city, similar or larger in size to Milton Keynes or alternatively a major urban extension to the south of Reading in the direction of Basingstoke on ample open land which is not subject to national protection policies.” 24. Why identify Readingstoke? Why use the comparison with Milton Keynes? Yes, Readingstoke is not a new concept. But it identifies a large area in the Thames Valley where there is lots of unprotected land, with good access infrastructure already in place (M3; M4; Reading-Basingstoke railway line; and the Elizabeth Line due to open in 2019). The environmental barriers are</p>	
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		<p>Burghfield and Aldermaston. They must be managed. In a housing delivery cycle of 15-60+ years these can be viably directed. With medium and higher densities, and enhanced public transport links, most of the new settlement could be accessible with extremely low levels of private car ownership (cp. Freiburg). The eventual size of Readingstoke will be dictated by the market. Around 200,000 new homes in 60 years will create scope for state of the art masterplanning opportunities. It will also mean the next round of Thames Valley local planning starts from a sustainable foundation in ten or fifteen years' time. APPENDIX A Draft letter from Reading Council to spatial consultants: "THAMES VALLEY Long Term Sub-Regional Housing Needs and Delivery Options. Dear Sir, Your name is recommended to us. WE are also approaching other consultants with a view to making an appointment by xxxx. Reading Borough recently completed an exhaustive two and half year consultation on its draft Local Plan. This plan will go to the Minister shortly for approval. In the consultation process the constraints on this council's freedom to deliver the future housing needs of this area in a sustainable way have come into sharp focus. So too the necessity to look beyond the plan period (2036) to enable strategic housing policies for one to two generations to emerge. The Council intends to deliver the best accommodation solutions for its residents today and in the future. House prices and rents are at historically high ratios. Our key objective is to find the means over one or two decades to return these affordability ratios to past, long accepted norms prevailing two and three decades ago. Reading Council recognises this affordability problem is due in large part to long established, enduring restrictions on the supply of building land throughout the Thames Valley region. Reading Council now wishes to make a clean break with this historic, restraint-based approach to housing land supply which has failed. It notes the government too accepts the current system is broken. Within Reading's travel to work area, the Council is mindful of the intentions behind two Government white papers published in 2017 intended to find ways to address the unaffordability problem. It is not possible for the Council, within the</p>	
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		<p>constraints of its own Local Plan to solve the housing supply problem in isolation. But the Council wish to identify a long term delivery solution which will meet the local needs of household growth whilst protecting the high quality undeveloped parts of the Thames Valley, maintain national protection policies in long term, and reflecting the spirit of our Duty to Cooperate obligations to the fullest extent. Reading's and the Thames Valley's economic successes in recent decades have led to acute housing shortages throughout the Home Counties west of London. Affordability ratios are now at all-time highs and growing. This trend must be halted. All the same Reading Council is committed to policies to maintaining, encouraging and supporting future economic growth. Socially, there is increasing concern about local levels of homelessness. Such problems can only be overcome by sharply increasing supply of all categories of tenure in a sustainable way. The Council have therefore concluded it is time to examine radical steps to increase the supply of new homes of all tenure types within Reading's travel to work area. Unlike other dynamic economic growth areas in the Home Counties, Reading is surrounded by a mix of protected and unprotected land areas. This mix provides development flexibility. In addition, unitary authorities closer to London in east Berkshire have high concentrations of protected land (Windsor and Maidenhead, for example is 83% green belt) or in west Berkshire with large areas of AONB. It is also foreseen that some part of London's overspill housing supply problem may eventually have to be met with the western Home Counties. Above all, if recent economic growth rates continue we foresee a need after the end of the current plan period in 2036 for a further 100,000 new homes by the mid/late 2050's and 200,000 sixty years ahead. The most sustainable way forward to provide the homes needed now, and those in the future whilst continuing to protect the local rural environment and protect the quality of life of today's residents may be to pursue local land supply policies which are very different in two aspects: their spatial coverage and their time scale duration. These two changes, which will have widespread consequences, will enable a range a land and housing</p>	
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		<p>supply options to be considered which under the existing spatial and time frameworks are excluded. By looking two generations ahead, to say 2088 for example it becomes possible to divide the whole travel to work search area into two parts: protected areas where long-term national protection policies apply and must remain, and the rest. All the rest are unprotected and therefore potential host locations for future housing on a large scale looking far into the future. In order to reduce future house process pressures in Reading the supply of housing land within Reading travel to work hinterland must therefore be liberated. We recognise government support will be needed. We are confident this initiative reflects government aspirations. To make the study manageable we suggest a search area defined by four motorways or national roads, the M3, M4, M40 and A34. Your task, if appointed, will be to advise in accordance with current government policies. First, it is to identify all protected and unprotected land within the search area. Second, it is to put forward site selection guidelines which will enable local councils to identify locations for new settlements or urban extensions on unprotected land, having regard to current and future infrastructure expectations. We are not seeking to identify specific sites but rather the principles needed to define a set of tools to decide optimum site locations in the future. Some general areas will emerge through your analysis with potential advantages and disadvantages in each case, depending upon what assumptions regarding infrastructure on which each will rely resulting in a ranking of the different options. These can be identified. Please advise us how long this work will take if appointed bearing in mind we will need your report by no later than Easter 2018. Signed, Reading Borough Council</p>	
<p>Chiltern District Council and South Bucks District Council</p>	<p>General comments</p>	<p>The Draft Local Plan is not sufficiently justified. It is not effective, RBC having failed to engage effectively through joint working on cross-boundary strategic priorities. It is not consistent with the NPPF. Our representation concerns the definition of Housing and Economic Market Areas. Failings under the Duty to Co-operate have undermined the soundness of the evidence base in relation to market geography. These</p>	<p>No change proposed.</p> <p>1 - The focus of the ORS and Atkins work from 2015 is on the Buckinghamshire authorities and we do not believe it is in a position to fully define the extent of HMAs across Berkshire. That is</p>

		<p>concerns have previously been placed on formal record by Chiltern and South Bucks District Councils in responding to the Reading Borough Local Plan Regulation 18 consultation.</p> <ol style="list-style-type: none"> 1. The Chiltern and South Bucks Local Plan evidence base (specifically Housing Market Areas and Functional Economic Market Areas in Buckinghamshire: June 2016 Update [ORS & Atkins, June 2016] available at http://www.southbucks.gov.uk/planning/localplan2014-2036/evidence defines the functional housing market area for the Buckinghamshire authorities and, where relevant, the surrounding areas. This defines South Bucks District as split between two functional housing market areas: partly within a Berkshire-wide Housing Market Area with the six Berkshire authorities and partly within a functional housing market comprising the rest of Buckinghamshire. 2. The Chiltern and South Bucks evidence base goes on to apply functional housing market areas on a best-fit basis in order to provide a practicable platform for plan-making. This concludes that South Bucks District, on the basis of undertaking a joint local plan with Chiltern District, on the basis of undertaking a joint local plan with Chiltern District Council, forms part of a best-fit housing market area comprising the four Buckinghamshire districts and that there is a single housing market comprising the six Berkshire authorities. 3. The RBC Draft Local Plan evidence base (specifically the Berkshire SHMA by GL Hearn in Feb 2016) does not define functional housing market areas but defines housing market areas on a best-fit basis in order to provide a platform for plan-making. This best-fit approach is on the basis of local authority districts and not on the basis of local plan areas resulting in Eastern and Western Berkshire housing market areas with the Eastern Berkshire Housing Market Area including the whole of South Bucks District. 	<p>recognised within the study itself, at 3.1 and 3.26. Its conclusions on Berkshire are based mainly on commuting patterns, rather than taking account of the full range of issues set out in PPG, also including migration and house prices, and it is not, and does not attempt to be, a final definition of which HMA the Berkshire authorities fall into.</p> <p>2 & 3 - The approach that Chiltern and South Bucks have taken in terms of joint plan-making does not alter the functional reality of the housing market areas, and does not undermine the conclusions of the Berkshire SHMA. The SHMA follows the approach of the PAS Technical Advice Note, and is entirely robust. There is no national policy or guidance that states that plan-making boundaries are more appropriate than local authority boundaries.</p> <p>4 - There is always some form of functional relationship between neighbouring HMAs. As recognised by the PAS Technical Advice Note 13, data collection at below local authority level is not always easy, and for this reason defining the full functional area down to a fine grain of detail is not always possible. The approach of the Berkshire SHMA is considered robust.</p> <p>5 - We do not agree that it is more appropriate for HMAs to be applied to plan-making areas than to local authority boundaries on a best-fit basis. A best-fit to local authorities was</p>
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		<p>4. The best-fit approach of both local plans' evidence bases does not and cannot change the functional housing market areas affecting Buckinghamshire or Berkshire. However, the full functional housing market areas for Eastern Berkshire including South Bucks and for Western Berkshire have not been defined and the evidence provided by GL Hearn demonstrates that there will be a significant degree of functional overlap between them.</p> <p>5. We do not agree with the Berkshire best-fit approach of using district boundaries to define housing market areas as this is not an appropriate way to provide a practicable platform for plan-making given that there is a joint local plan being prepared for Chiltern and South Bucks. The emerging approach to preparation of a joint local plan was shared with GL Hearn and the Berkshire authorities in advance of the formal decision, while the public decision to do so (October 2015) was made some four months before the GL Hearn best-fit approach was finalised and published. The Berkshire best-fit approach to housing market areas is therefore not considered a sound approach by Chiltern and South Bucks Councils.</p> <p>6. The GL Hearn report is also considered out-of-date as some key base data has changed.</p> <p>7. We do not agree with the decision of the Berkshire authorities to define two best-fit housing market areas as this was not recommended to the Berkshire authorities by GL Hearn and is not supported by the Berkshire authorities' own evidence. The decision to progress based on two housing market areas was made at a meeting of the Berkshire authority chief executives before the GL Hearn report was finalised and the final GL Hearn report evidence has sought to be presented in a way to seek to justify the Berkshire chief executives' decision. We do not consider that the decision to define two Berkshire Housing Market Areas is a sound basis for planning to meet Berkshire's housing needs in the most sustainable way.</p>	<p>recommended by the PAS Technical Advice Note 13, largely on the basis of difficulties of data collection at sub-local authority level. The decision to produce a joint plan does not alter the functional realities of the area, and it is perfectly possible to produce a joint plan covering part of two HMAs.</p> <p>6 - Base data does change over time, and it would be unreasonable to consider that this necessarily renders a document out of date. A sensitivity analysis of more recent data has been undertaken for the Western Berkshire HMA, and this is included in the evidence base. However, it is worth noting that the information that has changed, e.g. population projections, employment forecasts, economic activity rates, are more relevant to the needs assessment part of the SHMA rather than the HMA definition, which is based more on information around migration, commuting and house prices.</p> <p>7 - GL Hearn clearly recommend two Housing Market Areas in the SHMA. These recommendations are made in paragraphs 2.255-2.261 of the SHMA. As is often the case with production of evidence, interim conclusions will be discussed throughout the process, and refined with further work. This is entirely normal. In this case, the initial findings of GL Hearn (which SBDC are only aware of precisely because they were kept in the loop through the Duty to Co-operate) were that the evidence</p>
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<p>Chiltern District Council and South Bucks District Council</p>	<p>General comments</p>	<p><u>Duty to Co-operate</u></p> <p>The declared purpose of the Duty to Co-operate Statement is to <i>'identify and describe Duty to Co-operate actions that have occurred during the preparation of the Local Plan and to demonstrate that the Duty has been complied with.'</i> The Statement claims to have identified <i>'any cross-boundary or strategic issues'</i> and <i>'describes their consideration with adjoining authorities, specified bodies and other organisations.'</i> The Statement fails to meet the Duty to Co-operate requirements of the Localism Act 2011 and the NPPF and the objectives set out in the Borough's Statement for the following reasons:</p> <ol style="list-style-type: none"> 1. Reading Borough Council has failed to diligently and accurately record a key strategic Duty to Co-operate issue with Chiltern and South Bucks Councils and has failed to indicate why this remains an unresolved matter. The Duty to Co-operate issue with Chiltern and South Bucks Councils and has failed to indicate why this remains an unresolved matter. The Duty to Co-operate issue is the inappropriate definition of the Berkshire Housing Market Area (HMA) geography and strong functional relationships between local authorities comprising the Eastern and Western Berkshire HMAs. For example: 	<p>No change proposed.</p> <ol style="list-style-type: none"> 1 - The Duty to Co-operate Statement has now been updated to fully report on the HMA geography issue and take account of these matters. Whether or not the last version of this Statement fully reflected the outstanding issues, this does not in itself constitute a duty to co-operate failure. The comments on the Duty to Co-operate Scoping Strategy are reported within the Strategy itself. 2 - The Council's focus has been on progressing Memoranda of Understanding with those authorities closest to us, and with which we have the greatest functional relationship. Given the limited amount of agreement on these matters, it is difficult to see what such a MoU would say and what it would add. Discussions on a MoU to include South Bucks' position are

		<ul style="list-style-type: none"> • In Oct 2015 South Bucks DC commenting on RBC's Duty to Co-operate Scoping Strategy (Sept 2015). Those comments drew attention to the conflict between the then emerging HMA commissioned by the Berkshire authorities and the then emerging HMA commissioned by the Buckinghamshire authorities. At that stage the study for Buckinghamshire identified a HMA comprising all six Berkshire authorities plus South Bucks District. The emerging study from Berkshire identified a Western Berkshire HMA (of which Reading forms a part) and an Eastern Berkshire HMA which included South Bucks District. • The Oct 2015 comments also reiterated that South Bucks District Council was considering undertaking a joint local plan with Chiltern District Council and that RBC had been consulted on the implications for HMA definition if a joint plan was prepared. • On the basis of undertaking a joint local plan with Chiltern District Council, evidence commissioned by the Buckinghamshire authorities confirmed that South Bucks District forms part of a best-fit housing market area comprising the four Buckinghamshire districts and that there is a single housing market area comprising the six Berkshire authorities. A draft consultants' report setting out the evidence was sent to RBC and other relevant Duty to Co-operate organisations on 8 Oct 2015 for comment. • As well as failing to comprehensively record the conflicting evidence on housing market geography, the Duty to Co-operate Statement fails to record the fact that South Bucks District Council has never agreed to the housing need figures for South Bucks District included in the Eastern Berkshire HMA. Nor does the 	<p>underway, but all that this is currently highlighting is the entrenched nature of the respective positions.</p> <p>3 - The purpose of the May 2017 MoU was simply to reaffirm the agreement with the conclusions of the February 2016 SHMA, in terms of the identified HMAs and the methodology and calculation of objectively assessed housing needs. Reading was not the driving force behind this MoU - it was initially requested by other authorities as it would be helpful in defending the SHMA housing numbers at appeal. RBC's view has always been that this MoU is not particularly necessary from a Reading perspective, but that if it helps other authorities we are happy to sign.</p> <p>Since the purpose of the MoU was to reaffirm the authorities' commitment to the conclusions of the SHMA, it made sense to include only those authorities that commissioned and accepted the conclusions of the SHMA in the first place. SBDC's position is well-known, in that they accept neither the HMA geography, nor the calculation of objectively assessed need for South Bucks. The local authorities had no indication that the view was likely to change, and it would not have made a great deal of sense to ask SBDC to re-state agreement with something SBDC had never agreed with at the outset.</p> <p>4 - CDC and SBDC have misread this MoU. The</p>
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		<p>Statement record the fact that South Bucks District Council has never agreed the FEMA geography defined for the six Berkshire authorities and Thames Valley Berkshire LEP.</p> <ul style="list-style-type: none"> • South Bucks District and Chiltern District Council are not listed as ‘Relevant Duty to Co-operate Partners’ in the table immediately following paragraph 2.3.6 of the Duty to Co-operate Statement despite the fact that South Bucks District is, according to Berkshire’s evidence, included in the Eastern Berkshire HMA. Likewise, South Bucks District and Chiltern District Councils are not listed as ‘Relevant Duty to Co-operate Partners’ in the table immediately following paragraph 2.4.4 of the Duty to Co-operate Statement despite the fact that South Bucks District is included in the East Berkshire FEMA as defined for Berkshire. These are significant omissions, particularly given that Chiltern and South Bucks Districts are identified as ‘Relevant Duty to Co-operate Bodies’ for the strategic issues of ‘Housing needs and provision’ and ‘Needs and provision for economic development and town centres’ in Appendix 1 of the Statement. <ol style="list-style-type: none"> 2. RBC has failed to progress a Memorandum of Understanding (MOU) with Chiltern and South Bucks Councils despite repeated requests to the six Berkshire authorities to do so. The requests date from 2015 when South Buck District Council was first invited to attend meetings associated with the Berkshire SHMA and FEMA. The requests were never supported by the Berkshire authorities. 3. The Duty to Co-operate Statement includes as Appendix 4 ‘Objectively Assessed Need for Additional Housing – Memorandum of Understanding between the Berkshire local authorities in the Western Berkshire and Eastern Berks and South Bucks Housing Market Areas, May 2017.’ The MOU 	<p>MoU, which remains unsigned by Wokingham and RBWM, is set out at Appendix 4 to the Statement. There is no intention to indicate that all six Berkshire unitary authorities will work together to meet unmet needs across the whole of Berkshire, and, in fact, the MoU reaffirms the commitment to the two HMAs in paragraphs 2.1 and 3.1.</p> <p>5 - Each HMA needs to work from the starting point that the need for housing should be met within the boundaries of the local authorities concerned. This requires HMAs to work together to understand the degree to which they can accommodate their own needs. The West of Berkshire Spatial Planning Framework is part of this process, and there is a commitment to accommodating the Western Berkshire HMA’s needs within its boundaries, and sufficient work on potential approaches to indicate that this is likely to be achievable. However, there has not been an agreement within the Eastern Berkshire and South Bucks HMA about what can be accommodated within that area, and therefore there is no figure for potential unmet need. It is not for the Western Berkshire HMA to assess the capacities of other areas and speculate about what might not be accommodated, rather the proper process should be that there should be an agreement within the HMA and then engagement with adjoining HMAs. Western Berkshire is by no means the only HMA adjoining Eastern Berkshire in any case.</p>
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		<p>includes references to South Bucks’ housing need and delivery and to the Duty to Co-operate. Publication of the Statement in November 2017 is the first timer the MOU was shared with Chiltern and South Bucks District Councils. Chiltern and South Bucks Councils were not made aware by the Berkshire authorities that the MOU was being prepared, were not invited to participate, were not informed of its existence, were not invited to participate in the evidence based work coming out of the MOU and were not informed which authorities had/had not signed the MOU until the question was posed following publication of the Statement. The exclusion of Chiltern and South Bucks Councils from the process is a fundamental failing under the Duty to Co-operate. On-going disagreements between Chiltern/South Bucks and Berkshire about the Berkshire SHMA is not acceptable justification for Berkshire – including RBC – to have excluded Chiltern and South Bucks from the MOU process.</p> <p>4. The MOU also further undermines the Berkshire evidence base on market geography by confirming that the six Berkshire authorities have agreed to work together to meet full objectively assessed need for housing (paragraph 5.1).</p> <p>5. The Duty to Co-operate Statement refers (Section 2.7) to the West of Berkshire Spatial Planning Framework. Chiltern and South Bucks note that RBC is likely to have unmet housing needs over its Plan period and that any shortfall will be accommodated elsewhere within the Western Berkshire Housing Market Area based on the West of Berkshire Spatial Planning Framework. The table immediately following paragraph 2.7.4 of the Statement identifies other Duty to Co-operate bodies that would be relevant, including Slough BC. There is no clear evidence to show a pro-active or on-going Duty to Co-operate approach across administrative boundaries for helping to address a key strategic planning matter and area of common interest, namely</p>	<p>Slough Borough Council have now made a formal duty to co-operate request to all Berkshire authorities to consider meeting a portion of its unmet need. The response from the Western Berkshire HMA has been that the first consideration should be what could be accommodated within that HMA. However, for the purposes of Reading’s Local Plan, this debate is largely moot, because Reading cannot fully meet its own needs for housing.</p> <p>6 - The reference in section 2.8 of the Statement is to an expression of interest, jointly submitted by Wokingham, West Berkshire and Reading, and to specific streams of follow-up work, not to the wider implications of any proposal at Grazeley. No other local authorities were involved in this submission, and it is right that only Wokingham and West Berkshire are therefore listed.</p>
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		<p>boosting significantly the supply of housing to provide for the unmet needs for market and affordable housing originating from Slough consistent with national policy in respect of the Green Belt. Such an approach would also be consistent with the following statement on the Duty to Co-operate comprising paragraph 5.1 of the May 2017 MOU referred to above: <i>'The six Berkshire authorities have agreed to work together to ensure that this full objectively assessed need for housing in the Western Berkshire HMA and Eastern Berks and South Bucks HMA will be met in the authorities' forthcoming Local Plan reviews, as far as is consistent with the policies set out in the NPPF.'</i></p> <p>6. Section 2.8 of the Duty to Co-operate Statement refers to a potential growth opportunity outside of the Reading boundary at Grazeley. The scale of the opportunity – up to 15,000 new homes supported by economic development and associated infrastructure – adds to the importance of wider dialogue within the framework of the Duty to Co-operate than the two partners listed in the table immediately following paragraph 2.8.4 (namely Wokingham BC and West Berkshire DC).</p>	
Climate Change Centre Reading	General comments	<p>The Local Plan is missing a Model Risk-Impact Evaluation Plan, therefore is not legally compliant. The purpose of this representation/objection is via policy innovation and risk/protection impact evaluation, to improve Reading's local urban development practices and planning, to support the British realm and ambitions to become a great global leaders in the fight against global warming. The plan is not legally compliant, is not sound and does not fulfil the duty to-co-operate. We strongly advise a one-year consultation on risk-impact with Climate Change Centre Reading and that the whole RBC get involved with the Ninth session of the World Urban Forum that will take place from 7-13 February 2018 at the Kuala Lumpur Convention Centre – the only way to secure a safer city in Reading's New Local Plan.</p>	<p>No change proposed.</p> <p>We are not aware of a legal requirement for a 'Model Risk-Impact Evaluation Plan', nor are we sure what that would entail. The Local Plan has complied with its actual legal requirements.</p> <p>Ultimately, the Local Plan needs to work within the framework of existing national legislation and policy to set expectations for Reading. The Local Plan seeks to mitigate and adapt to climate change within the context of those expectations. However, these must be balanced against the</p>

		<p>To save lives and reduce impact, we have no choice but to reject RBC's draft Local Plan. The plan is not adequate or thorough enough to meet immediate and near future requirement for urban development planning. There is no risk evaluation. There is no consideration of the design-life of the new housing stock with regards to our changing climate.</p> <p>The Paris Agreement allows countries to implement ambitious mitigation targets beyond their government's Nationally Determined Contributions (NDCs) targets. However, it has been said "England's planning system is not effectively engaging with current risks and is simply disengaged from its core task of addressing long-term future change. The system remains critically unprepared to deliver both carbon dioxide emissions reduction and the urban resilience measures needed to deal with the scale of the climate change impacts anticipated in the UK. 70% of carbon emissions come from cities. This requires adequate and open urban governance." RBC needs to fast track actions now towards a 100% sustainable Reading. The plotting system of land and planning applications must have mitigation, adaptation and ecological consents. All new-build developments should be passive housing in the same area, min. LEED Gold Standard. Complete decarbonisation of the local economy 2026-2050, which is necessary to avoid the gravest climate risks, can only be achieved by profoundly transforming energy systems and other high-emissions infrastructure. (see New Urban Agenda).</p> <p>Open governments should ensure all regulations (e.g. building codes, public health regulations) are climate-proofed. The Local Plan must do this. The SEPT of RBC is trying to fast track the New Local Plan by referring to the Sustainability Appraisal of the Pre-Submission Draft Local Plan dated 2014 and the Reading Climate Change Strategy – the targets are very vague!</p>	<p>presumption in favour of sustainable development in the NPPF and the expectation that development needs are met insofar as it possible. In terms of climate change, the plan includes the following:</p> <ul style="list-style-type: none"> • Sets strong expectations for non-residential development in CC2; • Expects zero-carbon homes from major residential developments in H5; • Includes a policy requiring adaptation to climate change (CC3); • Including an expectation of the provision of decentralised energy in CC4; • Ensures water efficiency in new development in policy H5; • Includes a significant range of transport measures to provide for sustainable travel in TR1, TR2 and TR3; • Provides for increased infrastructure for electric vehicle charging in TR5; and • Sets a pattern of development in the Spatial Strategy and policy CC6 which in itself promotes travel by more sustainable modes. <p>In terms of the Sustainability Appraisal, the 20 objectives have been set with regard to the legislation and the context of Reading, and the justification is set out in the Sustainability Appraisal Scoping Paper.</p>
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		<p>with the national plan for the environment, <i>A Green Future: Our 25 Year Plan to improve the Environment</i>. We recommend the following questions be added:</p> <ul style="list-style-type: none"> • Are there concerns that the policy is legally compliant with “Our 25 year Plan to Improve the Environment?” • What climate change local-government adaptation outcome/concerns are wanted from this function/policy? • What risk/impact outcome/concerns are wanted from this function/policy? • How does this urban extension affect or constitute site destruction on this land in relation to this function/policy? • Are there concerns that the function/policy has a differential impact due to restoring/improving the natural environment? • Are there concerns that the function/policy has a differential impact due to people’s livelihood? • Are there concerns that the function/policy has differential impact due to inequality? <p>Ecopreneurs for the Climate in Reading wishes to deliver the following key messages: There is pressing need to accelerate and strengthen technological innovation, but no one-size-fits-all approach. We recommend that the SEPT encourage Parties:</p> <ul style="list-style-type: none"> • To prioritise resources for innovation; • To enhance public and private partnership in the research and development of climate technologies by increasing expenditure; • To strengthen systems through market creation, expansion and capacity building; • To enhance existing and build new collaborative initiatives; • To create an inclusive innovation process; and • To acknowledge and protect indigenous and local knowledge. 	
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		<p><u>Planning rules</u></p> <p>In risk-impact assessing and modelling their new Local Plan, RBC should ask:</p> <ul style="list-style-type: none"> • Has a legal framework for effective land use planning been put in place? • Has a strong partnership among community orgs been established? • Land use planning requires a multi-stake holder participation and can be done through involving relevant depts., technical experts, communities and stakeholder committee. <p>Reading Local Plan should include open mapping of physical environment, planning units, agro-climate, soil data, population, settlement, infrastructure, tenure, present land use, land-use types, land requirements, land suitability and economic projections.</p> <p>For years, RBC has failed to address development risk and sound assessment to the impact of climate hazards. We recommend the 20 Sustainability Objectives should be aligned with the 17 Sustainable Development Goals Agenda (2015-2030).</p> <p>There should be a consultation on risk-impact with Climate Change Centre Reading. There is a dilemma about housing in Berkshire. We need resilient housing. This area is in danger of saturation and we do not have enough land to fulfil the national housing requirement. It doesn't mean we are against housing, but it can no longer be built at the nationally imposed and standard rate without serious damage to character. We fully support the Campaign to Protect Rural England. We are concerned that soon RBC could be affected by the following EU environmental principles, which include:</p> <ul style="list-style-type: none"> • The precautionary principle; • The principle that preventative action should be taken to avert environmental damage; 	
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		<ul style="list-style-type: none"> • The principle that environmental damage should as a priority be rectified at source; • The polluter pays principle; • The principle that environmental protection requirements must be integrated into the definition and implementation of policies and activities, with a view to promoting sustainable development. <p>We support measures to include green and blue infrastructure. We wish to see wording in the new Local Plan of RBC to act as the body to hold all local stakeholders to account and give the environment a voice.</p>	
Cook, T.J.	General comments	I would like to ask why there are not significant sections on the following areas: Youth development for different ages; sports, health and recreation, elderly development in the area that considers people over the age of 65; Reading's parks, rivers and green areas including wildlife; business co-operation/sponsorship with local council to reduce costs; energy production in the area to create self-sufficiency working with local power suppliers; and Reading/Berkshire Development Bank for small and medium enterprises. At the moment, too much emphasis is on planning road development, but this doesn't take into consideration "how people live" as an important aspect of health of the community. I feel if we are planning for a significant period into the future that these areas need their own sections and shouldn't be wrapped into one small section of recreation in the plan.	No change proposed. It is considered that, where these issues relate to the spatial development of Reading, they are covered within the plan (see for example CC4, EN7, EN8, EN11, EN12, H6). They do not necessarily need dedicated headings or policies to have been covered. Other elements are not planning matters for the Local Plan to cover.
Greater London Authority	General comments	The Borough sits within the 'Western Wedge' Coordination Corridor extending from west London into the Thames Valley. Policy 2.3 of the London Plan sets out how these corridors can support strategic co-ordination of planning and investment. In the context of Reading's role as a significant economic and business centre, it may be useful to explore relevant economic linkages with London.	Noted. No change needed. The Council is open to continued discussion on these matters.
Molner, Maria Teresa	General Comments	We do not consider the plan to be sound because it does not consider the small business part of the grand plan. Multi-national companies are much more prolific in the future in your plan (4.3.2). Central Reading is only reserved for large corporate businesses which can afford high	No change proposed. The importance of small businesses is very much recognised, and is reflected in the plan approach. Paragraph 4.3.2 is merely a description of the current situation in

		business rates and big rents. Pushing small businesses to the South and West is not the answer. Modifications should be made to accommodate individuals with their businesses and local enterprises which are already established in Reading centre. The Council have the moral obligation to consider the issues of the small business of Reading and help its own population first. The local JobCentre is working with lots of people to help them have a better existence from the town where most of them live. I would like to appear in person at the examination to find a mutual solution to the problem of small businesses in the Town Centre.	Reading. Policy EM4 seeks to protect small business space, and increase it where possible. In terms of the town centre where small business space is within offices, the fact is that national approach has undermined this aim, and has led to a very significant amount of office space, much of it at cheaper rents and in-use, being converted to residential. The Council objected strongly to these changes, but they are now in place and the Council can only work within the existing framework.
Rowe, Dr Simon	General comments	This is an impressive and well-thought-out document which covers a large number of concerns already (far more than I had) and is easy to read online, apart from the large number of landscape tables at the end of the document.	Noted. No change needed.
Smeeth, Mrs E R	General comments	The new Borough Local Plan is a very long and involved document but the items that stand out most is the large amount of extra housing required within the tight boundaries of the Borough. In order to maximise the number of dwellings an increasing number of what were once single occupancy homes are being turned into Houses of Multiple Occupancy. Although this houses many more people a lot of them appear to be unsafe with the landlord not maintaining them properly and a return to pre-war standards of several families using the same toilet facilities. Perhaps in order to maintain some control any house that changes from single to multiple, i.e. more than one family to two or more tenancies, not the current 4 or 5 should be subject to planning and put on a register so that if problems arise the landlord can be traced. This ensures good safe homes for people. I believe that some councils have adopted this approach. Reading is already very densely populated and struggling to survive on Victorian main sewers and over patched water pipes. Every time another development takes place these overstretched amenities are further overloaded, hence frequent diffing up of roads to patch another pipe. It should be a condition of a planning	No change proposed. Changes of use from houses to houses in multiple occupation are already subject to planning permission if for more than 6 people and are dealt with in policy H8. The Council has also introduced an Article 4 direction to control changes of use to HMOs between 3 and 6 people in the area of greatest pressure, around the university. HMOs will also be subject to the licensing regime, which is not dealt with in the Local Plan. In terms of water supply, the Council has liaised with Thames Water in drawing up this plan, and identified where upgrades to infrastructure may be needed. It is already part of the development process for the needs for infrastructure,

	<p>decision that the contractor should talk with the highways department and the services involved to make arrangements with them to increase the capacity to cover a foreseen increased need before work starts on the building. The cost should be considered when the sum for section 106, paid by the developer, is calculated and part then paid to the service providers and overseen by the Council. In the past, the Council does not always use that money for the needed services. When Waitrose wanted to expand its Oxford Road store some years ago it seems the Council had so much money that I was told it was used to provide flower beds at the junction of Broomfield Rd and Norcot Rd (which the Council do not keep in order). What relationship this had with a larger store a mile away is beyond me. A discussion between the Council and the store over the effect on the locality from that extra lorry use would have been helpful and should have gone some way to rebuilding Scours Ln which is a disgrace. When the Potteries estate was built off Norcot Road, land was left for a community centre. This land was never used for the purpose and now has house built on it. This does show that planning is given on certain conditions which are then breached. The town does need more homes for workers, 2 and 3 bedroom homes and the Dee Rd redevelopment is a good example of what is needed including electricity generating equipment on the roofs which maybe has removed the need for a new electricity substation to be built. However can the schools provide education for an increased number of children? What about a health clinic? The same questions arise from any large development. I was sorry to read that only 2 allotment sites appear to be sacrosanct, Caversham Court and Emmer Green. With so many flats being built it is strange that the plan reads as if there is a presumption of retention of allotment sites only. It used to be a statutory requirement for local councils to provide sites if there was a need. This presumption is the get out clause since part of the Tilehurst Pools allotment site has been included in possible building sites. When there is need for house it seems all the word done to retain those allotments and trees and bushes on the top of the hill has been</p>	<p>including highway works, to be considered and resolved.</p> <p>The Council seeks to ensure that its Section 106 requirements are deliverable, and delivered at appropriate points during the development process. There have been issues in the past, but lessons have been learned in terms of how such agreements are drawn up.</p> <p>In terms of education, a particular need for a new secondary school has been identified, and the Council is actively pursuing options for its provision.</p> <p>In terms of allotments, whilst not all are identified in policy EN7, EN8 does provide a general presumption that allotments will be retained. Some allotments remain protected by separate statute. The in-use allotments on the Tilehurst site are identified as Local Green Space.</p> <p>Mapledurham Playing Fields is identified as Local Green Space in the Local Plan, and is not proposed for development in the document. There is an existing undetermined application for development of part of the area for a primary school. This will be determined on its merits, and is not part of the Local Plan. It is not appropriate to comment upon it here.</p> <p>Policy EN12 deals with biodiversity, and protects important sites and seeks the establishment of a</p>
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		<p>wasted. Mapledurham Playing Fields have been designated LGS. If it is a local green space does it really need a school built on it so reducing the size of said green space which was given to the town in perpetuity? Bugs Bottom was supposed to have the school when all the fuss about building in that area occurred some years ago. The said school was never built. Another planning decision breached. The Kennet and Thames are gradually losing their wild places in the town centre. What is supposed to happen to the wildlife that lives there? Their habitat throughout the Borough is being slowly eaten away. They need homes too. All can't live in the tamed copses and parks which are preserved in the plan. Those poor deer in the cemetery at Cemetery junction are stuck and will, one assumes, inbreed without access to new bloodlines. So it could be with other groups of wild animals without corridors of safe movement which are mentioned but will they occur? Borough residents too need the trees and bushes to clean the town's polluted air. The congested town needs lungs to clear the air. The river corridors have been providing some relief until now and should be seen as a wild asset not a place for another road. On a tangent not to do with the plan, does the Council have any thoughts on the number of smelly wood burners which are legal because they can burn dual fuel but which pollute the air when the wind is not blowing. Even the trees seem unable to deal with that awful smell.</p>	<p>green network to allow movement between sites.</p> <p>The smell of wood burners is not a matter for the Local Plan.</p>
Surrey County Council	General comments	We have no comments to make on this document.	Noted. No change needed.
Transport for London	General comments	<p>Thank you for consulting Transport for London (TfL). We provided comments on the previous draft in June 2017 (response enclosed). We are pleased to note that all our comments and suggestions in relation to Crossrail safeguarding have been taken into account and relevant amendments have been made to the pre submission draft. We welcome these changes. Since the previous round of consultation, the draft Mayor's Transport Strategy has been published and the new draft London Plan is now out for consultation. We would be grateful, if you would consider extending some of the Mayor's strategic transport policy</p>	<p>Noted. No change needed. Issues such as identified in the Mayor's transport policy objectives are also identified within the Council's own transport priorities and in the LTP, and are reflected in policies such as EN15, TR1 and TR3.</p>

		objectives to the borough including the promotion of Healthy Streets, rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger.	
Woodley Town Council	General comments	The Woodley Town Council Planning Committee has considered the Reading Borough Pre-Submission Draft Local Plan and had no comments to make on the proposals.	Noted. No change needed.
Wycombe District Council	General comments	Thank you for providing Wycombe District Council the opportunity to respond to the Reading Borough Local Plan Pre-Submission Draft Local Plan. It is noted that Reading Borough Council has unmet housing need which is to be met within the West Berkshire HMA, this has been confirmed by the Memorandum of Understanding signed by the six Berkshire unitary authorities in October 2017. Wycombe District Council have no other comments to raise. We welcome this Local Plan update and look forward to future cooperation on strategic matters.	Noted. No change needed,
Bracknell Forest Council	Site allocation policies	Bracknell Forest Council welcomes allocation Policies for major opportunity areas (CR11, CR12 and CR13) and Policies WR3 and ER1 which seek to meet this need in full.	Noted. No change needed.
Environment Agency	Site specific policies	Site allocations: For all riverside sites, reference should be made to policy EN11.	No change proposed. Site allocations will need to comply with a whole range of development management policies from the Plan, and there should not need to be an individual reference in each case.
Thames Water	Site specific comments	Site specific comments - The pre-submission draft has proposed some differences in dwellings numbers for the draft allocations, but not of any significance, as such our comments in relation to water supply and waste water network remain as previously submitted, and which are attached again for reference. In relation to sewage treatment capacity, the projected population growth within the area will increase demand for sewerage treatment, placing increased pressure on the treatment works. We are in the process of assessing available headroom and options to accommodate growth in the long term at Reading STW, as such early engagement and confirmation of delivery rates would be valuable to inform the assessment. With the above in mind Thames	Noted. No changes needed. Changes were made to the site-specific policies after the Draft Local Plan consultation to pick up on the points raised.

		Water supports the statement “give early consideration to the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required” which is included within a number of the site specific allocation policies.	
Historic England	Paragraph 1.2.5	Paragraph 1.2.5 – This is legally compliant, sound and fulfils the duty to co-operate. Historic England welcomes this paragraph as part of the positive strategy for the historic environment as required by paragraphs 126 and 157 of the NPPF.	Noted. No change needed.
Historic England	Section 1.5	<p>1.5 Evidence and technical reports – We do not find this section to be sound. Paragraphs 158 and 169 of the NPPF require local plans to be based on adequate, up-to-date and relevant evidence about the historic environment. We have previously noted that the Council’s previous evidence base webpage did not list any historic environment evidence. This remains the case with the Council’s Technical Studies and Background Documents webpage. We are aware of the Council’s series of Conservation Area Character Appraisals, the Culture and Heritage Strategy 2015-2030 and the Berkshire Historic Environment Record. Other sources of information on the historic environment include the National Heritage List for England, the Heritage at Risk Register and the East Berkshire Historic Landscape Characterisation. However, we are not clear if the Council has other historic environment evidence e.g. is there an extensive urban survey of Reading or other townscape or characterisation study? Is there an urban archaeological database? Is there a list of locally important heritage assets? Has the Council undertaken a survey of grade II buildings at risk? Historic England’s advice on the historic environment in local plans (Good Practice Advice Note: 1: “The Historic Environment in Local Plans”, available on the Historic England website: http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/) suggests that “It may be helpful to collate this information within a Heritage Topic Paper to draw together the evidence prepared and the subsequent implications and actions required.” We expect the Council to have an adequate, up-to-date and relevant historic</p>	The Council has prepared a Heritage Background Paper which sets out the evidence and how it has been used to derive the policy approaches of the plan. This is part of the Submission Documents List.

		environment evidence base and to demonstrate in the Local Plan how that historic evidence base has informed and influenced the Plan's policies and site allocations. As it stands, we cannot be confident that this is the case. The Council should set out those studies, reports and other sources of information it has used as the historic environment evidence base to underpin the policies and proposals of the local plan. If that evidence base is not adequate, up-to-date and relevant then the Council should undertake further evidence-gathering to ensure that the policies and proposals of the local plan provide proper protection for the historic environment in accordance with the National Planning Policy Framework.	
Cowling, Tony	Paragraph 2.1.3	2.1.3—I would much rather we talked about low energy than low carbon. I can explain why and the difference between the two.	No change proposed. This is simply a reference to the wording of the Reading 2050 Vision.
Environment Agency	Vision	Vision: We would like to see more emphasis put on the fact that much of Reading's heritage and landscape is tied to the rivers and their valleys and floodplains.	No change proposed. The importance of both the watercourses and heritage are already stressed in the vision.
Historic England	Vision	Vision - Historic England welcomes and supports the inclusion of <i>"Reading's extensive heritage importance will be conserved and enhanced and better revealed and integrated into the identity of the town"</i> in the Vision as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Theatres Trust	Vision	Vision: The Trust welcomes the promotion of Reading as a "place for culture, leisure and entertainment", and the Plan's recognition of Reading's expanding role as a centre for arts and culture.	Noted. No change needed.
Historic England	Section 2.2	2.2 Objectives - Historic England welcomes and supports Objective 6 <i>"Maintain and enhance the historic, built and natural environment of the Borough through investment and high quality design....."</i> as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.

University of Reading	Objectives	<p>The University supports a number of objectives for the draft Local Plan, in particular:</p> <ul style="list-style-type: none"> • For Reading to be an accessible focus for the development of employment, housing, services and facilities, including meeting the needs of residents and those who study in Reading Borough; • Make the most efficient use of Reading’s limited land, to ensure that as many new homes as possible are delivered to meet identified needs; • Improve the quality of life for those living, working, studying in and visiting the Borough, with good access to education (amongst other services and facilities); • To ensure new development and existing areas are accessible and sustainable, including reducing its effects on, and adapting to, climate change. 	Noted. No change needed.
Thames Properties Limited	Objective 2	<p>Objective 2 – This objective aims to make effective and efficient use of existing land, particularly previously developed land. The Draft LP sets out that provision will be made for an additional 15,433 dwellings. The SHMA identifies an OAN of 699 dpa from 2013 to 2036. Policy H1 acknowledges a housing shortfall of 644 dwellings to be accommodated by neighbouring authorities within the Western Berkshire HMA. There is no guarantee of the unmet need being met within the HMA and no commitment in the Local Plan for neighbouring Authorities to accommodate this need. Policy H1 simply states that “The Council will continue to work with neighbouring authorities...to ensure that the shortfall will be met over the plan period.” The need to make efficient use of available, previously developed land is clearly of great importance. We are therefore supportive of this objective but suggest that RBC should seek to make more effective use of brownfield sites to contribute towards meeting its housing need rather than rely on the ability of neighbouring authorities to accommodate its unmet need.</p>	No change proposed. The Council has sought to make effective use of its brownfield sites to accommodate its range of development needs (which includes employment as well as housing), and this is illustrated in the Housing and Economic Land Availability Assessment.
Viridis Real Estate Services Ltd	Objective 2	<p>Vision and Objectives, Objective 2 - Viridis welcome the changes made to Objective 2 and the reference to brownfield land. However, the Council has not addressed in full the comments raised in our FDLP</p>	No change proposed. It remains our view that the reference to ‘optimising’ use of land in the NPPF is balanced against other considerations

	<p>response (page 2) in relation to housing delivery. We would reiterate our comments that the Council’s objective should be to optimise the development potential of brownfield sites in accordance with paragraphs 17 and 58 of the National Planning Policy Framework (NPPF). The Council’s published ‘Statement of Consultation on the First Draft Local Plan’ (SoC) acknowledges that the NPPF refers to the need to ‘optimise’ the potential of sites, but adds that paragraph 58 of the NPPF is caveated by also referring to optimising the ability of sites to accommodate a range of uses including housing, as well as green/public space. This is not an accurate interpretation of paragraph 58. We recognise the Council’s caution, in that they do not wish to encourage overly dense development. However, the NPPF has been careful to adopt the term ‘optimise’ rather than ‘maximise’ and in so doing there is an inference at paragraph 58 that development should have regard to all constraints in making an efficient use of land. In addition, the relevant bullet point under paragraph 58 does not say that other uses and public space should be optimised, here the Council has misunderstood the text, which actually lists three sub-requirements for development. When read correctly, paragraph 58 clearly requires development to optimise the potential of sites. Doing so does not override or undermine other requirements, such as public open space or other land uses. We would add that if the Council takes the opportunity to optimise the development potential on sites, it will be well placed through Policy H3 to deliver affordable housing. Given the provision of affordable homes is a specific policy requirement, Viridis do not consider it necessary to include this in Objective 2. In this context Objective 2 does not meet the following tests of soundness:</p> <ul style="list-style-type: none"> • positively prepared; and • consistent with national policy. <p>We would therefore request the following changes to Objective 2: <i>“Make the most efficient use of Reading’s limited land, particularly <u>by optimising the development potential of previously developed land, to ensure that as many new homes as possible are delivered to meet</u></i></p>	<p>within the bullet point, whether or not ‘optimisation’ also refers to open space, and it should therefore be viewed in this context. In our view, this is in any case, a distinction without a significant difference. The Council has tried to use plain English wherever possible, and ‘most efficient’ is in our view a better wording in this context than ‘optimise’.</p>
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		<i>identified needs, particularly needs for affordable housing."</i>	
Thames Properties Limited	Objective 3	Objective 3 – We are supportive of the need to create sustainable communities with good access to employment and open space. The proposed allocation of a sustainably located, previously developed sites for residential use in the Local Plan such as site reference WR3a (former Cox and Wyman site) fully supports the aims of this objective. The proposed allocation of sites WR3a, WR3b and WR3c for residential development is a clear indication that there are sustainably located, previously developed sites in the Borough that could be put to better use to meet objectives 2 and 3. In particular, this demonstrates that the Council recognises that parts of the Richfield Avenue CEA are better suited to residential development than employment use, and the employment designation is perhaps outdated.	No change proposed. There are employment sites in the Borough that are considered could be put to better use, and these are brought forward as development allocations. It is not an indicator that there are further sites that are best used for this purpose. There are also considerable needs for employment development, and allocating large swathes of employment land for housing will only mean that Reading fails to meet its employment needs instead.
Englefield Estate	Section 3: Spatial Strategy	The estate is located to the south of Reading, within Wokingham Borough and West Berkshire Districts, but adjoining the edge of Reading Borough. Part of the Estate's landholdings lie within an area at Grazeley which has been identified in the Pre-Submission Draft Plan as having potential for strategic development to help meet the needs of the wider housing market area. RBC contends that it is unable to meet its OAN (699) in full – the level of housing proposed within the Pre-Submission Draft Plan is only 671 dpa, leaving a shortfall of 644 dwellings over the plan period. The Council proposes to work with neighbouring Authorities in the Western Housing Market Area (HMA) to provide for this need. The approach is welcomed and helps to meet the Council's requirements under the Duty to Co-operate. The West of Berkshire Spatial Planning Framework recognises that a significant proportion of new development will need to be located on greenfield land and will include sites brought forward collaboratively to deliver the scale of growth required. Land at Grazeley is identified as an 'opportunity area' for a major housing and mixed use development. This is the most appropriate response to Reading's inability to meet its needs. The estate therefore wishes to express support for the references made within the Draft Plan for development at Grazeley, for example at Policy SR4f,	Noted. No change needed.

		<p>paragraphs 6.1.6, 6.2.1d, 6.2.10 and 6.3.17. Further, we welcome the references to Grazeley that are made in the ‘Spatial Strategy’ section. It will be important to plan flexibly for growth at Grazeley, because the Berkshire SHMA recognised that (a) the housing needs of the Eastern HMA to meet its own needs may be more limited and so the authorities in the Western HMA may need to accommodate “overspill” from the Eastern HMA. It will therefore be necessary to plan flexibly for growth at Grazeley and to ‘future proof’ infrastructure and services so that the scale of growth accommodates the required housing needs. In planning across boundaries for strategic growth to meet the needs of the HMA, the Council is working effectively and planning positively for growth, as required by the ‘test of soundness’ set out at paragraph 182 of the NPPF. As noted previously, it is also aiming to fulfil its requirements under the Duty to Co-operate. Growth at Grazeley represents an appropriate strategy to deliver the housing needs of the area, and would further the aim of delivering sustainable development as required by national policy (and, again, would be consistent with the tests of soundness set out in paragraph 182 of the NPPF).</p>	
Slough Borough Council	Section 3: Spatial Strategy	Spatial Strategy - Slough supports the principles of the spatial strategy summarized in 3.2.1 as the most sustainable approach to meeting development needs.	Noted. No change needed.
Tarmac	Section 3: Spatial Strategy	<p>Tarmac Land Ownership: Tarmac own land in the South Reading area - the landholdings are marked on the attached plan. Some of the company’s ownership also lies within the administrative area of the adjoining West Berkshire District.</p> <p>Proposed Designations: None of the Tarmac land is currently proposed for built development in the emerging Local Plans of Reading or West Berkshire. The Proposals Map shows the landholdings in Reading to be the subject of several environmental designations including Area of Archaeological Potential, Area of Identified Biodiversity Interest and a Major Landscape Feature. The Area Strategy for South Reading shows the sites as green</p>	<p>No change proposed.</p> <p>The areas shown for potential growth within West Berkshire and Wokingham are possibilities, and are not within the respective authorities’ Local Plans at this stage. Even if identified, their scale, nature and exact location are yet to be determined. There is not therefore any guarantee that, even if development of some form goes ahead, infrastructure provision such as flood alleviation will need to be made on the specific land identified. It would therefore be</p>

		<p>space.</p> <p>Major Growth Proposals: However, the growth proposed in South Reading, together with adjacent areas of West Berkshire and Wokingham District is of a very significant scale. The non-statutory West of Berkshire Spatial Planning Framework provides the best current indication of the scale and location of this potential growth on the boundaries of Reading. Major development is suggested at both Grazeley/Mortimer with 10000 units in Wokingham and a further 5000 in West Berkshire. In South Reading, within the Borough boundary, major new employment development is planned at the Island Road Major Opportunity Area together with other major redevelopment opportunities at Manor Farm Road and South of Elgar Road.</p> <p>Strategic Infrastructure Requirements: This scale of potential growth will require supporting green infrastructure and surface water drainage infrastructure that is off-site and may impact/require the land in Tarmac ownership and other similar sites. The requirement for sites to perform these functions to facilitate and release major development is not in any way recognised or addressed. There should be a specific and clear reference to the infrastructure that may be needed in those areas which now have only environmental designations. In the future new flood alleviation methodologies may be devised that will render the sites suitable for built development. Tarmac wish to confirm that their landholdings are available for development in that context.</p>	<p>premature to identify land for such uses. In the case of Grazeley, this would be some distance from the Tarmac land and is likely to provide its own open space and flood alleviation measures within the area. The area to the south west of Reading has more connection to the Tarmac land, but is at a much earlier stage and there is very little prospect of any development within the next few years. As (and if) a scheme is drawn up, a review of the Local Plan will be able to take account of any implications for Reading.</p> <p>It is not considered that the allocated sites within Reading Borough require any particular infrastructure provision in terms of open space or flood alleviation on the land owned by Tarmac</p>
Thames Properties Limited	Section 3: Spatial Strategy	<p>Spatial Strategy – The Plan sets out the strategy for existing employment areas and recognises that a high level of need has been identified for new floorspace for employment development. The plan does, however, recognise the tension between maximising the efficiency of existing employment areas to fulfil this role and identify existing employment areas that are failing to meet the demand. Thames Properties agree that a balance must be struck between retention of existing, suitable employment land for that use to meet demand for employment space,</p>	<p>Noted. No change needed.</p>

		and the redevelopment of employment land that may no longer be suitable for purpose and could be used more efficiently to help meet the Borough's demand for housing. Thames Properties welcomes the flexibility expressed in paragraph 3.2.10 for the release of some employment land for residential use and the identification of the eastern edge of the Richfield Avenue CEA as a suitable location for housing. This is reflected in WR3a.	
University of Reading	Section 3: Spatial Strategy	The spatial strategy for Reading within the Draft Plan at paragraph 3.2.1 further recognises the constrained nature of the Borough, which dictates spatial strategy to an extent. The University considers that this should mean that the Council makes the most efficient use of sites able to accommodate residential development, such as the Boat Club site and Redlands Road, allowing flexibility within the policy wording for higher residential numbers where appropriate (i.e. flood mitigation for the Boat Club site). Both sites at the Boat Club and Redlands Road fulfil the aims of paragraph 3.2.11 because they are highly accessible. The University therefore support the Vision, Objectives and Spatial Strategy set out in the Draft Plan, and would point to the opportunity to efficiently develop both Redlands Road and the Boat Club site in order to contribute further towards the housing shortfall over the Plan period. It is considered that a third Thames Bridge is critical to the future of Reading and must be considered as a fundamental requirement in terms of strategic infrastructure. As stated within our previous representations, the University maintains its support for the Draft Plan to provide an additional crossing.	No change proposed. The support for the strategy is noted. Representations on the Boat Club and Redlands Road are dealt with elsewhere.
Viridis Real Estate Services Ltd	Section 3: Spatial Strategy	Spatial Strategy for Reading - The Council's spatial strategy states that 7,600 homes will be delivered in Central Reading over the Plan period (2013-2036). This is a reduction from the 7,700 homes stated in the FDLP. The reasoned justification for Policy H1 explains the figure, which is almost 50% of the overall housing target, is the result of the tightly constrained nature of Reading which limits the development opportunities in the central area. Although we welcome the approach to focus housing in the Central Reading, for the reasons set out later in this	No change proposed. It is not agreed that the spatial strategy underestimates the potential for residential development in the central area. This is based on the assessment within the Housing and Economic Land Availability Assessment. The fact that there is a reduction in the stated housing level in the central area is primarily due to the representations on one part of Forbury

		<p>letter we are of the opinion that the spatial strategy is contrary to paragraphs 47 and 58 of the NPPF in failing to significantly boost the supply of homes in the most sustainable area of Reading by optimising the development potential of sites.</p> <p>On this basis the spatial strategy does not meet the following tests of soundness:</p> <ul style="list-style-type: none"> • justified; • positively prepared; and • consistent with national policy. <p>The spatial strategy should be amended to reflect the requirement of the NPPF to promote sustainable patterns of development by optimising the development opportunities in Central Reading to enable a greater number of homes to be delivered in the central area.</p>	<p>Retail Park that the site is unlikely to be available in the plan period. The site remains as an allocated residential site, but the spatial strategy cannot therefore assume its delivery. This has been counterbalanced by increased potential on other sites. It is not agreed that a spatial strategy that results in growth of this scale in the town centre is restrictive.</p> <p>Matters related to the potential capacity of Viridis's site are dealt with under CR13c.</p>
West Berkshire District Council	Section 3: Spatial Strategy	<p>We note that Figure 3.2 (Spatial Strategy for Reading), Figure 6.1 (Area Strategy for South Reading), and Figure 7.1 (Area Strategy for West Reading and Tilehurst) all depict a potential future development area that covers an area from the west of Three Mile Cross to south of Theale and Calcot. We would highlight that this is the 'area of search' as shown in the West of Berkshire Spatial Planning Framework. In relation to this and Reading's unmet housing need, we would re-iterate the comments that we made to the draft Reading Local Plan (dated 13 June 2017).</p> <p>The West of Berkshire Spatial Planning Framework identifies that there is a possible large development opportunity in the Grazeley area (south of the M4); an area that straddles both West Berkshire and Wokingham districts. If development were to come forward in the long term, then there is the potential for some or all of Reading's unmet housing needs to be accommodated in this area. Nonetheless, such a proposal is not currently included within either West Berkshire's or Wokingham's development plans and further work is still required to assess the potential of this development opportunity. Work on a comprehensive West Berkshire Local Plan review is underway which will amongst other</p>	<p>Noted. No change needed. It is understood that the locations shown on these figures is subject to further consideration, and the Local Plan ensures that it is clear that they have not been included within the development plans of either West Berkshire or Wokingham at this stage. However, RBC needs to understand the potential implications of any proposals in terms of transport links and other infrastructure, and it is important context to our Spatial Strategy.</p> <p>The four Western Berkshire HMA authorities continue to work together to understand how development needs across the area can best be addressed.</p>

		things refine the housing target to 2036 and include allocations housing and employment. We anticipate the adoption of this document towards the end of 2020. No decisions have been made yet as to the location of any future development. Given that West Berkshire district has considerable constraints to development; any new housing target identified will be arrived at following additional work which will consider the constraints to, and opportunities for, development, and will be informed by the collaborative work with the other authorities within the Western Berkshire HMA.	
Cowling, Tony	Paragraph 3.1.5	3.1.5—I strongly object to the colours on the map. It is a bit cheeky using green for proposed development areas and it is unusual, too. Some of the areas identified for future development are crazily in flood alert areas! That goes against the policy.	No change proposed. Possible development areas are shown in blue. Existing areas are in green. This is an excerpt from an existing document and is not a matter for the Local Plan.
Environment Agency	Paragraph 3.2.3	Spatial Strategy: 3.2.3 appears to only consider a two dimensional view of Reading Borough and does not consider underlying geology and the sensitivity of aquifers in particular the Chalk that in the southern part of the Borough is confined by the London Clay and Lambeth Group. Tall buildings in Central reading will require the use of piling and may connect surface contamination to this aquifer. Therefore we strongly recommend a caveat is added saying that the contaminative status of the land has to be considered where piling is used. Providing a definition of ‘appropriate’ would be useful and should say something like “that in some instances, due to contamination, piling may not be suitable unless remediation is carried out to a suitable standard to protect the Principle Aquifer.”	Partly agreed. Change proposed. Whilst it is agreed that this is a point that needs to be made, piling may not be restricted to tall buildings. It is therefore considered that this may need to be considered more widely, and is most appropriately located in the supporting text to EN16.
Environment Agency	Paragraph 3.2.5	3.2.5 – Reference is made to the risk of flooding and rivers being physical barriers to movement. This focuses only on the constraints that rivers impose. More emphasis should be put on the opportunities that rivers provide, i.e. they should be seen as assets and not constraints.	Noted. No change proposed. It is agreed that the rivers are not simply a constraint, and this also applies to the other matters listed in this paragraph, e.g. heritage and the railway. However, the references make sense within the existing context.
Historic England	Paragraph 3.2.5	Paragraph 3.25 - Historic England welcomes the reference in paragraph 3.2.5 to the heritage interest in the central area and the recognition that	Noted. No change proposed. It is agreed that the historic environment is not simply a

		<p>the density and design of development will need to reflect this, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework. However, we would comment that heritage assets should not always be seen just as a constraint. Historic buildings may offer opportunities for business or employment use – infrastructure to support economic development. Investment in heritage assets (e.g. listed buildings at risk) and the wider historic character of a place (e.g. conservation areas at risk) may also serve to stimulate and support the tourism offer and attractiveness of a place to retain and attract economic development, which may be particularly important in supporting the viability of town centres. (Conversely, vacant or underused heritage assets not only fail to make a full contribution to the economy of the area but they also give rise to negative perceptions about an area and discourage inward investment).</p>	<p>constraint, and this also applies to the other matters listed in this paragraph, e.g. the rivers and railway. However, the references make sense within the existing context.</p>
Historic England	Paragraph 3.2.11	<p>Paragraph 3.2.11 - Historic England welcomes the recognition of the need to have regard to “the existing character of a local area and issues such as heritage” when considering increased density as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework. However, increased density will not always automatically be to the detriment of heritage so it will not always need to be a “balance”. Indeed, a “win win” situation should be the aim, not a “balance”, which implies a less than optimum compromise for both sides of the balance, and would be a more positive approach in line with paragraph 126 of the Framework. Historic England is currently undertaking research into increasing density in historic areas. Although we do not consider it a matter of soundness in its own right, we do suggest that the second sentence of paragraph 3.2 11 be reworded as “However, careful attention should be paid to the existing character of a local area and issues such as heritage”.</p>	<p>Agree. Change proposed. The wording should be altered as suggested.</p>

Aviva Life and Pensions UK Ltd	Policy CC1	CC1 – Aviva welcomes the recognition of the role of the NPPF and other national guidance and that there will be a positive approach to considering development proposals.	Noted. No change needed.
University of Reading	Policy CC1	The University would like to express its support for Policy CC1 (Presumption in favour of sustainable development). This policy closely reflects national policy by reflecting positive language to the consideration of development proposals, and taking from the relevant introductory paragraphs from the NPPF which consider the presumption in favour of sustainable development, namely, paragraphs 11 through to 16.	Noted. No change needed.
Aviva Life and Pensions UK Ltd	Policy CC2	CC2 – This policy should explain in greater detail that there may be a need to take a flexible approach and ensure that this policy does not preclude high quality development being brought forward. The policy should be amended to allow applicants to demonstrate being brought forward. The policy should be amended to allow applicants to demonstrate that the standard they propose to achieve is the highest possible for the development as this will reflect the complicated natural and conflicting demands some sites face when being redeveloped.	Noted. No change needed. Policy states that highest possible standard is required "where possible." This allows sufficient flexibility.
Cowling, Tony	Policy CC2	Section 4—Why are we using the BREEAM standard instead of a robust low energy standard like, for example, Passive Haus? Other authorities are adopting the Passive House standard as are the best social housing providers. I am very happy to hear that Reading is intending to require a better standard of insulation than the minimum required by current building regulations.	Noted. No change needed. It is considered that Passiv Haus, although encouraged in Reading, would increase build costs beyond the BREEAM standards and may affect viability. We are aware of other authorities adopting the Passiv Haus standard for social housing provided by Councils themselves, but this is not a requirement we could impose on developers.
Hermes Property Unit Trust	Policy CC2	Policy CC2 – Whilst it is appreciate that the location of many sites are within highly sustainable areas, it is considered that further clarification is required beyond paragraph 4.1.1 as to what uses would be expect to meet. Alternatively, it should be clarified within the re-worded within the policy from 'where possible' to 'to be assessed on a case by case basis.' As such, the policy requires further clarification to ensure that it is effective in line with paragraph 182 of the Framework.	Noted. No change needed. "Where possible" provides sufficiently flexibility. Additionally, the policy is clear as to what uses should achieve specific BREEAM standards. CC2 details requirements for non-residential development, while H5 covers residential development.

K2 Developments	Policy CC2	CC2: Sustainable Design and Construction – We consider that further clarification is required within the policy to ensure recognition from the Council that BREEAM Excellent will not be achievable in all instances and will need to be considered on a site by site basis.	Do not agree. No change needed. This policy specifies "where possible." Thus, it recognises that BREEAM excellent will not be achievable in all instances.
Reading Climate Change Partnership (RCCP)	Policy CC2	CC2 – We believe this policy does not go far enough in driving the required reductions in carbon emissions, included embedded carbon, and therefore is in conflict with Section 10 of the NPPF which states planning should “secure radical reductions in greenhouse gas emissions.” Further, we believe the proprietary BREEAM standard to be an insufficient driver alone for achieving significant carbon reductions, and the policy should be strengthened to ensure high levels of carbon reduction are mandated. In 4.1.2 we welcome recognition of the Reading Climate Change Strategy, but as this only currently runs until 2020, feel recognition is required that deeper cuts beyond the referenced 34% will be required over the planning period to 2036, in line with the UK Climate Change Committee’s Carbon Budgets.	Do not agree. It is considered that the highest BREEAM levels have been required as to not affect viability.
Reading Friends of the Earth	Policy CC2	<p>Soundness: This is not sound because it does not require new non-residential buildings to reduce their energy consumption and CO2 emissions to a sufficiently ‘radical’ extent and it fails to account of ‘embodied carbon’.</p> <ul style="list-style-type: none"> • Section 10 of the NPPF says planning should “secure radical reductions in greenhouse gas emissions”. • Objective 5 of the Plan is “Ensure new development and existing areas are accessible and sustainable, in accordance with the sustainability appraisal objectives, including reducing its effects on, and adapting to, climate change” <p>BREEAM standards do not adequately address carbon emissions. BREEAM ‘Very Good’ and ‘Excellent’ standards require respectively no credits and 6 credits for CO2 reduction as a minimum standard. These credits are then expressed as % of 30 credits which is the maximum number of credits for CO2 reduction. So buildings meeting BREEAM ‘VG’ and ‘Excellent’ standards could score respectively 0% and 20% for CO2 reduction. These percentages are then weighted by the</p>	Do not agree. It is considered that the highest BREEAM levels have been required as to not affect viability.

		<p>19% which is the weighting for CO2 reduction under BREEAM assessment. So BREEAM 'VG' and 'Excellent' standards could be achieved with CO2 reduction contributing respectively 0% and 3.8% to the total BREEAM score. BREEAM 'VG' and 'Excellent' standards require total scores respectively of 50% and 70%. Retro-fitting energy saving technology in the future is likely to be much less cost-effective than achieving a high standard for the initial build. Modification: The developments covered by this policy should be required to achieve high levels of energy efficiency and carbon reduction. In addition to their proposed BREEAM standard this policy should require:</p> <ul style="list-style-type: none"> • Fabric energy efficiency to meet a high standard— perhaps under the BREEAM scoring system so that no additional assessment will be required. • Future-proofing of the heat supply system to allow for low-temperature heat supply from district heating or heat pumps (i.e. suitably sized underfloor or 'blown air' heat exchangers) even if initially gas or direct electric heating is to be used. • Lifetime carbon emissions – including both embodied and use-phase carbon - should be assessed using the RICS Whole-Life Carbon Professional Statement method to ensure that the best design choices are being made to minimise climate impacts. • Post-occupancy Evaluation to confirm that performance is being achieved and to provide evidence that the 'performance in use gap' has been closed. 	
Cowling, Tony	Paragraph 4.1.2	<p>4.1.2—Is 34% a sufficiently good target to set? We will need to be doing an awful lot better than this in order to meet future targets. It becomes increasingly difficult to make further savings, i.e. initial savings are much easier to make than later ones, and therefore we should aim higher earlier. It actually makes economic sense (Exeter City Council has already shown that it is cheap to build social housing to the Passive House standard. I am in favour of a robust low-energy standard for all new construction and a less exacting one for refurbishment.</p>	No change proposed. This merely references the target from the Climate Change Strategy.

Reading Friends of the Earth	Paragraph 4.1.2	<p>Soundness: This is a Plan to 2036 so there should be commitment to carbon reduction beyond the 2020 horizon of Reading's Climate Change Strategy. Modification: Reference should be made to:</p> <ul style="list-style-type: none"> • The Climate Change Act ... and ... • The Climate Change Committee's Carbon Budgets – e.g. 5th Budget 57% reduction by 2030 ... and ... • There should be commitment that Reading's emissions reduction targets will exceed future Carbon Budgets and Building Regulations. 	No change proposed. Many policies regarding the natural environment, energy, sustainable design and construction and flooding, as well as specific site allocations address the specific requirements of the National Planning Policy Framework that are intended to meet the aims of the Climate Change Act. Addressing climate change is one of the core land use planning principles required by the NPPF. We cannot reference targets that have yet to be set and approved by the Council. We reference the target from the most recent Climate Change Strategy.
Bedford, Chris	Paragraph 4.1.9	In 4.19, line 6, after 'run-off,' add 'and directly from watercourses.' Delete 'and' and change 'while' to 'While.' Surface water flooding arises when run-off rate exceeds drainage capacity, and often occurs well away from watercourses. River ('fluvial') flooding arises from rising river levels. The existing wording 'As such...' confusingly reads as implying a direct link with the watercourses listed just before. The end of the para does make the distinction, so the proposed change would make the para internally consistent.	Agreed. Change proposed.
Cowling, Tony	Policy CC3	CC3—Bullet point one is nonsense and self-contradictory. Please re-visit this. For instance, should all buildings have large south facing roofs?	Do not agree. This bullet points are applied on a case-by-case basis and do not amount to a specific requirement for large south facing roofs.
Environment Agency	Policy CC3	CC3: With regard to the third bullet point, please can you add that any planting plans along river corridors or in any other semi-natural habitat, should only use native plants of UK provenance?	Agreed. Change proposed to specific native plants.
Reading Climate Change Partnership (RCCP)	Policy CC3	CC3 – We welcome recognition of the importance to climate change adaptation (with specific comments regarding flood risk covered below).	Noted. No change needed.
Robson, Elaine	Policy CC3	The selection of trees and plants is related to changing climatic conditions and to Reading's future development.	Noted. No change needed.

University of Reading	Policy CC3	Policy CC3: The University are supportive of principle behind this policy, however, in order that the Policy can be considered fully justified and therefore sound, changes are required. This Policy is currently unsound. The issue with draft Policy CC3 is that it is written very definitively without accounting for what would be reasonable, proportionate and appropriate with reference to the NPPF at paragraph 182. Not all measures listed within the policy will be appropriate for every development and viability could influence whether a development could proceed or not. We suggested the below amendments to ensure the requirements of national policy are met; “All developments will <u>be required to demonstrate ...</u> ” and “The following measures shall be incorporated, <u>where achievable, viable, appropriate and reasonable, into new development</u> ”.	Do not agree. No change proposed. It is considered that this policy allows for sufficient flexibility and states ‘The following measures <i>shall</i> be incorporated.’ Where measures are not achievable, viable, appropriate and reasonable, this will be addressed during the consideration of individual applications for development.
Booker Group PLC	Policy CC4	CC4: Decentralised Energy – The requirements should be subject to viability and allow sufficient flexibility for developers to provide justification to provide carbon reduction measures that are appropriate for the needs of development.	Do not agree. No change proposed. The policy clearly states inclusion is required “unless it can be demonstrated that the scheme is not suitable, feasible or viable”.
University of Reading	Policy CC4	Policy CC4: The Council have made the suggested changes in line with our recommendation and as such it is now considered sound.	Noted. No change needed.
Reading Climate Change Partnership (RCCP)	Policy CC4	CC4 – Whilst CHP has a role to play in reducing carbon emissions in the medium term, overt (and multiple) reference to it appears to be at the expense over other currently viable or future low carbon technologies, and a more broad-ranging statement on low carbon technologies for decentralised energy would be more appropriate.	Do not agree. CHP is emphasised by the NPPF and references to broader low-carbon techniques have also been included.
Reading Friends of the Earth	Policy CC4	Soundness: This is not sound because it takes a short-term view of carbon emissions reduction based on current viability and technology and only requires developers to consider rather than implement decentralised energy provision if this is ‘suitable, feasible and viable’. Gas-fired CHP may be currently suitable and viable compared with grid electricity and gas-fired heating but it is becoming less so as grid electricity is decarbonised, and as ever-tighter emissions targets must be achieved. It must be used as a temporary measure if at all. Future	Do not agree. It is considered that the policy specifies each proposal will be considered on a case-by-case basis, allowing for high standards balanced with viability considerations.

		<p>'energy vectors' to distribute energy to urban developments are likely to be electricity or hydrogen so as to eliminate local carbon emissions. The policy does not require new developments to be prepared to use low-grade heat in the future, if at present only conventional heat sources are judged viable. Modification: Replace Paragraph 2 with "Any development of more than 20 dwellings and/ or non-residential development of over 1,000 sq. m shall include all forms of decentralised energy provision, within the site, that are suitable, feasible and viable. If a low carbon heating system using decentralised energy is not currently viable developments shall future-proof their heating system to allow for low-temperature heat supply from district heating or heat pumps (i.e. by installation of suitably sized underfloor or blown air heat exchangers) even if initially gas or direct electric heating is to be used."</p>	
K2 Developments	Policy CC6	CC6: Accessibility and the Intensity of Development – Our Client supports this policy.	Noted. No change needed.
University of Reading	Policy CC6	Policy CC6: The University support this Policy and consider it sound, however make further comments which should be considered. The University would however wish to state agreement with paragraph 4.1.25 within the supporting text to draft Policy CC6, which supports sustainable, accessible locations as primary locations for new development, including, facilitating convenient access to those associated with the University (staff, students and visitors). In terms of student accommodation (draft Policy H12), the University would support the application of this policy, to focus new student accommodation in sustainable locations with convenient access to public transport (or by foot / bicycle) to services, facilities and the University campus. This would be wholly consistent with national policy.	Noted. No change to CC6 needed. In terms of location of student accommodation, this is dealt with in the response to comments on policy H12.
Environment Agency	Paragraph 4.1.27	4.1.27 – This paragraph again refers to rivers as barriers/constraints rather than as opportunities and features. The emphasis should be changed so that rivers are seen as assets rather than barriers for	No change proposed. The reference makes sense within its context, and there is no need to repeat statements about the opportunities of the

		development.	watercourses that have already been made elsewhere.
Aviva Life and Pensions UK Ltd	Policy CC7	CC7 – As raised in the previous consultation response, it would be helpful to the understanding, clarity and application of the policy if definitions of ‘high quality design’ and major developments’ are provided in the supporting text.	Do not agree. Defining "high quality design" may limit development and is best applied on a case-by-case basis. "Major development" is defined throughout the plan.
Booker Group PLC	Policy CC7	CC7: Design and the Public Realm – Policy CC7 should seek to address the points listed at paragraph 58 of the NPPF in order to ensure compliance with national guidance. We would welcome a policy approach which would provide sufficient flexibility for design of development to be guided through individual circumstances rather than being dictated by strict policy requirements, along with confirmation that design criteria will only be considered where material to an application. We would also welcome a policy that avoids unnecessary prescription or detail and which concentrates on <i>“guiding the overall scale, density, massing, height, landscape, materials and access of new development”</i> in accordance with Paragraph 59 of the NPPF.	Do not agree. It is considered that this policy provides sufficient flexibility. The policy reflects general guidance rather than setting overly prescriptive requirements. Individual circumstances will be assessed during application stage, during which planners will assess positive contributions to broad design objectives rather than focussing on unnecessary detail.
Environment Agency	Policy CC7	CC7: <ul style="list-style-type: none"> • The first sentence in this policy should be amended to read: “All development must be of high design quality that maintains and enhances the character, appearance and ecological value of the area of Reading in which it is located.” • In the second bullet point, add ‘and ecology’ after ‘Landscape.’ • In the third set of bullet points, in the first bullet point insert ‘and ecological’ between ‘historic’ and ‘environment.’ 	Do not agree. Ecology is covered within environment policies.
Historic England	Policy CC7	Policy CC7 and paragraph 4.1.29 - Historic England welcomes and supports the requirement in Policy CC7 for developments to “Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm”, and the supporting text to the policy in paragraph 4.1.29, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by	Noted. No change needed.

		paragraphs 126 and 157 of the National Planning Policy Framework.	
Sonic Star Properties Ltd	Policy CC7	<p>Draft Policy CC7 requires that all development “must be of a high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located”. The policy looks at the following forms;</p> <ul style="list-style-type: none"> • Layout: urban structure and urban grain; • Landscape; • Density and mix; • Scale: height and massing; and • Architectural detail and materials. <p>This policy should include scope for higher density development in accessible / urban locations in order to meet the development targets for Reading as set out in Section 2.2 of the Draft Local Plan and Draft Policy CC6. Draft Policy CR10 sets out the requirements for tall building development and it is noted that this applies only to buildings of 10 storeys or more.</p>	Do not agree. No change needed. This policy does not preclude higher density development in accessible locations. Scope for higher density development in accessible locations is addressed by policy CC6 which states that the scale and density of development will be relating to its accessibility, with the densest and largest scale development taking place in the most accessible locations.
University of Reading	Policy CC7	<p>Policy CC7: The University considers this Policy unsound and recommend amendments. As previously submitted in representations, the University support good design in order to comply with the requirements of the NPPF at paragraphs 56 to 68, which consider ‘good design’. However, the University had recommended that the beginning of paragraph two of the Policy as drafted should include the introductory words “All new development proposals”. Paragraph 2 starts a new sentence and separate requirement of the Policy and as such without this insertion would be unclear, therefore ineffective and unsound when tested against paragraph 182 of the NPPF.</p>	Do not agree. No change needed. The second paragraph continues the sentence beginning “The various components of development form...”.
Sport England	Paragraph 4.1.32	<p>Paragraph 4.1.32 – Sport England welcomes the Council’s inclusion of a reference to Sport England’s Active Design principles.</p>	Noted. No change needed.
Aviva Life and Pensions UK Ltd	Policy CC8	<p>CC8 – Aviva welcomes the more considered approach proposed in policies (CR11 iii and CR13 ii) to ensure that neighbouring sites respect each other and enable equitable development of different parcels to take place, rather than a first to secure planning permission “takes all,” However, we consider that this wording should be incorporated and</p>	No change needed. Policy CC8 is a general statement of the key amenity matters that need to be taken into consideration. The issue of amenity effects considerations within wider development sites in multiple ownerships is

		made explicitly clear within this policy for consistency.	highlighted in the policies where it is expected to arise and does not need to be repeated here.
Sonic Star Properties Ltd	Policy CC8	<p>Draft Policy CC8 requires all development to have no adverse impact on existing and future residential amenity. The policy requires that an appropriate separation distance to protect amenity would be 20m back to back distance. This however is unreasonable in denser urban environments where there is a tighter urban form. The policy as drafted notes, "...although the circumstances on individual sites may enable dwellings to be closer without a detrimental effect on privacy."</p> <p>This flexibility should apply for development in built up / urban / dense environments where reduced separation distances are already an established feature, and where applying prescriptive distances would stifle future development. The policy should include an allowance for the introduction of suitable design measures where they would have an ability to protect existing levels of amenity. In central and urban locations high quality design can often mitigate against potential amenity issues in itself, and the policy should be amended to reflect this.</p>	No change proposed. Delivery of high density development does not mean that important principles of residential amenity have to be or should be compromised. Proposals will still need assessment against these important principles. If a proposal includes suitable design measures as described, then it would be expected to be acceptable in the terms of this policy.
University of Reading	Policy CC8	<p>Policy CC8: The University supports the inclusion of this Policy but considers it is unclear in places and in order to ensure it is effective and therefore soundness, recommend changes. As drafted, the policy is unclear in places, and in order to ensure it is effective and therefore sound, the following changes (which have been suggested before) to the first paragraph are advised:</p> <p>"Development shall not cause an unacceptable level of impact on the general amenities of existing properties, or create unacceptable living conditions for new residential properties, by virtue of adverse impact in terms of:</p> <ul style="list-style-type: none"> • <u>Loss of privacy;</u> • <u>Levels of daylight;</u> • <u>Overbearance and visual dominance;</u> • <u>Visual amenity;</u> • <u>Noise and vibration;</u> 	It is not agreed that the policy is unclear, and it has been applied without confusion for some time through the development management process. The changes are not considered to result in any improvements in clarity. The second paragraph is a significant and frequently applied part of the policy and needs to be accorded adequate policy weight.

		<ul style="list-style-type: none"> • <u>Light disturbance;</u> • <u>Dust and air pollution;</u> • <u>Odour;</u> • Crime and safety; • Wind, where the proposals involve new development of more than 8 storeys. <p>It was also previously recommended that the second paragraph of this policy, which starts “the position of habitable rooms...” is moved into the supporting text to the policy as the wording appears somewhat explanatory and imprecise. It adds little to the effectiveness and soundness of the policy.</p>	
Aviva Life and Pensions UK Ltd	Policy CC9	CC9 – This draft policy proposes that any employment development (not defined) should mitigate its impacts on housing demand. The policy wording would indicate that the LPA may seek a financial contribution from “employment” schemes to pay for residential development (including affordable housing). As a matter of principle, we disagree with this linkage. It is considered overly onerous and tenuous to suggest that non-residential development should be expected to meet worker’s needs. It is out of scale and proportion and is considered unjustifiable.	No change proposed. It is not agreed that this requirements should be abandoned. The extent to which new employment development can put pressure on the housing market and exacerbate housing need is clear. Illustrative of this, the SHMA included an uplift in housing need as a result of economic growth. It is not sustainable for significant amounts of employment development to take place with no supporting mitigation of housing impacts.
Home Builders Federation	Policy CC9	CC9: Securing infrastructure – Parts of this policy are unsound as they are inconsistent with national policy. The requirement in the final paragraph of this policy is unjustified and inconsistent with national policy. The local authority must justify the requirement for a contribution towards the administrative costs of monitoring and implementing S106 charges. The case of Oxfordshire County Council v Secretary of State for Communities and Local Government and others [2015] established that administrative charges must be considered against the regulation 122 ‘necessity’ tests in the same way as other planning obligations. The high court upheld the decision by the planning inspector to strike out a charge to administer, monitor and enforce planning obligations as these were considered to be part of the function	Do not agree. No change proposed. Developer contributions for ongoing local authority costs for monitoring, implementation and payment of planning contributions is required in order to achieve effective infrastructure delivery.

		of the Council’s functions as a Local Planning Authority. We would therefore suggest that the wording of this paragraph be amended to read: <i>“Where justified, necessary and related to the development the Council may require contributions towards the monitoring and implementation of planning obligations.”</i>	
Mapletree Investments Pte	Policy CC9	<p>Policy CC9: Securing Infrastructure – GPR are pleased to see revised policy supporting text relating to the securement of new infrastructure, now acknowledging the contribution existing levels of development already play, as well as their associated transport mitigation measures already agreed or implemented (paragraph 4.1.44). Development at Green Park has a long history of contributing significant amounts to transport infrastructure to mitigate future development impact. GPR maintains therefore, that the approach should continue to be on capturing transport contributions from uplifts in floorspace only, from those developments which have already made significant investments. Reference is still made in the draft policy to new employment development needing to mitigate its potential demand for affordable housing. Whilst GPR recognise that proper infrastructure and housing is in place to support further economic growth in Reading (IDP, 2017), they maintain it is not the role of employment development to fund affordable housing. GPR, therefore, remains concerned about linking employment development mitigation with the provision of affordable housing without up to date evidence that the historic affordability issue in Reading relates to employment development. Housing developments should be the focus for provision of affordable housing contributions. Employment development is a land use priority at Green Park, which means contributions towards housing, in addition to other mitigation measures, creates an unacceptable burden on development. This was demonstrated in the determination of the scheme at 400 Longwater Avenue, Green Park, office development on the Park is at the margins of viability. GPR, therefore, requests that RBC revisit this policy. If it is to be retained, GPR request that in the last sentence of paragraph 4.1.5 that “should” be replaced with “could” and the following words inserted at</p>	<p>Noted. No change proposed.</p> <p>It is not agreed that the requirement for employment to mitigate its impact on housing should be abandoned. The extent to which new employment development can put pressure on the housing market and exacerbate housing need is clear. Illustrative of this, the SHMA included an uplift in housing need as a result of economic growth. It is not sustainable for significant amounts of employment development to take place with no supporting mitigation of housing impacts.</p>

		the end: “and subject to viability to reflect the Supplementary Planning Guidance and the NPPF.”	
Robson, Elaine	Policy CC9	Priority will be given to open space, green infrastructure and other measures to enhance or improve biodiversity. Among those to be considered where a specific need is identified: Off-site street tree and other tree planting (environmental improvements outside the Central Area); Measures to tackle poor air quality or for ongoing air quality monitoring.	Noted. No change needed.
South Oxfordshire District Council	Policy CC9	Policy CC9: Securing Infrastructure – We note the reference in this policy to giving major cross-boundary or sub-regional infrastructure the highest priority. We are keen to work with you to understand further and in more detail the specific locations and justification for any major cross-boundary or sub-regional infrastructure that will impact upon South Oxfordshire.	Noted. No change needed.
Sport England	Policy CC9	CC9: Securing Infrastructure – Sport England supports this policy, but it requires the Reading Playing Pitch Strategy to be completed and adopted to make it robust. There is also the need to refresh and adopt the Built Facilities Strategy with which Sport England assisted the council in 2015.	Noted. A draft has been produced and has been made available to Sport England. It is intended that this will form part of the evidence base.
University of Reading	Policy CC9	Policy CC9: The University considers elements of this Policy to be unjustified and therefore unsound. Changes are recommended. Previous representations on behalf of the University advised that the first paragraph of draft policy CC9 be replaced with the following: “Proposals for development will not be permitted unless infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary by the development will be provided through direct provision or financial contributions <u>or CIL</u> at the appropriate time.” The above suggested change has been partially made by the Council and is welcomed, however, we recommend that CIL is added. However, in order to make draft Policy CC9 sound, as previously advised, the final paragraph, quoted below, should be removed: “Developers are required to contribute towards the ongoing local authority costs of monitoring the implementation and payment of	Do not agree. No change proposed. Developer contributions for ongoing local authority costs for monitoring, implementation and payment of planning contributions is required in order to achieve effective infrastructure delivery.

		planning contributions.” The above requirements are overly onerous and open ended without basis in national policy to support its inclusion. Therefore, it would not be justified and therefore is unsound.	
Historic England	Section 4.2	Heading 4.2 - Heading 4.2 should be entitled “Built, Historic and Natural Environment” as not all historic features are “built”. In fact, the National Planning Policy Framework specifically refers to the historic environment (distinguishing it from the built environment in paragraph 7) and even defines it. It is therefore clear that “built environment” and “historic environment” are not interchangeable terms. Re-title heading 4.2 “Built, Historic and Natural Environment”.	No change proposed. The reasoning for the representation is understood, but the historic environment does fall largely (although not entirely) within the ‘built environment’ heading, and it is not considered to necessitate overcomplicating the heading.
Historic England	Section 4.2	Section 4.2 - Paragraph 154 of the National Planning Policy Framework that requires “clear policies on what will or will not be permitted where” and policies which provide “a clear indication of how a decision maker should react to a development proposal”. We therefore consider that to satisfy these requirements and as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required paragraphs 126 and 157 by the National Planning Policy Framework, a policy or policies should be included in the Plan setting out the important elements or characteristics of listed buildings and registered historic parks and gardens to which development proposals should have regard and seek to conserve or enhance e.g. for Registered Historic Parks and Gardens, safeguarding features which form an integral part of the special character or appearance of the Park or Garden, including its, layout, design, character, appearance or setting of, or key views out from, the Park or Garden. The Local Plan should include specific policies on listed buildings and registered historic parks and gardens, setting out the important elements or characteristics of listed buildings and registered historic parks and gardens to which development proposals should have regard and seek to conserve or enhance. (We would be pleased to advise the Council on the formulation of these policies).	Noted. No change needed. It is considered that details regarding the important elements and characteristics of listed buildings and registered historic parks and gardens are detailed in the Historic England listing for each asset. Policy EN1 requires that development proposals seek to conserve or enhance ‘historic features, areas of historic importance and other elements of the historic environment’.
Natural England	Section 4.2	<u>Policy: NE?</u> <u>Legislation/Plan reference: Paragraph 112 of the NPPF states that; Local</u>	No change proposed. Reading is almost entirely urban, and it is not considered that a policy

		<p>planning authorities should take into account the economic and other benefits of the best and most versatile (BMV) agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.</p> <p><u>Issue type:</u> Compliance with NPPF</p> <p><u>Issue:</u> There is no policy or mention of Best and Most Versatile (BMV) agricultural land. In order to preserve as much BMV land as possible and use areas of poorer quality agricultural land, areas of BMV should be the focus of strategic green infrastructure on development sites.</p> <p><u>Solution:</u> Suggested Policy wording; Council will seek to protect the best and most versatile agricultural land for the longer term. Where development involving best and more versatile agricultural land is proposed, those high value areas on site should be preferentially used as green open space and built structures avoided. Where development would result in the loss of best and more versatile agricultural land, planning consent will not be granted unless there are no other suitable sites of poorer agricultural quality that can accommodate the development.</p>	<p>protecting the best and most versatile agricultural land is necessary, where almost all of the very limited agricultural land falls under other designations in any case.</p>
Rowe, Dr Simon	Section 4.2	<p>Heritage: This may be a matter of opinion, but as well as preserving Reading's heritage and the fine buildings the city possesses, why not also have a hit list of hideous eyesores which should be replaced asap when vacant? The old Energis building opposite Apex Plaza, the old KwikFit building opposite the Prudential building would be on my list. Vacant and unused for years, eyesores for decades. Here too could be listed the many derelict sites around Reading – are there powers available to force these sites to be put back into use?</p>	<p>No change proposed. Where sites are in need of physical regeneration, due to their poor quality and environment, or dereliction, these are generally brought forward as development allocations. It should be noted that both buildings mentioned here have been demolished, and development in their place is complete or underway.</p>
Historic England	Paragraphs 4.2.1-4.2.24	<p>Paragraphs 4.2.1 – 4.2.24 - Historic England welcomes paragraphs 4.2.1 – 4.2.24 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework. However, we find the opening sentence of paragraph 4.2.2 worrying. The National Planning Policy Framework</p>	<p>Partially agree. Changes proposed to remove 'where recognising the pressures of continued development' in paragraph 4.2.2. Change proposed to remove 'which are not necessarily recognised components of the historic environment' from 4.2.23. Change proposed to</p>

		<p>makes it clear that the conservation and enhancement of the historic environment is an integral part of sustainable development and sets out a number of specific requirements for the historic environment in local plans, including:</p> <ul style="list-style-type: none"> • set out a positive strategy for the conservation and enjoyment of the historic environment [126]; • include strategic policies to deliver the conservation and enhancement of the historic environment [156]; • contain a clear strategy for enhancing the natural, built and historic environment [157]; <p>It is therefore clear that the Framework requires local plans to proactively conserve and enhance the historic environment and promote its enjoyment without any caveats such as “recognising the pressures of continued development”. In addition, paragraph 8 of the Framework explains that to achieve sustainable development, “economic, social and environmental gains should be sought jointly and simultaneously through the planning system”. The conservation and enhancement of the historic environment should therefore be pursued alongside meeting development needs, not at the expense of meeting those needs. Furthermore, paragraph 14 makes it clear that local plans should meet objectively assessed needs unless 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 the Framework indicate development should be restricted⁹. Footnote 9 identifies those specific policies as including those relating to designated heritage assets. We therefore consider that the first sentence of paragraph 4.2.2 should end at “enjoyment”, which would reflect the requirements of paragraphs 126 and 157 to proactively conserve and enhance the historic environment and promote its enjoyment. The remainder of that sentence in the Plan “while recognising the pressures of continued development”, rather suggests that the conservation and enhancement of the historic environment and the promotion of its enjoyment is to be balanced</p>	<p>add in EN2, ‘unless there are clear and convincing public benefits’. It is considered that the distinction between designated and non-designated assets is clearly explained in paragraph 4.2.10. Areas of non-scheduled archaeological remains are addressed by policy EN2 and the Proposals Map indicates ‘areas of archaeological potential’. It is not clear what is achieved by stating that there are five Registered Historic Parks in Gardens within the Borough. Nonetheless, this is stated in paragraph 4.2.11. The use of the word ‘preserving’ in explanatory text paragraph 4.2.12 is not considered to harm or contradict the main thrust of the policy. The value of and potential for enhancement is emphasised in EN1 and in supporting text throughout Section 4, for example in paragraph 4.2.23. It is considered that natural heritage is included by the language ‘historic features’ and/or ‘other elements of the historic environment’. Do not agree that paragraph 4.2.12 suggests that development and conserving and enhancing the historic environment are mutually exclusive, particularly when read within the context of explanatory text and policies that encourage both development and conservation and enhancement of the historic environment.</p>
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		<p>against continued development, which is not how we interpret paragraphs 8 and 14 of the National Planning Policy Framework and should be deleted. We consider that it would be helpful if paragraph 4.2.10 could clarify which heritage assets are designated and which are non-designated. Reference should be made to non-scheduled archaeological remains of demonstrably equivalent significance to scheduled monuments. Paragraph 4.2.11 should state that there are five Registered Historic Parks and Gardens in the Borough, to make it clear that these are designated heritage assets. We would prefer “conserving” to “preserving” in the first sentence of paragraph 4.2.12 as terminology more consistent with the National Planning Policy Framework and as recognising that change can take place that maintains, or even enhance, the significance of heritage assets. “Built and natural heritage” should be “built, historic and natural heritage” for the reasons we set out in our comments on the heading 4.2. The second sentence of paragraph 4.2.12, like the first sentence of paragraph 4.2.2, slightly worries us as it could also be construed as suggesting that seeking opportunities for development and conserving and enhancing the historic environment are mutually exclusive. As we point out in our comment above on paragraph 4.2.2, the National Planning Policy Framework requires that “economic, social and environmental gains should be sought jointly and simultaneously through the planning system”. This sentence should reflect the Framework’s position that sustainable development means meeting the need for development and protecting the natural and historic environment. In paragraph 4.2.23, we are not clear what the Council means by “(which are not necessarily recognised components of the historic environment)”. The definition of “historic environment” in the National Planning Policy Framework is wide-ranging: “All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.” In addition, the definition of “heritage asset” in the Framework includes locally listed buildings (i.e. buildings of</p>	
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		<p>local architectural or historic interest).</p> <p>Buildings and features of local architectural and historic interest are therefore “recognised components of the historic environment”. We consider that “(which are not necessarily recognised components of the historic environment)” is incorrect, unnecessary and potentially confusing, and should therefore be deleted. It is appropriate whilst commenting on the section on Heritage to consider whether or not the Local Plan is consistent with the National Planning Policy Framework’s requirement for local plans to “set out a positive strategy for the conservation and enjoyment of the historic environment” and to “contain a clear strategy for enhancing the natural, built and historic environment”. Paragraph 126 of the Framework requires the “positive strategy” to include heritage assets most at risk through neglect, decay or other threats. We therefore welcome paragraph 4.2.16 and the reference to Heritage at Risk in Policy EN1, which we consider satisfies this requirement. Paragraph 126 also requires local planning authorities, in developing this positive strategy, to take into account:</p> <ul style="list-style-type: none"> • the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; • the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; • the desirability of new development making a positive contribution to local character and distinctiveness; and • opportunities to draw on the contribution made by the historic environment to the character of a place. <p>Historic England therefore considers that the positive and clear strategies should comprise recognition throughout the Plan of the importance of the historic environment, of the historic environment’s role in delivering the Plan’s vision and the wider economic, social and environmental objectives for the Plan area, and of the potential impacts of the Plan’s policies and proposals on the historic environment. We have identified a number of references to the historic environment</p>	
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		<p>throughout the Plan, which we have welcomed, and we are therefore satisfied that the Plan fulfils this element of the required positive and clear strategies. We also think the words “positive”, “enhancing” and “deliver” are significant, and we believe that the Plan (and Council) should be proactive in the conservation and enhancement of the historic environment. National Planning Practice Guidance states “Such a [positive] strategy should recognise that conservation is not a passive exercise”. We therefore look to local plans to contain commitments to positive measures for the historic environment e.g. a programme of completing and reviewing conservation area appraisals, the implementation of Article 4 Directions where the special interest of a conservation area is being lost through permitted development, the completion of a list of locally important heritage assets or a survey of grade II buildings at risk. We therefore welcome the references to Article 4 Directions in paragraph 4.2.14, Conservation Area Appraisals in paragraph 4.2.15 (although we would like to see a commitment to completing and reviewing such Appraisals, in accordance with the duty under the Planning (Listed Buildings and Conservation Areas) Act 1990) and to the List of Locally Important Buildings in paragraph 4.2.20. Overall, we are satisfied that the Plan contains both the positive and clear strategies required by the Framework and that it is therefore compliant with the Framework (and thus sound) in this respect. We have produced a revised Good Practice Advice Note: 1: “The Historic Environment in Local Plans”, available on the Historic England website: (http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/) which provides advice on satisfying the requirements of the National Planning Policy Framework as regards the historic environment in local plans. End the first sentence of paragraph 4.2.2 at “enjoyment”, deleting “while recognising the pressures of continued development”. Paragraph 4.2.10 should read “Heritage assets may be formally designated as being of national importance, including listed buildings, conservation areas, scheduled monuments and registered historic parks and gardens, or of local importance such as</p>	
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		<p>industrial heritage sites, non-scheduled sites of archaeological interest and historic landscapes (although some non-scheduled archaeological remains may demonstrably be of equivalent significance to scheduled monuments and will therefore be subject to the same considerations as scheduled monuments) ” Paragraph 4.2.11 should read “Five Registered Historic Parks and Gardens”. Revise the first two sentences of paragraph 4.2.12 to read “Planning is an important instrument for maintaining and enhancing the environment, and conserving built, historic and natural heritage. Planning policy must therefore meet the need for development and protect the natural and historic environment.” Paragraph 4.2.23: omit “(which are not necessarily recognised components of the historic environment)”.</p>	
Theatres Trust	Paragraph 4.2.2	Paragraph 4.2.2: The Trust supports the Plan’s appreciation of investment in heritage and culture being a catalyst for investment and spending in the local economy.	Noted. No change needed.
Bedford, Chris	Paragraph 4.2.6	In 4.2.6, after ‘water’ in line 7, add: ‘The town also became an important stop for coaches on the Bath Road, and numerous fashionable houses mainly fronted in stone or render were built on roads east or west of the old centre.’ The existing wording does not adequately bring out the physical change arising from the greater prosperity cited, which gave rise to some of Reading’s most significant and obvious surviving heritage. Fast coach travel was also significant for Reading.	Agreed. Change proposed.
Conservation Area Advisory Committee	Policy EN1	<p>EN1 PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT</p> <p>After the bullet points listed insert 'identify' where shown below: <i>All proposals will be expected to "identify," protect and where possible enhance the significance of heritage assets and their settings...</i></p> <p>Reason: To demonstrate that consideration of the significance and settings of heritage assets impacted by proposals has taken place and that this has been based on adequate information.</p> <p>EN1 para 4.2.13 Include an additional sentence:</p>	<p>Do not agree. No changes proposed.</p> <p>Identification will be included in Heritage Statements. Heritage Statements will be required by language in EN1 which states ‘Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement’.</p>

		<p><i>"The Design & Access statement should state and justify whether a whether a Heritage Statement is required or not."</i></p> <p>Reason: To ensure that heritage is a formal consideration for all proposals where a Design & Access Statement is required.</p>	
Cowling, Tony	Policy EN1	EN1—Enhancing Conservation Areas could best be done by having fewer, smaller, better quality ones.	Noted. This is dealt with in policy EN3. Reducing the number and area of conservation areas would fail to provide adequate protection to Reading's heritage.
Historic England	Policy EN1	Policy EN1 - Paragraph 156 of the National Planning Policy Framework requires local plans to "include strategic policies to deliver the conservation and enhancement of the historic environment". We therefore welcome and support Policy EN1, both as that strategic policy and as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment, as required by paragraphs 126 and 157 of the Framework. (We are grateful for the changes made to this policy in line with our comments on the draft plan).	Noted. No change needed.
Sonic Star Properties Ltd	Policy EN1	<p>Draft Policy EN1 requires the protection and enhancement of all Designated Heritage Assets.</p> <p>It is recognised that the Council have a legal duty to protect these Designated Heritage Assets under the Planning (Conservation Areas and Listed Buildings) Act 1990. To this end, the policy requires any application that has the potential to affect the significant features of a heritage asset to be supported by a Heritage Statement. The policy does not identify that bringing vacant Listed Buildings back into use for their optimum viable use, is a public benefit and which enables the long term viability of a building to be preserved. This is a key element of the NPPF, and applications which secure the viability of a Listed Building should be supported in principle. Draft Policy EN3 provides a summary of proposals that would be considered improvements to the character and appearance of Conservation Areas. The list does not however include bringing vacant or redundant buildings back into an active use, which has the ability to secure their long term future It is therefore suggested</p>	Do not agree. The need to balance new development alongside the conservation and enhancement of the historic environment is sufficiently addressed. The value of new development is recognised, for example in paragraph 4.2.12 and policy EN6. Do not agree that EN3 needs to be expanded as bringing vacant buildings back would be considered in line with the general thrust of heritage policies. It is not necessary to mention specifically.

		that policy EN3 is expanded in order to recognise the importance of bringing vacant listed buildings back into use. Draft Policy EN6 requires new development within a historical context to ensure it makes a positive contribution to the existing townscape. The policy should recognise the need to balance new development alongside the aims of preserving and enhancing the historical context.	
Conservation Area Advisory Committee	Policy EN2	EN2 Areas of Archaeological Significance 'Significance' should be replaced by 'potential' throughout. Reason: This better captures the requirement here. It also aligns with the key to the Proposals Map which shows "areas of archaeological potential".	Do not agree. No change needed. Historic England is satisfied with the use of the term 'significance'.
Historic England	Policy EN2	Policy EN2 - We welcome and support Policy EN2 Areas of Archaeological Significance, in principle, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework. However, the policy should be more accurately be titled "Sites of Archaeological Significance". In addition, paragraph 132 of the National Planning Policy Framework explains that substantial harm to or loss of designated heritage assets of the highest significance, including, notably, scheduled monuments (and, by virtue of paragraph 139, non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments), should be wholly exceptional. However, paragraphs 133 and 134 of the Framework do allow for there to be harm to scheduled monuments where that harm is outweighed by public benefits commensurate with the level of harm or four particular circumstances all apply. The final paragraph of Policy EN2 is therefore stricter than the National Planning Policy Framework, which could be considered to be a matter of soundness. Amend the heading to "Sites of Archaeological Significance". Reword the final paragraph of the policy: "Development proposals which will have an adverse effect on scheduled monuments and other nationally important archaeological remains and their settings will not be allowed unless there is clear and convincing	Agree. Change proposed.

		justification in the form of overriding public benefits commensurate with the level of harm or the four circumstances in paragraph 133 of the National Planning Policy Framework all apply.”	
Cowling, Tony	Policy EN3	EN3—Whole Street retrofit would be a good way to go with Council-led facilitation.	Noted. This is not a matter for the Local Plan.
Historic England	Policy EN3	Policy EN3 - We welcome Policy EN3 Enhancement of Conservation Areas as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Berkshire Gardens Trust	Policy EN4	We do not find this policy to be sound. Our concerns relate to the absence of comprehensive and explicit references to historic designated landscapes with either a national designation or local value, which are afforded protection by the NPPF. EN4, Locally Important Heritage Assets and Appendix 2 – The criteria for local listing only includes buildings and structures and should be expanded to include small parks, gardens and grounds of some historic buildings, both here and in other parts of the Development Plan where appropriate.	Do not agree. No change proposed. The policies do mention parks and gardens. It is considered that landscapes are included within the setting of historic assets or protected by EN5 and/or EN13.
Historic England	Policy EN4	Policy EN4 - We welcome Policy EN4 Locally important heritage assets as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Berkshire Gardens Trust	Policy EN5	We do not find this policy to be sound. Our concerns relate to the absence of comprehensive and explicit references to historic designated landscapes with either a national designation or local value, which are afforded protection by the NPPF. EN5, Protection of Significant Views with Heritage Interest, Figure 4.2 and Paragraph 4.2.22 – There should be an explicit reference to the fact that this figure shows public views to heritage assets and also to the fact that there will be important views from private land as well as the assets	Do not agree. No change proposed. The policies do mention parks and gardens. It is considered that landscapes are included within the setting of historic assets or protected by EN5 and/or EN13.

		themselves which should be protected and if possible enhanced.	
Historic England	Policy EN5	Policy EN5 - We welcome and support Policy EN5 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Berkshire Gardens Trust	Policy EN6	We do not find this policy to be sound. Our concerns relate to the absence of comprehensive and explicit references to historic designated landscapes with either a national designation or local value, which are afforded protection by the NPPF. EN6, New Development in a Historic Context – This should be amended to refer to ‘respecting’ historic landscape as well as architectural and visual features.	Do not agree. No change proposed. The policies do mention parks and gardens. It is considered that landscapes are included within the setting of historic assets or protected by EN5 and/or EN13.
Historic England	Policy EN6	Policy EN6 - Historic England welcomes and supports Policy EN6 New development in a historic context as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Brommell, Hayley Reynolds, Pamela	Policy EN7	The ESFA proposal to build a school on charity land, held in trust for recreation and leisure only, in perpetuity. The objective is crystal clear and perpetuity means forever and is contrary to policies written in the current Local Plan. This calls into question the effectiveness of any Local Plan if exceptions are being made. Why is RBC disregarding the current local plan relating to green open space [which Reading has one of the lowest people ratios] and supporting [or allowing the proposal to get to the current stage] the ESFA proposal to build a primary school on MPF? This makes a mockery of the entire reason for having a Local Plan. See Draft Local Plan page 40, Section EN7 which lists MPF as site EN7Nn and states that it will be protected from development. <u>CC7: Design and the Public Realm</u> The ESFA school proposal will	No change proposed. Mapledurham Playing Field is identified as Local Green Space in the Local Plan, and is not proposed for development in the document. There is an existing undetermined application for development of part of the area for a primary school. This will be determined on its merits, and is not part of the Local Plan. It is not appropriate to comment upon it here.

		<ul style="list-style-type: none"> • Adversely impact the local character of the playing fields and surrounding area • Address the needs of a very small minority in the community (350 primary school aged children of 171,000 population) • Will be visually unattractive and completely out of keeping (two-storey) with the adjacent single-storey residential properties in Hewett Avenue, Hewett Close and the A4074 Upper Woodcote Rd. • Will dominate the recreation ground and damage quality, character and amenity • Require many areas of mitigation for the proposal to be acceptable • RBC leisure dept. and other official organisations have clearly stated that the school proposal is inadequate <p><u>CC8: Safeguarding Amenity</u> The school proposal will cause significant detrimental impact to the living environment of existing residential properties because of:</p> <ul style="list-style-type: none"> • Reduction to the quality of the environment, infringement of human rights relating to the respect for private and family life • Lack of privacy and overlooking nearby houses • Visual dominance and overbearing effects of the two-storey development • Harm to outlook • Noise and disturbance • Artificial lighting • Hours of operation • Increase of traffic to the immediate area and great risk to the majority of pupils who will have to cross the A4074 <p><u>CC9: Securing Infrastructure</u> The highest priority should be given to:</p>	
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		<ul style="list-style-type: none"> • The loss of open space • Green infrastructure, vital to health and well-being for all age groups • Protection against the adverse effect to biodiversity <p><u>EN7N: Local Green Space and Public Open Space</u></p> <ul style="list-style-type: none"> • MPF is identified as Local Green space EN7Nn for the entire area of 10.86 hectares. • The NPPF states that “local communities, through local plans, are able to identify Local Green Space for specific protection which is of particular importance to them. The aim of this policy is therefore to define the boundaries of Local Green space, based on the criteria in the NPPF. LGS can only be designated during Local Plan preparation or review and must be capable of enduring beyond the end of the plan period. • The Local Community have spoken and written many times to both RBC and the Charity Commission asking for MPF to remain protected for perpetuity because of its particular importance to the high volume of daily users which includes over 500 members of Caversham Trents Football Club, over 500 dog walkers per week, around 350 Mapledurham Lawn Tennis Club members and other casual users. We have demanded a Deed of Dedication be put in place immediately but this request has been declined on several occasions by the Head of Legal Services. • If the Local Plan stands for anything, MPF is a true test case to show the will of the people being upheld by preventing a school from being built there. • 4.2.28 states that “high quality open spaces, sport and recreation can make an important contribution to the health and well-being of communities” • A school at MPF will detrimentally affect air quality due to 350 cars, twice per day, dropping off and collecting children from 	
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		<p>school, as well as arrival of teachers, assistants, administrators, delivery vehicles and buses. Measures, such as those shown in the Air Quality Management Area, will do little to mitigate these effects and the impacts to health and well-being of local residents.</p> <ul style="list-style-type: none"> • A school will also cause a detrimental impact to those items listed under CC* above. <p><u>RL6: Protection of Leisure Facilities and Public Houses</u></p> <ul style="list-style-type: none"> • MPF has a pavilion which is the only community inclusion hub in the entire area west of the A4074 in Caversham. Loss of this facility would mean that there is nowhere in the vicinity for local groups of all ages to hold clubs and many other events that cannot be held in other venues, such as school halls, due to the limitations of use during school hours. These include pre-school and after school clubs, all of which limit the use of such facilities to the point they cannot fulfil the needs of the local community groups. The same community has been denied a community hub for the last two years, this cannot continue and work should begin immediately. <p><u>Need for a school questionable</u></p> <p>An important point to note is that the business case to build a school on MPF was predicted on a childbirth forecast produced for 2009 to 2015. There has been no update of primary school forecasts since the report which was submitted to the ESFA by parents in April 2012. Data now available from the Office of National Statistics, produced 6 yrs. later, shows a marked decline in birth rates between 2009 to 2015, which has dropped by 84. This means that effectively 84 fewer primary school places in Caversham will be needed by 2020. This eliminates the long-term need for additional primary school places north of the River Thames as the number of new children could easily be accommodated in the existing primary schools in the area. If primary school places are</p>	
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		<p>needed, these can be addressed by other solutions. An officer from RBC for education talked about contingency plans which exist. The best option probably being to invest in expanding existing primary schools and protecting the open space at MPF through a volunteer run enhancement scheme. Why are RBC not developing the site of Caversham Primary School which would amply cater for the number of children proposed? CPS is the epicentre of where the majority of pupils live – why would the Council choose to build the school in the furthest periphery of the catchment area which would mean children walking across a busy A-road to reach MPF? Why haven't RBC offered Hemdean Bottom as a site for the school? A site that they already own, in the centre of catchment area and where the Council had originally planned to build a new school in the 1990s? The school should be built on a brownfield site.</p> <p>If the current, existing Local Plan has been strictly adhered to with regards to MPF, residents would not now have been suffering 4 years of anxiety and stress, never knowing whether RBC will ignore that Plan by overriding its own mandate to protect public green open spaces and especially MPF, in order to allow the school to be built. This is despite the need for the school to be highly questionable and the fact that the entire site should be protected for perpetuity by the Recreation Ground Charity 304328 trust. On this basis alone, it is questionable as the whether the Local Plan is a) legally compliant, b) sound, c) fulfils the duty to co-operate, as it is currently failing on all three counts. For the Local Plan to be effective, it must be robust, and importantly, upheld in every respect by RBC throughout the duration of its life.</p>	
Brommell, Martin Holland, John	Policy EN7	The context around which my representations are based are the current actions of RBC, acting as trustees of the Recreation Ground charity 304328, in which they are allowing a proposal by the ESFA to progress. This is contrary to policies written in the current Local Plan. This calls into question the effectiveness of the Local Plan over lengthy periods of time. The current proposal being considered by RBC is to allow a 350	No change proposed. Mapledurham Playing Field is identified as Local Green Space in the Local Plan, and is not proposed for development in the document. There is an existing undetermined application for

		<p>pupil primary school to be built on public green open space at Mapledurham Playing Field, which is charitable trust land and classified LGS. The land was generously gifted to the residents of Reading Borough and Mapledurham Parish in 1938. The object of the trust governing the site is the provision of recreation and leisure facilities only (not education) at MPF for perpetuity. This objective is crystal clear and perpetuity means forever. Attempts to progress the ESFA proposal fly in the face of sections of the Draft Local Plan and specifically Page 40, Section EN7 which lists MPF as site EN7Nn and states: <u>“The following Local Green Spaces (LGS) and Public Open Space (POS), as shown on the Proposals Map, will be protected from development. <u>Proposals that would result in the loss of any of these areas of open space, erode their quality through insensitive adjacent development or jeopardise their use or enjoyment by the public, will not be permitted.</u>”</u> If such insensitive developments will not be permitted, why has the RBC sub-committee and RBC Head of Legal Services allowed the ESFA’s proposals to progress instead of immediately preventing progression of the ESFA’s proposals by upholding the Local Plan governance? Allowing the ESFA proposals to reach the stage they have, makes a mockery of the entire reason for having a Local Plan. This needs to be quickly addressed. I wish to challenge the following sections of the Draft Local Plan specifically against the ESFA case to build The Heights school on MPF.</p> <p>CC7: Design and the Public Realm – The ESFA school proposal will</p> <ul style="list-style-type: none"> • Adversely impact the local character and distinctiveness of the playing fields and surrounding area. • The Heights school will only address the needs of a very small minority in the community, some 350 primary school aged children, out of a total population of beneficiaries of 171,000. The remaining 170,650 will be disadvantaged by the school if it goes ahead. • If the school is allowed to be built, it will be visually unattractive and completely out of keeping with the single storey residential 	<p>development of part of the area for a primary school. This will be determined on its merits, and is not part of the Local Plan. It is not appropriate to comment upon it here.</p>
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		<p>properties which are in close proximity situated in Hewett Avenue, Hewett Close, Blagrove Lane, A4074 Upper Woodcote Road.</p> <ul style="list-style-type: none"> • MPF is a highly valued residential area, worthy of protection from the damaging and insensitive development being proposed by the ESFA. • A school will dominate the recreation ground and cause damage to the quality, character and amenity of the entire area. <p>CC8: Safeguarding Amenity – The ESFA Heights school proposal will cause a significant detrimental impact to the living environment of existing residential properties in the vicinity because of:</p> <ul style="list-style-type: none"> • Privacy and overlooking • Visual dominance and overbearing effects of the development • Harm to the outlook • Noise and disturbance • Artificial lighting • Hours of operation • Effects of traffic movements • Reduction to the quality of the environment <p>CC9: Securing Infrastructure – The highest priority should be given to:</p> <ul style="list-style-type: none"> • The loss of open space • Green infrastructure, vital to health and well-being for all age groups • Protection against the adverse effect to biodiversity <p>EN7Nn Local Green Space & Public Open Space</p> <ul style="list-style-type: none"> • MPF, referenced EN7Nn is classified as LGS for the entire area of 10.86 ha • Item 4.2.2.5 states “The NPPF states that local communities, through local plans, are able to identify LGS for specific protection which is of particular importance to them. The aim of this policy is therefore to define the boundaries of LGS, based on the criteria in the NPPF. LGS can only be designated during 	
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		<p>local plan preparation or review and must be capable of enduring beyond the end of the plan period.”</p> <ul style="list-style-type: none"> • The Local Community have spoken and written many times to both RBC and the Charity Commission asking for MPF to remain protected for perpetuity because of its particular importance to the high volume of daily users which includes over 500 members of Caversham Trents Football Club, over 500 dogs walkers per week, around 350 Mapledurham Lawn Tennis Club members and other casual users. We have demanded a Deed of Dedication be put in place immediately but this request has been declined on several occasions by the Head of Legal Services. • If the Local Plan stands for anything, MPF is a true test case to show the will of the people being upheld by preventing a school from being built there against the desire of a small minority group of people who would like a school there. • 4.2.28 states that “high quality open spaces, sport and recreation can make an important contribution to the health and well-being of communities.” • If a school is built on MPF it will detrimentally affect air quality and significantly worsen it because of the high concentration of up to 350 cars, twice per day, dropping off and collecting children from school. There will also be the arrival and departure of teachers, assistants, administrators, delivery vehicles and buses for school trips etc. Measures, such as those which are shown in the Air Quality Management Area report will do little to mitigate against the drop in air quality and resultant impact to the health and well-being of local residents. • A school will also further causes a detrimental impact to those items listed at CC8 above including noise pollution, traffic movement, light pollution, impact to the biodiversity and wildlife, overbearance and overlooking, out of keeping with all other residential structures in the area and much more. 	
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		<p>RL6 Protection of Leisure Facilities and Public Houses – MPF has a pavilion which is the only community inclusion hub in the entire area west of the A4074 in Caversham. Loss of this facility would mean that there is nowhere in the vicinity for local groups of all ages to hold clubs such as Bridge, Scrabble, Scouts, Guides, Playgroups, Toddler Groups, Farmers Market, Fund Raising and many other events which cannot be held in other venues, such as school halls, due to the limitations of use during school hours. These include pre-school and after-school clubs, all of which limit the use of such facilities to the point they cannot fulfil the needs of the local community groups.</p> <p>Proposals to build a primary school should not take precedent over the protection of public green open space, which is in short supply across Reading Borough, and especially trust land which RBC does not own.</p> <p>An important point to note is that the business case to build a school on MPF was predicted on a childbirth forecast produced between 2009 and 2015. There has been no update of primary school place forecasts since the report which was submitted to the ESFA by parents in 16 April 2012. Data now available from the Office of National Statistics, produced 6 years later, shows a marked decline in birth rates between 2009 and 2015, which has dropped by 84. This means that effectively 84 fewer primary school places in Caversham will be needed by 2020. This eliminates the long term need for additional primary school places north of the River Thames as the number of new children could be easily accommodated in the existing primary schools in the area.</p> <p>If primary school places in Caversham are needed, these can be addressed by a number of other solutions available to RBC which will address provision of education in the area without the need to sell off trust land and lose green public open space. An official from RBC for education talked about contingency plans which exist and could be implemented with immediate effect. The best option probably being to</p>	
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		<p>invest in expanding existing primary schools and protecting the open space at MPF through a volunteer run enhancement scheme.</p> <p>I am aware that the representations made at this stage will feed directly into the public examination of the Local Plan, which is expected to take place during Spring/Summer 2018, and appreciate that such representations at this stage will be provided to the independent Inspector appointed to examine the plan as evidence, and will therefore need to be published on the Council’s website. I welcome my representations being published and would further welcome the opportunity to attend that meeting and voice an opinion with regards to the importance of the Local Plan being upheld. If the current, existing Local Plan had been strictly adhered to with regards to MPF, residents would not now have been suffering 4 years of anxiety and stress, never knowing whether RBC will ignore that Plan by overriding its own mandate to protect public green open spaces and especially MPF, in order to allow a school to be built. This is despite the need for the school to be highly questionable and the fact that the entire site should be protected for perpetuity by Recreation Ground Charity 304328 trust. On this basis alone, it is questionable as to whether the Local Plan is a) legally compliant, b) sound, c) fulfils the duty to co-operate, as it is currently failing on all three counts. For the Local Plan to be effective, it must be robust and, importantly, be upheld in every respect by RBC throughout the duration of its life expectancy. I would appreciate an acknowledgment of receipt of my representations and will await your instructions in due course with regards to being invited to present them to the independent inspector as required.</p>	
Appleton, Patricia	EN7: Local Green Space and Public Open Space	It is difficult, without detailed knowledge of the relevant legislation/requirements to make specific comment on the meeting of any tests of soundness, legality and/or whether any duty to co-operate has been complied with in regard to the draft. I would like, however, to support the justification/soundness of any measures taken in the draft Local Plan to protect local green space in Reading, including using the	<p>No change proposed.</p> <p>Mapledurham Playing Field is identified as Local Green Space in the Local Plan, and is not proposed for development in the document.</p>

		<p>local green space designation, in particular with regard to Mapledurham Playing Fields which is local to me (and which includes one of the few areas of playing fields in the area which are not either under school control or subject to flooding.) Reading has gone and is going through extensive development and it is essential to ensure that this is sustainable by ensuring that there is no further erosion of publicly/freely accessible/usable green space and that existing green spaces/recreational facilities are preserved and improved. Reading has an obesity problem, which puts lives at risk and pressure on our hard pressed health services http://news.reading.gov.uk/council-sets-out-position-on-tackling-obesity-in-reading/. In addition open spaces are essential to improving air quality and general wellbeing. We need to invest in maintaining open spaces and associated leisure facilities and making open spaces attractive to, and entirely accessible to, the public at large. This includes ensuring that, as a minimum, public toilets are available so that people from the widest possible community can access them (not just those who can pop home to use the toilet). Many parts of London, for example, have lots of green spaces with attractive leisure amenities – making them more likely to be used. Having these designations it is important that the Council/planning do not simply play lip service to them. Once public green space is lost, the opportunity to recover/replace it is unlikely ever to arise (or be affordable).</p>	
Cllr White, Rob	EN7	<p>I disagree with the assessment of the site (Coal Woodland). I would like for Coal Woodland to be designated Local Green Space. It doesn't make sense to say that one section of the Coal Wood is Local Green Space and the other isn't. The average person walking through the 2 areas would say they are similar. If you agree with the area that is currently Local Green Space then it all must be Local Green Space. The boundary between the two sections of the Wood is arbitrary. It would make far more sense to include all of the wooded area up to the River and railway land as Local Green Space. The area is close to Newtown which it serves. It is special and beautiful as it is the nearest woodland to Newtown which is the most densely populated part of Reading and lacking in the</p>	<p>Do not agree. No change proposed. The NPPF outlines very specific criteria for LGS designation which this site does not meet. The most significant areas of the Coal Woodland have been protected. More detail is provided in the Local Green Space and Public Open Space Background Paper.</p>

		<p>green spaces. I personally enjoy walking in the woods – as do many others – which is a form of recreation. Tranquillity is relative, and compared to the busy main roads this area is tranquil. It is physically connected to Newtown. It forms part of the Kennet Mouth of landscape. And as the name of the Wood suggests it is reclaimed industrial land giving it a local connection. Finally as you are aware the council wants to build the East Reading Mass Rapid Transit road through this site, and I can't help but think that this is the reason this area has not been protected in the past and this is the reason the council is reluctant to protect this site now.</p>	
<p>Launchbury, Amanda</p>	<p>EN7-EN14</p>	<p>My only concern is the lack of emphasis on our (very limited) parks and public spaces. I've living in Reading for 44 years and in that time it's grown from a large market town to, for want of a better word, a city – busy and bustling. However, I do feel that other cities have far more acceptable ratios between developed land and open, green public spaces. Reading is essentially office buildings, shops, warehouse and housing. In my local area alone, RBC have closed a council-run old peoples' home and replaced it with as many small luxury flats as they could fit on the site. Obviously this increases the strain on the immediate environment and all local amenities. I would like to see in place a ratio that is addressed. When the population is increased in the area because of housing development, that the relevant amenities, school places, shops, transport and green open space have been carefully considered first. I believe careful planning and finance needs to be injected into any area where housing is increased to rebalance the community and its environment – this should be included within all future building/development plans. This brings me on to my main concerns. Compared to other cities, I feel Reading is massively lacking in open green recreational spaces. If we exclude land within Reading's floodplain (because we can assume the Council would have built on this land, if it were possible) our environment is shockingly concrete. I'd like to know what plans/powers/laws will be in place to insist RBC comply with residence wishes to not just encourage existing open green spaces</p>	<p>Do not agree. No changed proposed. The amount of open space in Reading is broadly in line with national guidelines. Policies EN7, EN8, EN9 and EN10 seek to protect existing open space whether designated or undesignated, require new open space within major developments and improve access to existing open spaces. More information is available in the Local Green Space and Public Open Space Background Paper, as well as the Open Spaces Strategy 2018 Update Note.</p>

		<p>but also create more parks and spaces, especially as our population expands. What is in place to prevent RBC over-riding any suggestions you have made in this report? Or ignoring any policies agreed by government or bulldozing through 'legal trusts' on open spaces and recreation grounds? How do we prevent them from developing and building schools or housing on these spaces regardless? If all your draft can accomplish are preferred guidelines that the planning and development of Reading can hope to achieve; it will all sadly be pointless if at any point RBC can override your guidelines just to achieve and fore-fill their housing/schooling/development quotas.</p>	
Shabani, Jennifer	EN7n: Mapledurham Playing Fields	<p>My name is Jennifer Shabani and I am a local Reading resident. I have just read the draft Local Plan Section EN7N Item EN7Nn and would like to voice my objection EFA's proposal to building of the Heights Primary School on Trust land at Mapledurham Playing Fields. Prior to that I have re-read the report by the Director of Environment and Neighbourhood Services to the Heights Free School Sub-committee dated 11th October 2016. This report is not particularly favourable to the school proposal and there were clearly reservations. In regard to the draft Local Plan Section EN7N item EN7Nn, whatever happened to RBCs commitment to green open spaces for the benefit of local residents to foster their wellbeing? Why has his been dropped to try to accommodate the EFA's proposal? Not only is green space being lost and not being replaced by equivalent alternative sites, the plan to break a charitable trust set up solely for recreation not education is not acceptable. The ESA's proposal not only goes against RBCs own draft Local Plan, but would have a negative impact on the surrounding environment in terms of increased traffic movements and resulting raised levels of air pollution. The idea that most families would walk with their children to the proposed school is an unknown and not very likely. The number of school aged children is actually falling and the bulge years are temporarily over. This site was never meant for a school and could be needlessly ruined. Should the school be built, what about the many years to come. Any short term financial investment would soon dry up and what then? RBC points out</p>	<p>No change proposed.</p> <p>Mapledurham Playing Field is identified as Local Green Space in the Local Plan, and is not proposed for development in the document. There is an existing undetermined application for development of part of the area for a primary school. This will be determined on its merits, and is not part of the Local Plan. It is not appropriate to comment upon it here.</p>

		<p>the lack of sufficient open green spaces north of the river, so why take away any? Having said that, I was interested to read that bugs bottom actually has more open green space. I would also very much like to know what happened to the section 106 money which developers paid when those houses were built. There must have been a very substantial amount of money paid. Where did this go, as no school or health centre was built? I have so far found RBC biased in their treatment of this case and was particularly alarmed about the lack of democracy when the chair of a public meeting forbids the members of the Height Free School Committee to answer questions. I never thought I would witness such a thing. Nothing in any of this process has given me confidence that justice will be done and I fear for the future.</p>	
<p>Allcock, Paul Ayres, Anne Ayres, Robert Brown, Sara Bureau, Lucy Chapman, Mark Clark, Nick and Susan Connell, Caroline Connell, John Cunningham, Vivien Darlow, Philip Eberst, Alan Fraser-Harding, Kathleen Fraser-Harding, Tim Harding, Barbara Heaps, John Howes, Michael Hutt, Mr and Mrs K A Hutt, Kim Jarakana, N Lauria, Dr S Myerscough, Paul Phelan, Mary</p>	<p>EN7Nn: Mapledurham Playing Fields</p>	<p>I write with reference to the draft Local Plan Section EN7N Item EN7Nn:</p> <ol style="list-style-type: none"> 1. Why is the current Local Plan being ignored in favour of RBC supporting the ESFA’s proposals to build a school on Mapledurham Playing Fields, which is designated green open space and held in trust exclusively for recreation? 2. How will the new Local Plan be strengthened to overcome future threats to green open space, especially when it is held in trust? 3. In particular how will it safeguard against the following factors, which cannot be mitigated and will significantly impact Mapledurham Playing Fields, if the EFSA proposal is implemented: <ol style="list-style-type: none"> a. Traffic movements b. Air pollution c. Noise pollution d. Visual dominance and overbearing on the area of the site where they propose to build e. Privacy and overlooking f. Out of character with local residential properties g. Light pollution h. Impact to other users i.e. tennis club, dog walkers, 	<p>No change proposed.</p> <p>Mapledurham Playing Field is identified as Local Green Space in the Local Plan, and is not proposed for development in the document. There is an existing undetermined application for development of part of the area for a primary school. This will be determined on its merits, and is not part of the Local Plan. It is not appropriate to comment upon it here.</p>

<p>Raeburn-Ward, D P Rankin, Lynn Roark, Sally Sarson, Euan Sherwood, Niamh Sherwood, Robert Smith, Paul Spires, Susan Stuart, Dr Ranald Tait, Susan Thomas, Robin Treadwell, W. Varley, Gillian Wells, Alan Wells, Deanna</p>		<p>footballers, casual visitors</p> <ul style="list-style-type: none"> i. Hours of operation j. Reduction to quality of the environment <p>4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of EFSA proposal?</p>	
<p>Asquith, Dr Peter L</p>	<p>EN7Nn: Mapledurham Playing Fields</p>	<p>I understand that a new Local Plan is being developed which may offer less protection for the Park, which is a designated green open space and held in trust exclusively for recreation, having been kindly donated by a local citizen for the benefit of local residents. Will this plan overcome any future threats to the open space, on which any building or development should be prevented? One in three primary age children are obese and it is crucial that their welfare should be protected and encouraged.</p>	<p>No change proposed.</p> <p>Mapledurham Playing Field is identified as Local Green Space in the Local Plan, and is not proposed for development in the document. There is an existing undetermined application for development of part of the area for a primary school. This will be determined on its merits, and is not part of the Local Plan. It is not appropriate to comment upon it here.</p>
<p>Bickerstaffe, Jane</p>	<p>EN7Nn: Mapledurham Playing Fields</p>	<p>I don't know if the Local Plan is legally compliant, sound or fulfils the duty to co-operate. I hope that the Council has the appropriate expertise to ensure this. I would like the Plan to specifically state that it will protect all existing Local Green Spaces and Public Open Spaces and ensure there are not used for building houses or schools. In particular, I would recommend that it annotates the reference to Mapledurham Playing Fields with a note that the land is protected by a Trust to be used solely for sport and leisure purposes and this Trust should never be broken. I do not wish to appear in person at the public examination.</p>	<p>No change proposed.</p> <p>Mapledurham Playing Field is identified as Local Green Space in the Local Plan, and is not proposed for development in the document. There is an existing undetermined application for development of part of the area for a primary school. This will be determined on its merits, and is not part of the Local Plan. It is not appropriate to comment upon it here.</p>

Everitt, Nicholas	EN7Nn: Mapledurham Playing Fields	<p>As a Caversham resident, I feel compelled to register my objections to the EFA proposal to build the Heights Primary School on MPF – Land held in Trust for recreational use, not educational use. Throughout this process I have been alarmed and at times baffled by the RBC’s approach to this matter. As a parent of two primary school age children, I’m all too aware of the pressure on places which built up over the last 5 years. However, it seems obvious that this pressure was a longer term failure in planning, and particularly in the Caversham area, the building of a large development of family homes on Bugs Bottom with no corresponding local infrastructure, i.e. a school. I would like to know how this all came about. It is also obvious that the vast majority of the potential future and current intake for the Heights will live in the Caversham Heights area to the East of the A4074. A very small proportion of the intake will live on the West of the A4074, meaning that children will have to cross a busy road at the busiest time of day. The end results will be very predictable, particularly given the inadequate road alterations proposed. Those children who do walk to school will face unnecessary danger, and more parents will take to their cars to transport their children to and from school, thus further compounding the traffic management issues we see on the A4074 at peak times. The modelling suggesting relatively high rates of journeys to and from school on foot just are not plausible. In the real world, busy parents will have no choice but to make journeys by car. I would love to understand how the EFA proposal can be reconciled with RBC’s commitment to open, green spaces for the benefit of local residents. This proposal will remove exactly that thing, replacing it with a school in the wrong part of Caversham, creating a highly questionable future for the Pavilion, and opening the door to future development of land held in Trust specifically for recreational use. It really does not reflect well on RBC.</p>	<p>No change proposed.</p> <p>Mapledurham Playing Field is identified as Local Green Space in the Local Plan, and is not proposed for development in the document. There is an existing undetermined application for development of part of the area for a primary school. This will be determined on its merits, and is not part of the Local Plan. It is not appropriate to comment upon it here.</p>
Holt, Graham	EN7Nn: Mapledurham Playing Fields	<p>I am writing to you to express my continued concern with regard to the way that the Planning Application entered by the EFSA for the proposal to build The Heights School on Mapledurham Playing Fields is being</p>	<p>No change proposed.</p> <p>Mapledurham Playing Field is identified as Local</p>

	<p>processed. I am deeply concerned that the various parties involved with decision making on the issue seem to have missed or ignored the various points that have been made by so many long standing residents of this area. Firstly – this land does NOT belong to RBC. It is held in trust for the benefit of ALL for recreation purposes. Due to the fact that part of this land is a level site, this area has been selected as an easy location for the building of a school with apparently no respect for its ‘Trust status’ and no consideration for the needs of local residents and visitors. There also seems to be little respect for current recreation requirements or for the benefit of future recreational needs for ensuing generations. Surely this must be contrary to the Local Plan which has apparently been ignored in order to expedite this application. Secondly – and should this school be built, then it is feared that the amount of traffic this will generate from the dropping off of pupils, deliveries and visitors, etc., throughout the day, will almost certainly cause mayhem on the adjacent A4074 road in both directions. Has the possibility of this situation been properly assessed? Is there no concern amongst Planners for the intrusion of extra traffic movements, related air pollution, plus related noise pollution, that would undoubtedly occur? I strongly feel that these factors are important for the benefit of the existing and future residents in the locality. Surely, the essence of good planning is to ensure that the benefits of good living conditions are maintained or enhanced. Thirdly – the area allocated for School location is adjacent to a number of existing residential properties and will, for them, result in visual dominance, loss of privacy, light pollution and will be out of character with the locality. Finally, may I ask what plans, if any are there in place to demonstrate commitment by Reading Borough Council to the current Local Plan and what measures are there in place to protect MPF from the threat of the EFSA proposal? This also raises the question <u>why</u> the current Local Plan is being ignored in the favour of the EFSA proposal. I feel very strongly that this Proposal is very wrong and has been encouraged/allowed to progress by a lot of people who are focussed on obtaining an immediate result rather than in considering the effect that an approval for this</p>	<p>Green Space in the Local Plan, and is not proposed for development in the document. There is an existing undetermined application for development of part of the area for a primary school. This will be determined on its merits, and is not part of the Local Plan. It is not appropriate to comment upon it here.</p>
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		proposal would have on the living conditions and accepted way of life of current residents in this entire local area and for those who will follow in the future. I hope that my comments will be acceptable for your consideration of this matter.	
Jamieson, Brian	EN7Nn: Mapledurham Playing Fields	An important Public Open Space, Mapledurham Playing Fields (MPF) is currently under threat of development. The Education and Skills Funding Agency (ESFA) has made a proposal to acquire part of MPF as a site for a new primary school. RBC, as Trustee of the MPF, is currently considering the approach from the ESFA. The current Reading Local Plan Policy CS28 provides some protection against this unwelcome development. To date, it is unclear whether or how this policy is bearing on the proposals from the ESFA. It seems not to have discouraged RBC, as trustee, from giving the proposal serious consideration. Turning to the Pre-Submission Draft Local Plan, it seems to provide even more protection from development on public open spaces. Policy EN7 includes MPF in the extensive list of Readings LGS and POS. This appears to give reassurance that the current development proposal will not be permitted. However, any reassurance is somewhat undermined by the knowledge that the Council's Mapledurham Playing Fields Sub-committee is racing ahead with its consideration of the ESFA's proposal and that an outline planning application for a school on MPF has already been submitted to the Council's Planning Dept. My concern about the Pre-Submission Draft Local Plan, therefore, is whether and how its provisions will be enforced by Reading Borough Council in the case of MPF and, indeed, any other LGS and POS under threat of development? Or is the Plan just a public reactions exercise without teeth? I should point out that, if the planning application for the school was to be called in by the Secretary of State, it is self-evident that the policies of the Draft Local Plan would be a key determining factor.	No change proposed. Mapledurham Playing Field is identified as Local Green Space in the Local Plan, and is not proposed for development in the document. There is an existing undetermined application for development of part of the area for a primary school. This will be determined on its merits, and is not part of the Local Plan. It is not appropriate to comment upon it here.
Monks, Pauline	EN7Nn: Mapledurham Playing Fields	When a child or parent is involved in an accident on Woodcote Rd, I hope you will see the error of your ways. Nothing has ever been done to slow traffic down or stop lorries on that road, and you expect dozens and dozens of extra cars trying to get in out of that small entrance and	No change proposed. Mapledurham Playing Field is identified as Local Green Space in the Local Plan, and is not

		<p>children walking, maybe to school. I would not want your conscience. Find a safer location for all our sakes, and surrounding housing that will have to put up with all the disruption. As will I with my dogs. Why not use the allotments, good bit of land there.</p>	<p>proposed for development in the document. There is an existing undetermined application for development of part of the area for a primary school. This will be determined on its merits, and is not part of the Local Plan. It is not appropriate to comment upon it here.</p>
<p>Stuart, Dr Ranald</p>	<p>EN7Nn: Mapledurham Playing Fields</p>	<p>As conflicted trustees of Mapledurham Playing Fields, why precisely and in all sincerity are RBC not adhering to the current Local Plan which would help to protect Mapledurham Playing Fields from the proposals of the EFSA?</p> <p>Why are RBC not developing the site of Caversham Primary School which would amply cater for the number of children proposed? Caversham Primary School is the epicentre of where the majority of potential school pupils currently live – why would the Council choose to build the school in the furthest periphery of the catchment area, 1 mile from the epicentre of the catchment area in central Caversham, which would mean children walking or bring driven up a steep hill and across a busy A-road to reach MPF?</p> <p>If intent upon building a new school, why don't Reading Borough Council build it in Hemdean Bottom, a site that they already own, sited in the centre of the catchment area and where the Council had originally planned to build a new school in the 1990s? It could have been built by now!</p> <p>I request that my questions and comments are also given to the independent Inspector appointed to examine the proposed new Local Plan. Please send confirmation when this has been undertaken.</p> <p>I do not enjoy having to write to object in this fashion, but such is the anger that the EFSA proposals have caused in the local community around MPF; I regret to say that the way that senior council officials</p>	<p>No change proposed.</p> <p>Mapledurham Playing Field is identified as Local Green Space in the Local Plan, and is not proposed for development in the document. There is an existing undetermined application for development of part of the area for a primary school. This will be determined on its merits, and is not part of the Local Plan. It is not appropriate to comment upon it here.</p>

		have repeatedly behaved in this process over the past few years have been shameful.	
Thomas, Rosemary	EN7Nn: Mapledurham Playing Fields	I have received an email with instructions on how to contact you and which questions to ask. I am fed up with being used as incipient complaint fodder and don't ask you any questions.	Noted. No change needed.
Sport England	Policy EN7	EN7: Local Green Space and Public Open Space – As mentioned previously, Sport England has reviewed the 'local green space assessment matrix' April 2017 and welcomes the Council's inclusion of a number of playing fields being identified as local green space (see paragraphs 76 and 77 of the NPPF). However, we are concerned that the issues of potential Artificial Grass Pitches (AGPs) have not been addressed here. If an AGP (with floodlighting and high fencing) is proposed at any of these locations, it is important that the Council considers designating these in the plan to ensure that the principle of these developments in these locations is acceptable. Not to do so could cause planning blight for clubs who own, lease or play on any sites listed, and could stop them growing and expanding if they could not gain planning permission.	Do not agree. No change proposed. It is considered that specific reference to Artificial Grass Pitches is unnecessary. AGP will be considered on these sites so long as they do not result in loss of open space, erode quality of jeopardise use and enjoyment by the public. Applicants will have the opportunity to demonstrate that AGP will contribute to open spaces in the Borough.
Sport England	Paragraph 4.2.29	Paragraph 4.2.29 – reference is made to the Council's open space strategy which was published in March 2007. This is certainly out of date and I do not consider it to be robust and it is therefore contrary to the NPPF paragraph 73. Either the strategy is updated, or the reference to it needs to be removed. I am aware that Reading has been carrying out a playing pitch strategy for some time, but I am concerned that the data could be out of date by the time it is published or it will need refreshing at the very least.	No change proposed. The Open Space Strategy has been updated by an Open Space Strategy Update Note (2018) which looks at what has changed over the last ten years, and concludes that the findings of the OSS remain relevant.
Berkshire Gardens Trust	Policy EN8	We do not find this policy to be sound. Our concerns relate to the absence of comprehensive and explicit references to historic designated landscapes with either a national designation or local value, which are afforded protection by the NPPF. EN8, Undesignated Open Space and Paragraph 4.2.3 – The spaces referred to in this policy may also have an historic value, which should	No change proposed. The policy seeks to largely protect spaces for their amenity and recreation value. Where there is heritage significance, this should be covered by other parts of the plan.

		be reflected in the text alongside the reference to recreational and amenity resources.	
Sport England	Policy EN8	EN8: Undesignated Open Space – Sport England is still concerned that the list for EN7 may not include all playing fields in the Borough, as acknowledged in the Council’s forthcoming playing pitch strategy. For example, there are also a number of school playing fields and sports facilities (e.g. artificial pitches) that whilst controlled by education authorities are used by the public and have not been included in this list. Sport England is concerned that EN8 may not provide sufficient protection for these playing fields from school development or other types of development. Sport England therefore recommends that the play includes a separate policy that will protect playing fields from development.	No change proposed. The list in EN7 does not include all playing fields, and is not intended to. The sites in EN7 are those which are of such importance that they should be protected on their own merit, whilst the Council’s understanding of the NPPF on playing fields is that if adequate replacement provision can be achieved loss may be possible. Policy EN8 deals with undesignated open space, which will include all playing fields, and its content is more in line with this level of protection.
Natural England	Policies EN9, EN11, EN12	<u>Policy:</u> EN9, EN11, EN12, and associated text of the Plan. <u>Legislation/Plan reference:</u> Paragraph 114 of the NPPF states; 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; <u>Issue type:</u> Compliance with NPPF <u>Issue:</u> The Plan uses the term ‘landscaping’ where it needs to use the word green infrastructure. There is no reference to ‘landscaping’ in the NPPF. <u>Solution:</u> Do a search and replace ‘green infrastructure’ for ‘landscaping’	No change proposed. Whilst 'green infrastructure' may be a term that is used in the NPPF, landscaping is a term which is clearly understood within the planning process. The context within which it is used in the policies is clearly understood.
Natural England	Policy EN9	<u>Policy:</u> EN9: Provision of open space <u>Legislation/Plan reference:</u> Paragraph 114 of the NPPF <u>Issue type:</u> Effectiveness <u>Issue:</u> The NPPF requires that local plans positively plan for connected green infrastructure. It is essential that green infrastructure is considered appropriately at the beginning of the development planning process (along with the grey infrastructure) to ensure the GI on site is connected to the neighbouring sites. "Where possible" allows for argument of location. <u>Solution:</u> Remove "where possible"	No change proposed. The Green Network is not always in proximity to development sites, and linking into it will not therefore always be possible.

SGN and Danescroft	Policy EN9	EN9: Provision of Open Space – It is not clear whether the policy as currently drafted specifically requires on-site provision for residential developments of over 50 dwellings, or whether it will be considered appropriate in some circumstances to make a contribution towards off-site provision/improvements. This may be more suitable on some sites in the Central Area for instance, where existing site constraints and limited developable areas etc. may prevent satisfactory provision of children’s play areas and neighbourhood parks. It may be that the policy is drafted this way to provide flexibility for this exact reason, however if that is the case this should be set out more explicitly to avoid confusion. Further clarification is therefore required to ensure it is applied consistently for development management purposes. Without further clarification draft Policy EN9 is not currently effective and is therefore unsound.	No change proposed. The policy does not specify on-site provision, as it will not always be possible, particular in higher density sites.
Sport England	Policy EN9	EN9: Provision of Open Space – Sport England continues to be concerned that it appears from recent planning application consultations that for some housing schemes, limited monies from new development in the Borough are being directed towards new sports and leisure facilities and the improvement of the open spaces (including playing fields) that will serve these developments. Sport England would like to see more allocations for sport and leisure facilities to be included within the development plan to support growth. The work on the playing pitches strategy will help with this.	No change proposed. Sports and leisure provision is covered by the Community Infrastructure Levy, and must compete with a variety of other potential sources of CIL funding. At this stage, relatively small amounts of CIL (which was introduced in Reading in 2015) have been collected and spent. The Local Plan does not seek to allocate CIL monies.
Sport England	Figure 4.3	Figure 4.3 – Whilst this list is admirable, it does not address paragraph 73 of the NPPF, which clearly states that provision for sport and recreation should be based on sound local assessment. Neither the NPPF or Sport England supports standards, therefore reference should be made that all new sport and recreation facilities which are to be provided are based on up-to- date robust assessments.	Agreed. Change proposed. The supporting text should indicate that the figure should be considered in the context of up to date local assessments in line with the NPPF.
Sport England	Policy EN10	EN10: Access to open space – Sport England continues to support the Council’s intention to ensure that new developments have access to open space for physical activity.	Noted. No change needed.

Berkshire Gardens Trust	Policy EN11	<p>We do not find this policy to be sound. Our concerns relate to the absence of comprehensive and explicit references to historic designated landscapes with either a national designation or local value, which are afforded protection by the NPPF.</p> <p>EN11, Waterspaces – The first paragraph of this policy should contain a reference to the ‘historical value’ of these spaces, which often relate to much earlier designed landscapes associated with (for example) old private estates.</p>	Agreed. Change proposed. The policy should also refer to heritage.
Environment Agency	Policy EN11	We were pleased to see that the majority of our suggested amendments in the nature conservation and river corridors section of our letter dated 30 June 2017 in response to the Draft Reading Borough Local Plan Regulation 18 consultation have been incorporated into the pre-submission document.	Noted. No change needed.
Environment Agency	Policy EN11	An additional bullet point should be included in this policy: “Planning permission will only be granted for development proposals which would not have an adverse impact on the functions and setting of any watercourse and its associated corridor.”	No change proposed. This text is already largely included within the first paragraph of the policy.
Environment Agency	Policy EN11	<p>Some of our suggested amendments were only partially included and therefore we would like to explain the reasons why we require stronger wording for two points in particular:</p> <ul style="list-style-type: none"> - The 10m wide undeveloped ecological buffer zone between a new development and any watercourse should be measured from the top of the river bank and not the water’s edge (as if often assumed), as the latter could be considerably smaller. Wording that included the top of the bank was included in site allocation CR14m on pg. 161, but not elsewhere. - The word watercourses should be used instead of waterways as the latter suggests a navigable river, whereas all watercourses should be included, whether navigable or not. 	Agreed. Change proposed. These references should be updated to refer to the top of the bank and change waterways to watercourses.
Historic England	Policy EN11	Policy EN11 - Historic England welcomes and supports Policy EN11 Watercourses as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic	Noted. No change needed.

		environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	
Reading Climate Change Partnership (RCCP)	Policy EN11	EN11 – We welcome the recognition of the importance of Reading’s waterways to its overall character and the proposed steps to protect and enhance these areas.	Noted. No change needed.
SGN and Danescroft	Policy EN11	EN11: Waterspaces - The amendments that have been made to draft Policy EN11 following our previous representations are welcomed and supported. As highlighted in our response to draft Policy CR13(d) however, it is not clear how the requirement that development “be set at least ten metres back from the watercourse wherever practicable and appropriate to protect its biodiversity significance” (our emphasis) has been justified. There is no reference within the evidence base of the Pre-Submission Local Plan as to how a figure of 10 metres has been arrived at in determining what an appropriate set back from the watercourse should be in order to protect its biodiversity significance. This requirement is therefore currently unjustified and consequently the policy is unsound.	No change proposed. The 10 metre requirement has been strongly advocated by the Environment Agency (see EA comments on EN11 and elsewhere) as being a minimum distance to ensure the biodiversity value of the river bank.
Sport England	Policy EN11	EN11: Waterspaces – Sport England support this policy as watercourses play an important role in allowing informal recreation and sport to take place.	Noted. No change needed.
University of Reading	Policy EN11	Policy EN11: The University consider this Policy sound.	Noted. No change needed.
Environment Agency	Paragraph 4.2.45	4.2.45 – With regard to the last sentence, we agree that paths alongside watercourses do provide an opportunity to enhance the network of green links and corridors across the Borough, but would stress that this paragraph should include ecological enhancement such as the 10 m ecological buffer zones measured from the top of the river bank.	No change proposed. There is no need to repeat elements of the plan throughout the document, as this will make the document unnecessarily lengthy and repetitive.
Environment Agency	Paragraph 4.2.47	While we support this ethos, we would still expect there to be a 10m undeveloped buffer zone measured from the bank top, which could of course be used for informal recreation. Ecological enhancements to watercourses in the borough does not conflict with contributing ‘...to	No change proposed. This is general wording about the various roles of the watercourses. Reference to a 10m buffer is already referred to elsewhere in the policy and supporting text.

		the creation of attractive...waterside environments...' as native planning can create both an attractive and safe environment.	
Environment Agency	Paragraph 4.2.48	4.2.48 – We are pleased to see this supporting text takes into consideration the possibility of opening up and naturalising culverts where possible.	Noted. No change needed.
Environment Agency	Paragraph 4.2.48	4.2.48 – The mention of the two main rivers, Holy Brook and 'other small tributaries within Reading...' suggest that only the town centre is being considered. Please can it be made clearer that here are a number of additional watercourses within Reading Borough and that all are important ecologically?	Agreed. Change proposed. Reference to Reading Borough can be added.
Environment Agency	Paragraph 4.2.50	4.2.50 – Please add that the undeveloped buffer zone should be a minimum of 10m wide measured from the top of the river bank.	Agreed. Change proposed. Adding this reference would reflect the policy.
Environment Agency	Paragraph 4.2.52	4.2.52 – With regard to the Thames Parks Plan, more could be done to enhance the ecological value of parks that are adjacent to watercourses. There are major opportunities to do this in these areas which are not currently being realised. The supporting paragraph should be added as follows: 'Watercourses that are adjacent to parks will be enhanced for the benefit of wildlife and people.'	Agreed. Change proposed. These opportunities to enhance watercourses adjacent to parks can be referred to.
Environment Agency	Paragraph 4.2.53	4.2.53 – Due to recent changes in EA permitting, please could you replace the following sentence: "In addition, the EA will also consider proposals affecting watercourses under separate legislation. Development within 8 metres of the riverbank will require the prior consent of the EA under the Thames Region Land Drainage Byelaws" with the following, "The Environment Agency must be consulted for any proposals affecting watercourses under separate legislation. Developments within 8 metres of the top of a river bank of a main river is likely to require the prior consent of the EA under the Environmental Permitting Regulations, 2016.' The link to environmental permits is: https://www.gov.uk/topic/environmental-management/environmental-permits	Agreed. Change proposed. The text should be updated.
BBOWT	Policy EN12	We are broadly supportive of this policy, including the additional text added since the last consultation. However, we consider that the use of the caveats "where possible" and "where practicable" in relation to	Agreed. Change proposed. The amendments proposed can help to clarify the operation of the policy.

		<p>enhancing biodiversity interest features and integrating them into development proposals respectively, significantly weakens the policy and limits the ability of the Council to request these elements. We suggest amendments stating “wherever possible” and “wherever practicable.” This will make the policy consistent with the NPPF. Whilst this is a late stage in the Local Plan process, we also consider that this policy and its supporting paragraphs lack sufficient detail on the information required to support planning proposals. We therefore consider that the Local Plan would be well served by a supporting Biodiversity SPD and direct the Council to the following good examples: Lichfield biodiversity SPD and Aylesbury Policy NE2. We have the following comments on the supporting text:</p> <ul style="list-style-type: none"> • 4.2.56 – The following text is incorrect; “Biodiversity Opportunity Areas: these are <u>those LNRs</u> identified...” Biodiversity Opportunity Areas are not LNRs. They are focus areas identifying where resources for nature conservation can be most efficiently targeted. We propose the text should read “these are focus areas identified ...” • 4.2.62 – We consider the inclusion of the word “significant” is misleading and should be removed, as in “Proposals should... enhance the quality and integrity of sites (where appropriate), by maximising the inclusion of significant biodiversity and nature conservation features ...” This is because many biodiversity features of significant value to nature conservation are not significant features as such. 	
Environment Agency	Policy EN12	EN12: Please replace the last sentence of part b) ‘it should not replace existing alternative habitats, and should be provided prior to development.’ with: ‘The compensatory habitat should be the same habitat type that will be lost to the development and should be established prior to development.’	No change proposed. There is reference in the supporting text to formal measures and metrics for understanding biodiversity offsetting, and it is more appropriate that this is considered through this process.
Natural England	Policy EN12	<u>Policy</u> : EN12 – Biodiversity and the Green Network <u>Legislation/Plan reference</u> : Paragraph 109 of the NPPF states; “The planning system should contribute to and enhance the natural and local	No change proposed. It is our understanding that the current metrics, particularly the DEFRA metric, relate to biodiversity offsetting. There is

		<p>environment by: ...minimising impacts on biodiversity and providing net gains in biodiversity where possible”.</p> <p><u>Issue type:</u> Compliance with NPPF</p> <p><u>Issue:</u> Development must demonstrate a net gain in biodiversity in line with the NPPF. This should be demonstrated through a recognised metric such as the DEFRA metric.</p> <p><u>Solution:</u> Change the wording; All development will provide a measure of biodiversity loss/gain and it shall be calculated in accordance with nationally or locally recognised guidance and metrics.</p>	<p>already reference in paragraph 4.2.63 that refers to standards for biodiversity management where offsetting is not proposed.</p>
Rowe, Dr Simon	Policy EN12	<p>Biodiversity/Green Links: Many large developments like office blocks and flats have area of plants, both trees and ‘ground covering’ shrubs. Yet rarely are any of these ground cover species flowering. If they were, this would give a welcome source of food to insects and birds and increase the bio-diversity of the city, and decrease its negative impact. Can the document be amended to suggest this?</p>	<p>No change proposed. The type of landscaping required in various schemes will need to be considered on a case-by-case basis, depending on the contribution that they can make to biodiversity, the appearance of the site, and the management arrangements.</p>
SGN and Danescroft	Policy EN12	<p>EN12: Biodiversity and the Green Network – The following minor amendments are recommended to ensure it provides sufficient flexibility and to recognise that some developments may offer opportunities to positively affect the identified Green Network: “Permission will not be granted for development that <u>negatively</u> affects the sites [...] link into the existing Green Network and contribute to its consolidation <u>wherever practicable</u>. [...] It should not replace existing alternative habitats, and should be provided prior to <u>occupation of new</u> development.</p>	<p>Partly agreed. Change proposed. It is agreed that the word 'negatively' clarifies the position. However, it is not agreed that replacement of habitats should be prior to occupation, as it is development rather than occupation that most significantly affects the habitats.</p>
Day, Stephen	Policy EN13	<p>I do not consider the Local Plan to be sound. From the map of page A, it appears that part of our garden at the bottom has been designated a “Major Landscape Feature (EN13)” and is shown with a black border between our house (number 164) and garden. We bought the house (and garden) 12 years ago. The area you have shown in blue consists of lawn, trees under a TPO, shrubs and flowers, as can be found in many other gardens. There is no border or delineation between the house and garden. Looking at the map as a whole, I cannot find another example of a resident’s garden being designated a “Major Landscape Feature,” nor</p>	<p>No change proposed.</p> <p>The black border shown is part of the Ordnance Survey base map and it is not possible for the Council to change this.</p> <p>With respect to the definition of the site as part of the Major Landscape Feature, this differs from other gardens in that it is very large, has</p>

		can I understand why a private garden should be so. Therefore, I believe this designation is unsound.	significant tree cover and visually meshes into the wider landscape beyond. The Local Plan Background Paper goes into more detail on how the areas have been defined. It is not unusual for land in private ownership to be part of a major landscape feature – see for example much of The Warren – and nor does it preclude building. Development may take place within these areas as long as their landscape value is preserved.
Gladman Developments	Policy EN13	Policy EN13- unsound (Positively prepared, justified, consistent with National policy). Any landscape policies should be consistent with Section 11 of the NPPF. In this regard, ‘Major Landscape Feature’ is not a designation that is defined within national planning policy. Local landscape designations must also be fully justified through a proportionate evidence base. Paragraph 113 of the NPPF refers to the need for criteria-based policies in relation to proposals affecting protected wildlife or geodiversity sites or landscape areas, and that protection should be commensurate with status and give appropriate weight to their importance. As currently drafted, Gladman do not believe this landscape policy aligns with the provision set out within the Framework. We wish to point out that impact on the landscape is one factor that should be considered by the decision maker when determining any planning proposal and ultimately it is a balance of the harm of development against the benefits. It is only here the harm significantly and demonstrably outweighs the benefits that planning permission should be refused. Gladman also note that the policy confirms that none of Reading Borough lies within an area defined as AONB.	No change proposed. The justification for policy EN13 is set out in the Local Plan Background Paper. This demonstrates the importance of these landscapes and how it conforms to national planning policy. It is of course the case that landscape is one consideration, but it is also the case that the major landscape feature designation is not a blanket prevention of development. Development may take place within these areas as long as their landscape value is preserved.
Historic England	Policy EN13	Policy EN13 - Historic England welcomes and supports Policy EN13 for the protection it affords to the North Wessex Downs and Chilterns AONBs in accordance with the National Planning Policy Framework.	Noted. No change needed.
Natural England	Policy EN13	Policy: EN13 – Major landscape features and Areas of Outstanding Natural Beauty	Agreed. Change proposed. Reference to LVIA should be added.

		<p>Legislation/Plan reference: Paragraph 115 of the NPPF states, ‘Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty’.</p> <p>Issue type: Effectiveness</p> <p>Issue: We support NE13 but would like to add a reference to the best practice methodology to ensure its effectiveness at delivering the supported outcomes through the development planning process.</p> <p>A requirement for an LVIA in line with the Guidelines for Landscape and Visual Impact Assessment (V3) May 2013 (or as replaced).</p> <p>Solution: Thoroughly consider any comments made by the AONB boards.</p>	
BBOWT	Policy EN14	<p>BBOWT is generally supportive of this policy, however we note that it contains no reference to ancient woodland or veteran trees, which are irreplaceable habitats. Paragraph 4.2.67 does mention the presence of two ancient woodlands within the Borough, but there is no reference to these being irreplaceable habitats, (which receive specific mention within the NPPF and require special consideration of development impacts, such as the provision of semi-natural habitat buffers). Nor is there any mention of veteran trees, of which there are a number currently recorded in the Borough (http://www.ancient-tree-hunt.org.uk/discoveries/interactivemap), and which also require special consideration. We propose the text of the policy is amended to include the following text: “Ancient woodlands and veteran trees are irreplaceable and will be protected. Proposals likely to cause harm to ancient woodland or veteran trees will be refused. Developers will be required to provide habitat buffers around areas of ancient woodland or veteran trees to and should provide additional planning where appropriate to do so.” This will make the policy consistent with the NPPF paragraph 118 (point 5). We also propose the minor amendment to the text of policy EN14 from “The quality of waterside vegetation will be maintain or enhanced” to “The quality of waterside vegetation will be</p>	<p>Partly agreed. Change proposed. This should be recognised, but it is considered that the policy already offers the protection necessary. The supporting text should clarify the importance of ancient woodland and veteran trees. In terms of genetic provenance, a fuller biosecurity requirement is required to address this issue, and should be added.</p>

		<p>maintained and enhanced” as it is not practically possible, or indeed desired, to enhance the quality of vegetation that is not also being adequately maintained. Comments on supporting text:</p> <ul style="list-style-type: none"> • 4.2.67 - The paragraph refers to ancient woodlands within the Borough, but does not also state that they are deemed irreplaceable habitats, as defined by the NPPF, and fails to mention veteran trees. We recommend the following sentence be included: “Ancient woodlands and veteran and ancient trees are irreplaceable. Permission is likely to be refused for development that would lead to the loss of harm of ancient woodland or veteran and ancient trees. There are two ancient woodlands in Reading and many veteran and ancient trees.” • 4.2.68 – We recommend the addition of the following minor amendment to reflect good ecological practice “...climate conditions (native species of local genetic provenance is possible and where appropriate...” 	
Cowling, Tony	Policy EN14	EN14—Trees need to be managed, safe, replaced, generally looked after. The policy should make reference to these aspects.	No change proposed. Policy EN14 ensures that trees are appropriately managed.
K2 Developments	Policy EN14	EN14: Trees and Hedges and Woodlands – We consider that tree coverage should be referenced as ‘improve the level of tree coverage, where appropriate,’ given some sites are tightly constrained and such improvements will be limited.	No change proposed. Increasing the level of tree cover is a key policy aim for the Council, and should not be diluted. The policy already indicates that planting may be off-site in appropriate circumstances.
Natural England	Policy EN14	<u>Policy:</u> EN14: Trees, hedges and woodlands <u>Legislation/Plan reference:</u> Paragraph 118 states; When determining planning applications, local planning authorities should 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: And Paragraph 109 of the NPPF, And Paragraph 117 states ‘To minimise impacts on biodiversity and geodiversity, planning policies should:	Partly agreed. Change proposed. Ancient woodland should be recognised, but it is considered that the policy already offers the protection necessary. The supporting text should clarify the importance of ancient woodland.

		<p>promote the preservation, restoration and re-creation of priority habitats’.</p> <p><u>Issue type:</u> Compliance with NPPF, Effectiveness</p> <p><u>Issue:</u> There is no policy for Ancient Woodland. It would appear to fit here.</p> <p><u>Solution:</u> Policy wording recommendation; Development proposals that would lead to an individual or cumulative significant adverse impact on irreplaceable habitats such as ancient woodland or ancient trees the Council will refuse unless exceptional circumstances can be demonstrated and that the impacts to the site are clearly outweighed by the benefits of the development. Sufficient information must be provided for the Council to assess the significance of the impact against the importance of the irreplaceable habitat and the species which depend upon it. This will include the buffer area around the tree or woodland. Natural England advise 15m for ground works (root disturbance) and 50m for pollution and ground compaction. Planning permission will be granted only where: a. the benefits of the development at this site clearly outweigh any adverse impacts on the irreplaceable habitat and the ecosystem services it provides b. development has followed a mitigation hierarchy of avoid, then mitigate if avoidance cannot be achieved – then compensate/offset if mitigation cannot be achieved. Avoidance will require the applicant to demonstrate that the development could not be located in an alternative, less harmful location</p>	
Reading Urban Wildlife Group	Policy EN14	<p>Policy EN14, para 4.2.71</p> <p>Soundness: Whilst in full support for the objectives of this policy, RUWG does not think that it protects existing trees sufficiently during the development period. The town is highly developed and new construction/refurbishments will take place in restricted areas, making it far more difficult to retain trees and hedges on the site without the actions of construction creating damage. The policy and supporting text should reference BS 5837: 2012 : Trees in Relation to Design, Demolition and Construction as the minimum require standard for all</p>	<p>No change proposed. The policy makes clear statements about the importance of protection of trees, and this will apply equally during the development period. The supporting text was amended at Pre-Submission stage to provide additional wording on the protection of trees during construction. It is not considered necessary to reference a specific standard that may change. Production of a SPD is possible, but</p>

		developments. This should be added to para 4.2.71. We also think that there should be a commitment to a supplementary planning document covering the protection of trees and hedges during construction. This would translate the sections of BS 5837 referring to the construction phase into easily accessible language that all parties can understand easily.	it is not currently proposed.
Robson, Elaine	Policy EN14	Existing assets will be protected and Reading's tree cover will be extended, while at the same time preparing for climate change. The Council's ongoing tree strategy is robust and far-sighted but not focussed on mitigating air pollution.	No change proposed. The Tree Strategy recognises the multiple benefits of trees, and this includes improving air quality.
Rowe, Dr Simon	Policy EN14	Also, could thought be given to getting a balance between trees and bare paving areas? The recent development of Vastern Road and the Station approaches took away many trees planted in the paved areas and did not replace them. Some encouragement to provide the solution recently adopted in the Caversham Precinct, where trees have been inserted in such a way as to require less future maintenance? The more trees you have in your urban environment, the more reduced water runoff and CO ₂ emission benefits could be achieved, though I realise that trees can bring their own issues.	No change proposed. The Council wishes to increase the tree cover of the Borough, and will seek opportunities to do that wherever possible. Policy EN14 should help to achieve this aim.
University of Reading	Policy EN14	Policy EN14: The University consider this Policy would not be fully justified and therefore unsound. Changes are recommended. The University repeats its support for the inclusion of Policy EN14 but would again recommend an improvement to the second paragraph (as previously suggested but not amended) as stated below: "New development shall make provision, <u>where appropriate and justified</u> , for tree planting within the application site..." As drafted, the policy would require all new development, regardless of the type of development or the quality of trees in place, to make provision for such trees. This would not be justified or consistent with national policy and would be unsound. The University suggests the Council include the phrasing "where appropriate and justified" to make the draft policy sound and enable the assessment for the requirements of this policy on each sites / proposal's individual merits.	No change proposed. The policy statement is strongly that all development will make provision for tree planting, to achieve the important aims already set out. Where this is not possible on-site, off-site planting will be appropriate. This change would water the policy approach down.

Natural England	Policy EN15	<p><u>Policy:</u> EN15 – Air quality</p> <p><u>Legislation/Plan reference:</u> Paragraph 117 states – ‘To minimise impacts on biodiversity and geodiversity, planning policies should: promote the preservation, restoration and re-creation of priority habitats’.</p> <p><u>Issue type:</u> Compliance with NPPF</p> <p><u>Issue:</u> Effectiveness, Lack of reference to potential impacts of air pollution on priority habitats.</p> <p><u>Solution:</u> This policy may be considered more closely in line with Paragraph 117 of the NPPF by including an additional consideration relating to the potential air pollution-related impacts of development within 200m of priority habitat such as deciduous woodland.</p>	Partly agreed. Change proposed. This is already covered to an extent by the second bullet point of paragraph 4.2.81, but it can be expanded to make this clear.
Reading Climate Change Partnership (RCCP)	Policy EN15	EN15 – In 4.2.77 regarding air quality, the absence of specific UK guidelines for PM2.5 exposure could be addressed by reference to current WHO guidelines.	Agreed. Change proposed. Reference can be made to World Health Organisation guidelines.
Robson, Elaine	Policy EN15	<p>I wish to suggest an additional subheading within pp 56-58 to specify that the Council endorses the mitigation of air pollution by the use of local green infrastructure. The term Green Infrastructure is used here to include trees, shrubs, hedges, grass, areas of cultivated or wild plants, also green walls, balconies and roofs. These contribute to a healthier environment by absorbing aerial pollutants.</p> <p>The Council’s strategy for control of air pollution is to reduce it at source, and to monitor readings especially of NO2, PM10 and PM2.5. But it is common experience that in some circumstances the air in certain areas of Reading is still not good (e.g., Caversham Road below the rail station on 20th January). I would urge the Council’s Planners and Highway specialists to evolve a practical policy to mitigate air pollution with porous green infrastructure whenever possible. Modern city buildings or blocks of flats should use flat rooftops, balconies and green walls to improve the air quality and trap particulates. A positive statement in the New Plan is needed to ensure that future Planning Applications pay attention to Green Infrastructure. Two supporting publications are attached, also of interest to local road developers.</p>	No change proposed. Provision of green infrastructure can help to mitigate reductions in air quality, and mitigation is required by the policy, and supporting text in 4.2.80 references landscaping and green walls. However, the focus of the policy is considered to correctly be addressing this issue at source.

		I have not included draft text for my suggested brief addition to EN15, but could attempt this if time permitted. The sources I have quoted show that the use of green infrastructure to mitigate air pollution should be included in relevant planning applications and feature in the future development of Reading. Measures to deal with climate change, to maintain parks and trees and to improve biodiversity will not by themselves achieve the required focus.	
Rowe, Dr Simon	Policy EN15	Transport: Where a development has a substantial air quality impact, can the developer be required to fund a certain number of trees? RBC could supply a list of many sites that need more tree planting?	No change proposed. Policy EN15 on air quality ensures that, where a development would detrimentally affect air quality, those effects should be mitigated. This could include tree planting or other green infrastructure. Tree planting is an expectation of development in any case under EN14
Reading Friends of the Earth	Paragraph 4.2.77	Soundness: This is not sound because, while it references a national goal to reduce PM2.5 exposure by a percentage, and points out that there is no safe level, it does not reference guidelines for absolute levels of exposure. Modification: Include reference to WHO guide level for annual exposure to PM2.5	Agreed. Change proposed. Reference can be made to World Health Organisation guidelines.
Reading Urban Wildlife Group	Paragraph 4.2.77	Paragraph 4.2.77 Soundness: the document acknowledges that there is no safe level for PM2.5 and refers to a national goal to reduce PM2.5 exposure by 15%, but it does not give an absolute target. Modification: Refer to WHO guidance levels for annual exposure to PM2.5	Agreed. Change proposed. Reference can be made to World Health Organisation guidelines.
Reading Friends of the Earth	Paragraph 4.2.81	Soundness: This is not sound because in the context of both air quality and congestion 100 extra car parking spaces per development may well prove excessive ... especially if many of them were to be used by peak hour traffic ... because congestion has a non-linear response to traffic density, and air quality probably has a non-linear response to congestion and traffic density. Note that the proposed East Reading Park and Ride has only 277 spaces. All development within the AQMA should be	No change proposed. It is considered this it would be unreasonable to expect an air quality assessment for any development including parking. Other bullet points in this paragraph will pick up most developments that would lead to a material decrease in air quality.

		subject to an Air Quality Assessment if parking for motor vehicles is to be provided. Modification: Modify second bullet point to read as follows: "Would include parking for motor vehicles."	
Reading Urban Wildlife Group	Paragraph 4.2.84	Paragraph 4.2.84 Soundness: It is reasonable to expect some reduction in air quality in areas of Reading due to new development with mitigation elsewhere, but the Plan should make it clear that mitigation elsewhere cannot be used for reductions in air quality that take an area below Air Quality Objective levels. Modification: add this proviso to the first sentence.	No change proposed. This is covered by the third bullet point in clause i of the policy, as a worsening below air quality objective levels will detrimentally affect health.
Environment Agency	Policy EN16	We recommend adding to the first paragraph of policy EN16, the following: 'Developers will be expected to demonstrate that they have consulted with sewer undertaker regarding available capacity within the receiving network to accommodate effluent flows. A Drainage Strategy should be provided to ensure there are clear plans for the disposal of surface and effluent flows from the site.'	No change proposed. The suggested wording is more appropriate for supporting text rather than policy, as it sets out how a policy will be achieved. However, in this case, there is already wording in the supporting text at 4.2.91 that relates to liaison with the sewerage undertaker. A Drainage Strategy is an additional requirement, and it is not clear what this will add to existing requirements.
Environment Agency	Policy EN16	We still consider that Policy EN16 should include the need for dealing with unsuspected contamination. This is particularly important when there is no contaminative previous use stipulated on an application form due to the site having changed from a previously contaminative (industrial) to a current non-contaminative use such as an office block or car park.	No change proposed. Policies should be capable of implementation. Should unsuspected contamination arise after the application stage, the Council will not be able to control this through planning powers.
Natural England	Policy EN16	<u>Policy:</u> EN16: Pollution and water resources <u>Legislation/Plan reference:</u> Paragraph 109 of the NPPF and Paragraph 114 of the NPPF states; 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; <u>Issue type:</u> Compliance with NPPF, Effectiveness <u>Issue:</u> This policy omits some key issues and its requirements should be clarified. It omits detail on development next to sensitive habitat. It	No change proposed. The submission suggests substantial changes to the policy and it is not entirely clear what these would achieve. The main change seems to be a great deal of detail on lighting, which is not considered appropriate for an overarching policy. An equivalent policy to EN16 has been operated in Reading for some time, and there has not been confusion over its contents that would require a rewrite.

		<p>would also be advisable to sub heading this policy to make the content clearer or make separate policies for water resources, and pollution, with subheadings for land, light, noise, other. We recommend you consult the Aylesbury Vale Reg 19 version of their Plan. The plan includes good examples of all environmental and green infrastructure policies (although this is yet to be approved by the inspector).</p> <p><u>Solution:</u> Consider rewording; Development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution, including no deterioration in, or ideally enhancement of, ground and surface water quality.</p> <p>Water resources * highlight areas of known pollution, provide some words from the text to explain what the requirements for developers is exactly* Adequate water resources, sewerage and wastewater treatment infrastructure will be in place to support any proposed development prior to occupation. Land Development will need to provide an assessment to determine the existence or otherwise of contamination, its nature and extent, the risks it may pose and to whom/what (the 'receptors') so that these risks can be assessed and satisfactorily reduced to an acceptable level through mitigation. Assessment should also identify the potential sources, pathways and receptors ('pollutant linkages') and evaluate the risks. Noise and light - Proposals for development that are sensitive to the effects of noise or light pollution will only be permitted in areas where they will not be subject to high levels of such pollution, unless adequate mitigation measures are provided to minimise the impact of such pollution. Developments where external lighting is required, planning permission will only be granted where all of the following criteria are met:</p> <p>a. The lighting scheme proposed is the minimum required for the security and to achieve working activities which are safe, b. Light spill and potential glare and the impact on the night sky is minimised through the control of light direction and levels, particularly in residential and</p>	
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		commercial areas, areas of wildlife interest or the visual character of historic buildings and rural landscape character, c. The choice and positioning of the light fittings, columns and cables minimise their daytime appearance and impact on the streetscape, and d. In considering development involving potentially adverse lighting impacts to wildlife, the Council will expect surveys to identify wildlife corridors and ensure that these corridors are protected, and enhanced where possible. Development that will result in noise pollution should consider both human and wildlife sensitive receptors and provide an impact assessment as part of the development application.	
Robson, Elaine	Policy EN16	<p>This section is not immediately relevant to Air Quality. Other Documents from Reading Borough Council - RBC Air Quality Action Plan (Update 2016)</p> <ul style="list-style-type: none"> • p 14: the last entry tabulated mentions 10% increase in numbers of trees and plants (2010) by 2030, to help absorb pollution (also re mental health, climate change). Action via Planning and Parks. <p>RBC Air Quality Annual Status Reports for 2016 and 2017 - The opportunity to read these reports has been very helpful, and if anything they support my suggestion. The Lancet Commission on Pollution and Health (2017) - In view of the long-term detrimental effects of air pollution on disease and mortality I attach a pdf of this recent review in case it is of interest.</p>	Noted. No change needed. Air quality is dealt with in policy EN15.
Thames Water	Policy EN16	EN16: Pollution and Water Resources - Thames Water would like to support Policy EN16 and its supporting text. Following our comments made to the draft Local Plan in June 2017, we are pleased to see the additional supporting text at paragraph 4.2.91.	Noted. No change needed.
Environment Agency	Paragraph 4.2.91	We strongly agree with 4.2.91.	Noted. No change needed
Bracknell Forest Council	Policy EN17	Bracknell Forest Council has no comments to make on new policy EN17 (noise generating equipment)	Noted. No change needed.
University of Reading	Policy EN17	Policy EN17: The University consider this Policy would not be fully justified and therefore unsound. Whilst the University supports the	No change proposed. The background and justification to this policy are set out in the Local

		protection of general amenities, including from the potential impact generated by noise pollution, there appears to be no justification, as required by paragraph 182 of the NPPF, for noise generated from equipment to be “at least 10dBA below the existing background level”. Background noise by its nature sets the baseline against which noise would become audible and impacts are assessed against that baseline. The University therefore considers noise impact should be assessed against background noise with background noise setting the maximum level proposed noise generating equipment should be permitted to reach. This draft policy unjustified and unsound as drafted.	Plan Background Paper. The reason for setting it at below the existing background level is to prevent ‘background creep’, i.e. an incremental increase in noise each time new plant is introduced. This has been the practice within the Council’s Environmental Protection for some time, but this policy places greater weight upon it.
BBOWT	Policy EN18	BBOWT is supportive of this policy, particularly with regard to the emphasis on requiring sustainable drainage systems that maximise ecological benefits.	Noted. No change needed.
Cowling, Tony	Policy EN18	EN18—SUDS. I do not see that these systems can help in times of severe heavy rainfall as they fill up and then offer no further protection.	No change proposed. SUDS are a legal requirement for major development.
Environment Agency	Policy EN18	EN18: We are pleased to see that the Council have taken our recommendations given at draft consultation stage on board.	Noted. No change needed
Reading Climate Change Partnership (RCCP)	Policy EN18	EN18 – We support the proposal for all major developments to incorporate SuDS, but would like to see this extended to smaller schemes too where these are in proximity to flood risk areas. Further, in point 4.2.100, we would like to see consideration given to incorporation of SuDS in any redevelopment where practical.	No change proposed. The policy encourages the use of SuDS on minor schemes, but unlike major schemes there is no legal requirement to incorporate them. As most sites within Reading are redevelopment sites, the SuDS policies will apply equally to them.
SGN and Danescroft	Policy EN18	EN18: Flooding and Drainage - In our previous representations on the Draft Local Plan (June 2017), we queried whether the Council had already prepared a Sequential and/or Exceptions Test to inform the Draft Local Plan, in accordance with the NPPF. The Pre-Submission Local Plan now confirms at paragraph 4.2.98 that these have “already been carried out for those sites allocated within this plan, and there is no need for this to be repeated unless development would differ from the allocation.” Footnote 64 indicates that the sequential and exceptions test is “Available on the Council’s website”; however at the time of writing we have not been able to locate this to review it as part these	Agreed. Change proposed. This wording would better reflect application of national policy.

		<p>representations. It is essential however that this be submitted as part of the supporting evidence base for the new Local Plan when it is submitted for examination, to ensure the proposed allocations can be found sound. It should also be clarified as to what is meant by the reference in supporting paragraph 4.2.98 that "...there is no need for this to be repeated unless development would differ from the allocation". There would only be a need for the sequential and/or exception test to be repeated if the proposed use (and/or flood risk vulnerability classification) of an allocated site differs from that for which it is allocated, rather than, for instance, the scale of development being higher than the indicative capacity for the relevant allocation. We therefore suggest this sentence is amended to: "...there is no need for this to be repeated unless the <u>proposed use and/or flood risk vulnerability classification</u> development would differ from the allocation"</p>	
Thames Water	Policy EN18	<p>EN18: Flooding and Sustainable Drainage Systems - We would like to support policy EN18 and its requirement for all major developments to incorporate SUDs in line with the Government's technical standards.</p>	Noted. No change needed.
Aviva Life and Pensions UK Ltd	Policy EM1	<p>EM1 – We note that the provision of office floorspace has increased from 53,000-119,000 sq. m of office floorspace since the previous consultation in June 2016. We do not consider this draft policy is beneficial and recommend its entire deletion. The objective of the planning system as set out by the in the NPPF is to stimulate economic development and not frustrate it. The concept that a developer proposing otherwise acceptable economic development may need to directly provide or fund provision of housing (including affordable housing) to mitigate the impacts of its economic development proposals, otherwise planning permission will not be granted, seems likely to negatively impact on the economic performance of UK Plc and run counter to national planning policy.</p>	<p>No change proposed. The amount of office floorspace planned for has decreased slightly since the May 2017 version, as evidenced through the new version of the Housing and Economic Land Availability Assessment. It is not agreed that the requirement to mitigate effects of employment development over the level planned for should be abandoned. The extent to which new employment development can put pressure on the housing market and exacerbate housing need is clear. Illustrative of this, the SHMA included an uplift in housing need as a result of economic growth. It is not sustainable for significant amounts of employment development to take place with no supporting</p>

			mitigation of housing impacts.
Bracknell Forest Council	Policy EM1	<p>Employment – It is noted that Policy EM1 aims to meet the Borough’s employment needs in full, and provides a contribution of 60,000 sq m of office floorspace to the wider Central Berkshire Functional Economic Market Area (FEMA). It is noted that this will need to be balanced against housing provision in the wider area. As previously stated, on the basis of the evidence currently available to this Council, it is unlikely that Bracknell Forest will be able to meet its needs for ‘B’ Class floorspace as set out in the Central Berkshire Economic Development needs Assessment. Our ‘Call for Sites’ exercises have resulted in minimal interest in new sites being promoted for employment development. Whilst we will be commissioning further studies to assess market conditions, consideration needs to be given to the future potential of our defined employment areas. It is considered that there will be a need to discuss the accommodation of some of our unmet needs with other Authorities in the Central Berkshire FEMA, including Reading Borough. The provision of contribution to the FEMA made through Policy EM1 is therefore welcomed.</p>	<p>Noted. No change needed. The Council will continue to discuss this matter with authorities within the Functional Economic Market Area, as it becomes clear what each authority within the FEMA can accommodate.</p>
Greater London Authority	Policy EM1	<p>Given Reading’s good access to the transport network, we support the draft Plan’s level of ambition in terms of employment including industry/warehousing/freight/logistics. We would welcome a conversation with the Council on collaboration opportunities regarding related wider land use requirements, where mutual benefits can be achieved.</p>	<p>Noted. No change needed. The Council is open to continued discussion on these matters.</p>
K2 Developments	Policy EM1	<p>EM1: Provision of Employment Development – We support the provision of additional employment floorspace within the Borough especially within Reading Town Centre in line with the objectives of the Framework.</p>	<p>Noted. No change needed.</p>
Mapletree Investments Pte	Policy EM1	<p>EM1: Provision of Employment Development – Whilst GPR supports the principles of this policy, they maintain their position that consideration be given to the role that supporting employment uses, such as hotel, serviced apartment, retail and leisure uses can play should also be acknowledged for their job creation benefits.</p>	<p>No change proposed. There may be scope for uses that support the economic role of the areas to be included as long as they do not result in a loss of employment land. This might include facilities for workers and visitors, such as retail,</p>

			childcare etc. Policy EM2 and supporting text were amended at Pre-Submission stage to cover this.
Slough Borough Council	Policy EM1	<p>Meeting Employment Needs - An Economic Development Needs Assessment (EDNA) for Central Berkshire was carried out in 2016, which identified the level of need for additional office and industrial or warehouse space between 2013 and 2036. The results of the EDNA showed that Reading needs to plan for between 2013 and 2036 52,775 of office floorspace; and 148,440 sq. m of industrial and warehouse floorspace. Slough Borough Council agree with the results of the 2016 EDNA , including that Reading falls within a different functional economic area (FEMA) to Slough; that Windsor and Maidenhead falls within both the Central and Eastern FEMAs; and Slough forms the Eastern FEMA with Windsor and Maidenhead .</p> <p>EM1: PROVISION OF EMPLOYMENT DEVELOPMENT - Provision will be made for an additional 53,000-112,000 sq. m of office floorspace and 148,000 sq. m of industrial and/or warehouse space in Reading Borough for the period 2013 to 2036. Policy EM1 identifies that Reading can accommodate its full employment needs. It is considered that Slough should support Reading’s commitment to meet its industrial and warehousing need in full, but notes that it will provide an additional supply of offices. Slough has no objection to this provided that this does not result in impacts on the Eastern FEMA.</p>	Noted. No change needed.
South Oxfordshire District Council	Policy EM1	Policy EM1: Provision of Employment Development – The Economic Development Needs Assessment for Central Berkshire (2016) identified a need for Reading to provide 52,775 sq. m of office floor space and 148,440 sq. m of industrial and warehouse floorspace over the plan period. The Pre-Submission Draft Reading Local Plan (Nov 2017) identifies appropriate locations to address this need within Reading Borough.	Noted. No change needed.
Wokingham Borough Council	Policy EM1	Provision of Employment – The Plan states that Reading can provide up to an additional 60,000 sq m of office floorspace which can be seen as	Noted. No change needed. Discussions around this issue will continue under the duty to co-

		<p>a contribution to the wider needs of the functional economic market area, e.g. should reduce the need for provision elsewhere such as in Wokingham Borough. The Plan guides major office developments (over 2,500 sq m) along the A33 corridor which is considered highly accessible with a new station planned at Green Park and mass rapid transit links. Development in this area will have potential for major traffic impact upon Wokingham Borough. Whilst the accessibility of the area is noted, Wokingham Borough Council will require ongoing discussions with Reading Borough to ensure impacts are adequately addressed. Wokingham Borough Council should also be consulted on any planning applications regarding development in this location.</p>	operate.
Highways England	Policy EM2	<p>EM2: Location of New Employment Development – Policy EM2 sets out the core locations for new employment sites. As sites EM2a, EM2b, EM2c, EM2d, EM2e and EM2f are located immediately to the north of the M4 at Junction 11 we would continue to wish to be consulted about any planned change and/or intensification of use beyond the existing site planning permissions.</p>	Noted. No change needed.
K2 Developments	Policy EM2	<p>EM2: Location of New Employment Development – We support this policy subject to comments made above.</p>	Noted. No change needed.
Mapletree Investments Pte	Policy EM2	<p>EM2: Location of New Employment Development – In relation to the location of new employment development, GPR maintains the view that specific reference made to the role new office development plays in Core Employment Areas. GPR request that the first sentence of the policy be reworded as follows (new words listed in red below): “Major office development will take place in the centre of Reading and in Core Employment Areas along the A33 corridor.” GPR are pleased to see the revised acknowledgement of the role non-employment uses play in supporting the area’s economic function in Core Employment Areas (paragraph 4.3.11) They would prefer, however, that the employment benefit of some non-employment uses, as well as their ability to expand on job generation, is better acknowledged and noted in this policy.</p>	<p>No change proposed. The proposed wording would have the effect of limiting office development to the CEAs, which is not the intention. There are sites outside the CEAs in the A33 corridor where major office may be appropriate, and indeed where such permissions have been granted. However, the supporting text should clarify that the A33 corridor includes some CEAs.</p> <p>The job role of some non-employment uses is accepted. However, the main purpose of the CEAs is to provide mainly industrial and warehouse land which supports the local</p>

			economy.
Mapletree Investments Pte	Policy EM2	EM2a: Location of New Development, the Role of Core Employment Areas – Reflective of the comments above, we welcome the change to Core Employment Areas policy and that it now includes recognition for ancillary uses to support business and employment areas. The benefits of having ancillary facilities, such as retail, hotel and restaurants on site, encourage a community feel and make these areas an attractive place to work as well as increasing sustainability by reducing trips off-site.	Noted. No change needed.
Robert Cort Properties Ltd	Policies EM2 and EM3	The representations relate to two neighbouring sites: (i) Robert Cort Industrial Estate, Britten Road, RG20AU and (ii) Preston Road Industrial Estate, Preston Road, RG2 and draft policies EM2 and EM3. Both of these sites are located within close proximity to each other and are allocated as Core Employment Area (policy EM2f). The sites measure approximately 3.4 ha in total and predominantly comprise light industrial uses with some leisure use. The sites are framed by further employment uses and residential dwellings to the north, a tree belt with open space and residential dwellings beyond to the east; and a mixture of residential and commercial uses to the west (across Elgar Road South) with further open space beyond. There are no listed buildings in the vicinity. The sites fall within Flood Zone 1. These sites are accessible and well connected with regular bus services to the town centre and situated 1.8 miles from Reading West rail station which provides frequent services to Reading, Basingstoke and Newbury and 2 miles from Reading Station. Our client's long term experience of owning and letting the sites means that they have identified a specific commercial constraint arising from the Preston Road sites location being on a hill which means that access for commercial vehicles is very tight at best. Furthermore the access road is not straight which introduces further constraints for HGV's (including a requirement for such vehicles to reverse downhill). In addition the loading bay doors for most of the units are off the steep incline which hampers their operation. These constraints cannot be addressed within the current configuration and limit the end use of the units. The Robert Cort Industrial Estate is close	<p>No change proposed.</p> <p>The Council has carried out an Employment Area Analysis, which provides background to the designation of the Elgar Road as a Core Employment Area. The conclusion is that the area still has importance for employment purposes. It is particularly significant for small and medium sized units.</p> <p>Nevertheless, the Council recognises that the CEA designation should have some degree of inherent flexibility should the alternative be a long-term vacant site. This is recognised through paragraphs 4.3.11 and 4.3.13.</p> <p>The representation seeks changes to EM2 to include text similar to 4.3.11. It is considered that this is already included within EM2, in the second sentence of the second paragraph.</p> <p>This representation also seeks the relaxation of EM3 to potentially allow for residential uses. Inclusion of residential is very different to non-employment commercial uses, in that it will</p>

		<p>to full occupancy, though there are some vacant units. Future renovation works to bring units to modern standards are likely to be costly. The longest lease ends in the next decade. The five units on Preston Road are almost at full occupation though demand for these units has been historically low. RBC’s response to earlier representations (“the site is almost fully occupied”) this does not reflect our longer term concerns about the potential reuse of these premises. We note that is necessary for the Local Plan to seek to balance development pressures, in particular housing and employment land, over the Local Plan period.</p> <p>HELAA – Sites KA014 and KA015 which roughly correlate with our ownership identified potential capacity for 466 residential dwellings. Further analysis identifies that the sites are suitable for development. The alleged unsuitability identified in terms of health and safety is due to potential noise issues from the surrounding industrial uses and a small amount of potential land contamination, both of which could be mitigated against as part of any development scheme. The remaining unsuitability factors relate to the loss of the existing employment use on the site. Overall, we do not consider that the evidence base has appropriately considered the scope for residential use on the site, despite considering that it is “suitable” against a number of the relevant criteria, as it has failed to consider mitigation which would address the concerns identified. This failure is exacerbated in a context where RBC acknowledge that “there is scope to accommodate the full level of need within Reading” but “there is a shortfall of 664 dwellings when considered against Reading’s need.” The emerging plan does not therefore appropriately balance employment and housing needs and policy flexibility to facilities residential development on our clients site would assist in meeting such a balance – as expanded upon below.</p> <p>Our clients recognise that whilst the premises have a number of constraints which have historically hindered their letting – even though they currently benefit from a reasonably high occupation level.</p>	<p>completely change the character of an area, bring residents into a location where they will be subject to poor residential amenity, potentially cause issues to existing operators in continuing or expanding their business due to potential complaints from new residents, and ultimately affect the viability of an employment area. It is not considered that this is appropriate.</p> <p>It is not agreed that the Council’s approach amounts to blanket protection. The approach has been to identify those areas which are of greatest value to the economy and ensure their future, against a background of a significant positive need for new provision, rather than simply setting out to protect all employment.</p>
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Thames	Policy EM2	EM2: Location of Employment Development – EM2 seeks to direct	No change proposed.

Properties Limited		<p>major employment uses to the A33 Corridor and Core Employment Areas. The policy does not define ‘major employment uses’ and further clarity would be welcomed in this regard, but does note that the policy includes industrial and storage distribution uses. Thames Properties welcome the reduced size of the allocation for Richfield Avenue CEA (EM2g) and the proposed release for housing on the eastern edge. We would, however, urge RBC to consider the suitability of the Richfield Avenue CEA for continued provision of ‘major employment’ uses, as originally intended under the CEA designation. It is clear why major employment uses should be directed towards areas around the A33 corridor under Policy EM2 given the ease of access to these sites, but in the instances where CEAs are in less accessible locations (as is the case with the Richfield Avenue CEA) there should be flexibility in the Local Plan to ensure that the uses in the CEA are not restricted to only the pure ‘traditional’ employment uses, but instead there is scope to introduce additional commercial uses that are ancillary to – and complement – the overall employment designation.</p>	<p>Major employment uses are defined in paragraphs 4.3.9 and 4.3.10.</p> <p>The Council has carried out an Employment Area Analysis, which provides background to the designation of Richfield Avenue as a Core Employment Area. The conclusion is that the area still has importance for employment purposes.</p> <p>Nevertheless, the Council recognises that the CEA designation should have some degree of inherent flexibility should the alternative be a long-term vacant site. This is recognised through paragraphs 4.3.11 and 4.3.13.</p>
Thames Properties Limited	Policy EM2	<p>EM2g: Richfield Avenue CEA – Within the Issues and Options document, the Council acknowledged that the Richfield Avenue CEA has aged over time and increasingly become a location for other commercial uses that are non-traditional employment uses, such as a casino, car dealerships and a bar. Appendix 6 to the Issues and Options acknowledged that vacancy levels in the CEA were reasonably high, and that Richfield Avenue itself is characterised by a greater mix of uses than the traditional employment uses around Cardiff Road, Milford Road and Trafford Road. Thames Properties has commissioned Campbell Gordon to undertake a Market Demand Analysis of the area (included in this representation). The Analysis concludes that the CEA is poorly located for modern industrial occupiers – which is reflected in the lack of demand for the larger industrial units – and lacks amenity provision to attract potential occupiers. The market has clearly changed since the CEA was first constructed and industrial occupiers have a greater demand for high-quality space with modern specification, which is a</p>	<p>No change proposed.</p> <p>The Council has carried out an Employment Area Analysis, which provides background to the designation of Richfield Avenue as a Core Employment Area. The conclusion is that the area still has importance for employment purposes.</p> <p>Nevertheless, the Council recognises that the CEA designation should have some degree of inherent flexibility should the alternative be a long-term vacant site. This is recognised through paragraphs 4.3.11 and 4.3.13.</p>

		<p>stark contrast to the existing accommodation in the Richfield Avenue CEA. Even if the outdated accommodation were to be demolished and replaced with modern specification space, Thames Properties is concerned that the units may struggle to let in comparison to those in better locations that are near to major road junctions, often with motorway access. Policy EM2 is therefore correct to direct major employment uses to the A33 corridor but RBC should review the appropriateness of the CEAs listed in the Policy to accommodate only the traditional 'pure' employment uses and allow for flexibility in the Richfield Avenue CEA to accommodate alternative commercial uses that are ancillary to the overarching employment designation.</p>	
Bracknell Forest Council	Policy EM3	<p>It is noted that Policy EM3 seeks to avoid the loss of employment land within core employment areas unless it can be demonstrated there is no long term use for it. It is questioned how effective this will be in limiting the amount of land lost to housing due to the Prior Approval process, should this be an issue in Reading Borough. Bracknell Forest Council has an Article 4 direction in respect of Bracknell's largest designated Employment Areas coming into force on 27th February 2018, in order to regulate the loss of employment floorspace to housing.</p>	<p>Noted. The Council will need to keep this under review. However, prior approval rights as existing will not apply to the majority of Reading's CEAs as there is limited office floorspace. Where further permitted development rights are introduced, the Council will need to consider the case for Article 4 directions.</p>
Sport England	Policy EM3	<p>EM3: Loss of Employment Land – Sport makes a huge contribution to the lives of individuals, to the economy and to society. Sport England has undertaken research to examine the economic value of sport in England. The main conclusions are: In 2010, sport and sport-related activity generated Gross Value Added (GVA) of £20.3 billion – 1.9% of the total GVA in England. This placed sport within the top 15 industry sectors in England and higher than sale and repair of motor vehicles, insurance, telecom services, legal services and accounting. (<i>Economic value of sport in England</i> June 2013 published by Sport England) Sport and sport-related activity is estimated to support over 400,000 full-time equivalent jobs – 2.3% of all jobs in England. Sport also generates a range of wider benefits, both for individuals and society: The benefits of planning sport include the well-being and happiness of individuals taking part, improved health and education, reduction in youth crime,</p>	<p>No change proposed. It is agreed that sport and leisure can contribute to the economy, and that it can provide much needed jobs. However, the Economic Development Needs Assessment has identified a very significant need for industrial and warehouse floorspace. This plays a particular role in bringing balance to the local economy, ensuring space for small businesses and key suppliers and service providers to allow the economy to function. Sports and leisure cannot replace this role. Particular needs for the types of sports and leisure typically accommodated in employment areas (such as gyms) have not been identified in the Western</p>

	<p>environmental benefits, stimulating regeneration and community development, and benefits to the individual and wider society through volunteering. Consumption of sport benefits includes the well-being/happiness of spectators, and the national pride/feel good factor through sporting success/achievement. The economic value of sport in terms of health and volunteering in England is estimated in 2011-2012 to have been £2.7 billion per annum for volunteering and £11.2 billion per annum for health. Traditional forms of employment have been changing in the last 100 years, unfortunately the perception of what employment land is has not. The introduction of B8 distribution challenged local authorities in the 80's and 90's as more of these uses came forward. Sport is often overlooked as an employer. It is estimated that a total of 1,699 people are employed via sport in Reading with an economic generation of £56.5m into the local economy. There are wider values as well in saving £67.4m in the health economy and generating £8.4m in wider spending with a further £16.5m in volunteering. Looking at statistics for Real Estate (1,250) and Water Supply (500) employment sectors in the 2016 in Reading, these figures are all lower than those employed in sport.</p> <p>https://www.nomisweb.co.uk/reports/lmp/la/1946157285/report.aspx and https://www.sportengland.org/our-work/partnering-local-government/tools-directory/economic-value-of-sport-local-model/) It is Sport England's contention that Reading should consider D2 sports uses, fitness clubs, gyms, climbing centres and a five aside centres, to be acceptable on employment sites, as they do create sustainable employment opportunities and provide work experience and qualifications in cases for the less academically inclined. When sports facilities are designed in as part of an employment part e.g. Wolverhampton Business Park or Harwell Science Park, it creates a better and more sustainable working environment and therefore an attractive area for business to locate in or relocate to. Also, it should not be overlooked that there are usually more employment opportunities generated through a commercial gym, e.g. David Lloyd Gyms or</p>	<p>Berkshire Retail and Commercial Leisure Needs Assessment, and there has been a substantial increase in such uses in recent years.</p> <p>It should further be noted that the policy approach is that, where a use could only reasonably located within an employment area, this will be acceptable (4.3.16). This has been used in recent years to allow karting uses (where noise issues make it difficult to locate in residential areas) and climbing walls (where units with high eaves are required) within Core Employment Areas. However, where there is a choice of potential types of location, as would be the case for, for example, gyms, the policy should not be geared towards release of employment floorspace for this use.</p>
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		<p>commercial football e.g. Football First, or a gymnastics club D2 use, than a 500,000m² B8 use. In conclusion, Sport England wishes the Reading Borough Council Local Plan to acknowledge that commercial sports (not retail) are a Bona Fide use on Industrial and Business parks creating employment as well as inputting into the local economy. Therefore, they should be treated like any other business when applying for planning permission for change of use or new development on sites covered in this Plan.</p>	
<p>Thames Properties Limited</p>	<p>Policy EM3</p>	<p>EM3: Loss of Employment Land – Policy EM3 seeks to ensure that the overall level of employment land in the CEAs is maintained. Setting aside whether or not Richfield Avenue still warrants the CEA designation, the policy is ambiguous in requiring the level of ‘employment land’ to be maintained, and whether this applies to floorspace or the total area of the CEA. Thames Properties supports the inclusion in the policy for ‘exceptional circumstances’ which allow the Council to consider alternative commercial uses where there is no long-term prospect of employment use, but raises concern with the requirement for these uses to ‘employ a similar number of people’ and the need to demonstrate over five years of little to no employment prospect in order to demonstrate exceptional circumstances exist. The subtext to the policy at paragraph 4.3.13 is more flexible and recognises that it is often preferable for a site within the CEA to be used for an alternative commercial use that complements the area than for it to be vacant in the long term and does not require a certain number of people to be employed in that alternative use. Thames Properties would like to see greater flexibility within the wording of Policy EM3 to reflect the subtext in the Local Plan. We would suggest the proposed amendment to the second paragraph of EM3 as follows: “Where, in exceptional circumstances, it can be demonstrated that a site in a Core Employment Area has no long-term (i.e. over five years) prospect of ‘pure’ employment use, <u>an related alternative employment commercial use or one that is ancillary to the main employment use of the site</u> may be considered.” The suggested wording allows for non-traditional</p>	<p>Partly agreed. Change proposed. It is agreed that the reference to five years does not belong in the policy, although it is important as a guide to how the policy should be implemented, and therefore belongs in the supporting text (para 4.3.13). A rewording can reflect the potential for ancillary uses. The overall level of employment is still important and should be referred to in policy, but a wording relating to a significant loss of jobs would be less rigid than a statement that could imply exactly the same level of employment is required.</p>

		<p>employment uses and amenity provision that could complement the existing employment uses and make the area more attractive to potential occupiers. Such an approach is considered entirely reflective of the current market demand for employment uses in reading and the locational preferences of future occupiers and recognises that the nature of Richfield Avenue as a CEA is changing. The introduction of such non-traditional employment uses in this location would serve to enhance the vitality and viability of the CEA as a destination for those visiting, living and working in the Borough, which supports Local Plan objective 3. At present, there are no services or amenities within the CEA for the occupiers. RBC should therefore consider a more adaptable policy, which enable the provision of additional non-employment uses that are ancillary to the main employment focus and would support existing occupiers within the CEA while providing greater incentives for occupiers to locate there.</p>	
Thames Properties Limited	Policy EM4	<p>EM4: Maintaining a Variety of Premises – Thames Properties agree with the need to ensure a ‘variety’ of premises and the flexibility built into draft Policy EM4 to allow for proposals for the redevelopment of older industrial units into more flexible employment uses. It is unclear whether this policy relates to industrial units within all existing employment areas including the CEAs, and clarification is sought in this regard. The Richfield Avenue CEA is designated as such under Policy EM2 but contains older industrial units where demand for existing space is often low and it has proven difficult to secure occupiers. The ability to incorporate a variety of more flexible employment uses with greater demand would contribute to improving the overall vitality and viability of the Richfield Avenue CEA. Thames Properties envisages that the Richfield Avenue CEA could be more effectively utilised – subject to flexibility in the wording of Policy EM3 – to incorporate more non-traditional employment uses to serve and sustain the wider CEA. Such uses would be ancillary to the main employment provision within the site and could include uses such as convenience retail provision, food and drink outlets, leisure facilities such as a gym and B1 office space.</p>	<p>Agreed. Change proposed. The supporting text should clarify that this applies both inside and outside the CEA. In terms of additional ancillary facilities, EM" and paragraph 4.3.11 recognise this potential.</p>

		<p>There may also be scope in the CEA to include a small amount of residential accommodation to contribute to meeting Objective 3. The market analysis by Campbell Gordon confirms that the need for commercial occupiers to have nearby amenity has become a key feature of the market and out of town locations are now diversifying their offer of ancillary amenity provision to compete. Green Park is one such example of an out-of-town employment location where the provision of ancillary services to complement the wider employment provision has been extremely successful.</p>	
<p>McCarthy & Stone Retirement Lifestyles Ltd.</p>	<p>Section 4.4</p>	<p>As the market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing development of this nature it is well placed to provide informed comments on the Pre-Submission Draft Local Plan Consultation, insofar as it affects or relates to housing for the elderly.</p> <p>The National Planning Policy Framework stipulates that the planning system should be ‘supporting strong, vibrant and healthy communities’ and highlights the need to ‘deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive mixed communities. Local Planning 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... older people.’</p> <p>The National Planning Practice Guidance reaffirms this in the guidance for assessing housing need in the plan making process entitled “How should the needs for all types of housing be addressed? (Paragraph: 021 Reference ID: 2a-021-20140306) and a separate subsection is provided for “Housing for older people”. This stipulates that “the need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government</p>	<p>No change proposed. It is not agreed that a standalone policy is required.</p> <p>The Berkshire SHMA assessed the needs for housing for older people, and in doing so identified needs of 253 additional residential care spaces, and also assessed the degree to which more specialist forms of C3 housing should be included within the general housing provision, and found that around 7% of Reading’s overall housing provision should be specialist. However, against this context it should be noted that a great deal of extra care housing has been delivered or received permission in recent years.</p> <p>The needs of accommodation for older people are included throughout the document:</p> <ul style="list-style-type: none"> • Policy H6 deals with residential care specifically and proposes to meet the identified need from the SHMA • Policy H5 requires all new housing to be accessible and adaptable • Policy H5 also requires a proportion of 5% wheelchair homes on schemes of 20

		<p>Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under-occupied. The age profile of the population can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing broken down by tenure and type (e.g. Sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (use class C2). But identifying the need for particular types of general housing, such as bungalows, is equally important.”</p> <p>The ‘Housing White Paper: Fixing our broken housing market’ clearly signals that greater consideration must be given to meeting the needs of older persons’ in Local Plans stipulating that ‘Offering older people a better choice of accommodation can help them to live independently for longer and help reduce costs to the social care and health systems. We have already put in place a framework linking planning policy and building regulations to improve delivery of accessible housing. To ensure that there is more consistent delivery of accessible housing, the Government is introducing a new statutory duty through the Neighbourhood Planning Bill on the Secretary of State to produce guidance for local planning authorities on how their local development documents should meet the housing needs of older and disabled people. Guidance produced under this duty will place clearer expectations about planning to meet the needs of older people, including supporting the development of such homes near local services⁸². It will also set a clear expectation that all planning authorities should set policies using the Optional Building Regulations to bring forward an adequate supply of accessible housing to meet local need. In addition, we will explore ways to stimulate the market to deliver new homes for older people.’ (Para 4.42)</p>	<p>dwellings or more</p> <ul style="list-style-type: none"> • Some site allocations are identified for potential residential care, whilst the supporting text to the site allocation policies clarifies that there may be potential on allocated sites for specialist provision.
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		<p>The Pre-submission Local Plan confirms that the Borough has an ageing population. We strongly suggest that the Council for taking a proactive approach in assessing the housing needs of its ageing population. In line with the rest of the country, the document identifies an acceptance that the demographic profile of the Borough is projected to age. The largest proportional increases in the older population are expected to be of the 'frail' elderly, those aged 85 and over, who are more likely to require specialist care and accommodation provided by Extra Care accommodation. It is therefore clear that the provision of adequate support and accommodation for the increasingly ageing demographic profile of the Reading area is a significant challenge. Unless properly planned for, there is likely to be a serious shortfall in specialist accommodation for the older population in the district, which will have a knock on effect in meeting the housing needs of the whole area and wider policy objectives. Specialist accommodation for the elderly, such as that provided by McCarthy and Stone, will therefore have a vital role in meeting the areas housing needs.</p> <p>We would advocate that the Council continues in taking a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population within the Local Plan. We consider that the best approach towards meeting the diverse housing needs of older people is one that encourages both delivery of specialist forms of accommodation such as sheltered / retirement housing and Extra Care accommodation. We believe that a standalone policy to address the needs of older people in the authority should be included in the Local Plan. We would like to highlight the advice provide in the Housing in Later Life: Planning Ahead for Specialist Housing for Older People toolkit. Whilst we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council:</p>	
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		<p>“The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the ‘Lifetime Homes’ standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”</p> <p>Well located and designed specialist housing for older home owners is a highly sustainable form of housing. Given the critical need for older persons accommodation in the Borough there should be a presumption in favour of sustainable housing and in particular specialist housing which is being proposed on suitable sites. This accommodation will come from a number of sources both public and private and with varying levels of care and shelter provision enabling individual people to remain in their own home with independence and security.</p>	
Natural England	Section 4.4	<p>Policy: H4 Legislation/Plan reference: Paragraph 110 of the NPPF states that ‘Plans should allocate land with the least environmental or amenity value’ Issue type: Compliance with NPPF Issues: Development should be directed to sites of least biodiversity value. We do not consider that the policies within the plan, particularly the housing and area-specific policies makes provisions to ensure that development is directed away from areas of high biodiversity value. Solution: We advise that additional policy is incorporated into this policy, or elsewhere in the Housing chapter, in order to ensure that use of previously development land is prioritised for development and use of greenfield land of high biodiversity value is not proposed for</p>	<p>No change proposed. This representation does not appear to relate to H4.</p> <p>This comment seems to advocate a sequential, brownfield-first approach that existed in Planning Policy Guidance Notes some years ago, but is not currently the approach of the NPPF. It also assumes that brownfield land will have lower biodiversity value than greenfield land, which is not always the case.</p> <p>In any case, this approach is not suited to</p>

		development wherever possible. We would then advise that the sites allocated for development within this plan are reviewed in order to ascertain whether they conform to such a revised policy, and modifications proposed to account for any inconsistencies.	Reading. The vast majority of the land proposed for development is brownfield. Reading's position by necessity has always been to maximise the potential of brownfield land, and this is precisely the approach the Local Plan takes. However, there is simply not enough brownfield land to meet Reading's needs, and therefore some use of greenfield land will be necessary. Even with the use of appropriate greenfield land, some housing shortfall still exists, and therefore a prioritisation policy is superfluous as use of greenfield and brownfield is not a binary choice.
Bracknell Forest Council	Policy H1	Housing – Policy H1 seeks to allocate land for 15,433 homes (671 per annum) for the period 2013-2036, This is an increase compared to the previous version of the draft Local Plan which is supported. The Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA) concluded that there was a need for 16,077 homes (699 per annum) over the same period. Therefore, there is a shortfall of 644 dwellings (previously 943 dwellings). It is noted that the Western Berkshire Housing Market Area Strategic Planning Framework acknowledges that there may be a shortfall in Reading Borough and that collaborative working will be required. Bracknell Forest Council believes that in order to meet local need, the unmet need should be addressed as close to Reading as possible.	Noted. No change needed. Reading Borough Council agrees that, within the HMA, needs should be met as close to where they arise as possible. The degree to which needs can be accommodated in each authority will need to be considered through the plan-making process.
Gladman Developments	Policy H1	Policy H1 – fails duty to co-operate, unsound (Positively prepared, justified, effective, consistent with National Policy). Where the OAN is unmet, cross-boundary engagement is required. Gladman would expect the policy to provide certainty that the OAN will be met in full within the housing market area (recognising that the HMA geography overlaps into South Oxfordshire District to the north of Reading) and a commitment given to on-going monitoring of the situation regarding unmet need to ensure that corrective action can be swiftly taken to resolve any issues	Not agreed. No change proposed. The Council has followed the duty to co-operate in seeking to accommodate its unmet needs, having identified the issue early in the plan process, and engaged with its neighbours firstly through the non-statutory framework, then formal duty to co-operate requests and finally

		with delivery that are observed during the plan period. Gladman is concerned that paragraph 1.2.2 is misleading by inferring that the relationship between Reading and South Oxfordshire is different to that between Reading and West Berkshire or Wokingham. The plan must take into consideration that there are opportunities for growth to the north of Reading and that this can be delivered in a sustainable way.	through the MoU. The full description of the process is in the Council's Duty to Co-operate Statement. Paragraph 1.2.1 is absolutely correct in drawing a distinction between the relationship between Reading and Wokingham/West Berks and South Oxfordshire, for the reasons described in that paragraph.
Greater London Authority	Policy H1	The approach to housing need set out in the SHMA is welcomed, in particular the use of the 10-year historic migration trend and the consideration of an adjustment to reflect pre-recession migration patterns to and from London. The Council should note that our latest population and household projections will be published in w/c 10 July 2017. The draft Plan states that the Council cannot accommodate identified need for 943 dwellings within its boundaries over the Plan period. We support the joint West of Berkshire Planning Framework and in particular its strategic perspective on longer term growth opportunities within the area and agree this should be developed as an avenue to address the shortfall identified in the draft Plan.	Noted. No change needed.
Home Builders Federation	Policy H1	Duty to Co-operate – The plan is unsound as the Council have failed to address how its unmet needs will be accommodated. This is required by paragraphs 179 and 181 of the NPPF. Therefore, it is important that where Council's cannot meet their identified levels of housing needs the outcomes of any co-operation clearly show where those unmet development needs will be accommodated. At present the Council and its partner authorities in the West Berkshire HMA have recognised Reading's unmet need of 644 homes over the plan period will need to be accommodated elsewhere. However, there is no indication as to where and when this need will be met. The Local Plan merely states that the Council will continue to work with neighbouring authorities in the West Berkshire HMA to ensure the shortfall is delivered. However, the DtC statement outlines that neither of these authorities have indicated	Not agreed. No change proposed. The Council has followed the duty to co-operate in seeking to accommodate its unmet needs, having identified the issue early in the plan process, and engaged with its neighbours firstly through the non-statutory framework, then formal duty to co-operate requests and finally through the MoU. The full description of the process is in the Council's Duty to Co-operate Statement. However, as stated in NPPG, the duty to co-

	<p>whether or not they will have the capacity to meet Reading’s unmet needs. It would appear that both authorities have not made sufficient progress with their local plans to make any such decisions. We would also question the degree to which the MOU agreed between the Councils supports the Council’s belief that Reading’s unmet needs will be met within the HMA. The MOU sets out in part B of paragraph 2.1 that there is agreement that they will meet unmet needs and, importantly, what would happen if these needs cannot be met within the HMA. Given the non-committal statements made by these Councils are part of the Duty to Co-operate and their slow progress in preparing plans, we do not think the Council can say with sufficient confidence, at this stage, that their unmet housing needs will be met by these authorities. Therefore, whilst the Council has probably undertaken sufficient activity to fulfil the legal aspects of the duty to co-operate we do not consider it to have fulfilled the policy requirements for co-operation as set out in paragraphs 178 to 181 of the NPPF. Despite these concerns we are also aware that the failure of other areas to progress Local Plans should not prevent the Council from bringing forward plans to deliver much needed development. If the Local Plan is to be considered sound we would suggest as a minimum policy H1 be amended setting out that the Council will review its own local plan should the stated level of unmet needs in Reading not be addressed within the submitted local plans of Wokingham, West Berkshire or Bracknell Forest.</p> <p>Policy H1 is currently unsound as it is inconsistent with national policy. We agree with the uplifts applied and consider 699 dpa to be a reasonable assessment of housing needs. Policy H1 sets out the Council’s housing requirement as 15,433 homes or 671 homes per annum. The Council identify that this is 644 homes short of their objectively assessed needs for housing and as such the requirement is based on capacity rather than meeting housing needs. As mentioned above the Council state that they expect the unmet needs for Reading</p>	<p>operate is not a duty to agree. The other Western Berkshire HMA authorities recognise Reading’s shortfall and the need for it to be accommodated within the rest of the HMA area. However, without full assessment of the capacity of individual authorities, it is not possible to apportion it to specific authorities, and to do so without evidence would be unsound and fail to comply with the duty in itself.</p> <p>This issue has been considered recently in relation to the Birmingham Development Plan, in which a far greater level of unmet need was identified, and the Plan was found to be sound and comply with the duty without identifying the specific apportionment of that unmet need, as the relevant authorities were not at that stage of plan-making. More detail is set out in the Council’s Duty to Co-operate Statement.</p>
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		to be met within the HMA. However, as we have already stated there is limited evidence to show that these needs will be met within the HMA and as such policy H1 is not consistent with paragraph 47 of the NPPF which establishes that the local plan should meet the full objectively assessed needs for housing within the HMA. Whilst the local plan states that there will be continuing dialogue on this issue there are no statements within any of the agreed Memoranda of Understanding that other LPAs will deliver additional housing in order to address Reading's unmet needs. As highlighted earlier, there will be a need to ensure that there are mechanisms to ensure that the Council reviews the Local Plan should the other authorities in the HMA not be able to address this shortfall.	
Oxfordshire County Council	Policy H1	OCC has no objection in principle to the scale and distribution of the housing growth proposed in the draft Plan.	Noted. No change needed.
Reading Friends of the Earth	Policy H1	Soundness: This is not sound because projected population growth in Reading and central Berkshire will make it less environmentally and economically sustainable and less attractive, so much lower figures – on a declining trend - should be adopted for housing so that this remains an attractive and prosperous area. See NPPF Paragraph 14 'plan-making'. It is important that some available land remains at 2036 but the draft Plan would leave none. Modification: Replace "Provision will be made for at least an additional 15,433 homes (averaging 671 homes per annum) in Reading Borough for the period 2013 to 2036." with "Provision will be made for 671 homes per annum in Reading Borough for the period 2013 to 2023 after which the rate of new housebuilding will decline linearly to zero by 2036 unless this plan is revised"	No change proposed. It is quite clear that national policy expectations are that Local Plans should significantly boost the supply of housing, and at a local level, Reading is suffering from a substantial shortage of housing, particularly affordable housing. Declining to zero by the end of the plan period would not be in accordance with national policy and would stand little chance of being found sound, and would fail to respond to local housing issues.
Royal Borough of Windsor and Maidenhead	Policy H1	H1 - The Royal Borough of Windsor and Maidenhead agrees that the housing requirements of Reading Borough Council should be met by the three Local Authorities within the Western Berkshire Housing Market Area.	Noted. No change needed.
SGN and Danescroft	Policy H1	H1: Provision of Housing - For the reasons set out in Section 4 however, it is considered that the Gas Holder site is capable of accommodating a higher number of dwellings than the Pre-Submission Draft Local Plan	No change proposed. As set out in the response to representations on site CR13d, the acceptability of this level of residential provision

		currently envisages. Increasing the allocation of the Gas Holder site to a minimum of 100 dwellings would help to increase the number of new homes that can be provided for in Policy H2. This would provide a modest reduction to the identified shortfall compared to the OAN, and thus reduce the number of new homes that surrounding authorities in the Western Berkshire HMA are expected to accommodate. Whilst it is recognised that this would only have a modest impact on the Council's housing shortfall (between 30 and 74 dwellings, or between 4.7% and 11.5%), this could make the difference between whether or not a neighbouring authority is required to allocate an additional site (or more) for development.	on this site has not been demonstrated. The dwelling ranges specified are indicative, and even if it were the case that more homes can be achieved on a certain site, this might be balanced by less homes being achieved on a different site.
Slough Borough Council	Policy H1	Meeting Objectively Assessed Housing Need - Reading objectively assessed housing need is 16,077, Policy H1 states that only 15,433 can be delivered in Reading Borough. Delivering this level of housing set out in policy H1 will mean there is a shortfall of 644 dwellings. Slough supports this approach which recognises that Reading is a very tightly defined urban area, and sites for new development are limited. This means that, like Slough there is not enough land to meet the objectively assessed housing needs within the Borough. The Reading draft local plan states that the need will be accommodated elsewhere within the Western Berkshire Housing Market Area. It is considered that Slough Borough Council supports this approach.	Noted. No change needed.
Sonic Star Properties Ltd	Policies H1 and H2	Emerging Policy H1 and H2 identifies the housing need over the plan period for the Borough. The Draft Plan identifies a need for 16,077 homes of which 15,433 can be accommodated in Reading Borough. This leaves a shortfall of 644 homes to be delivered across the HMA. It should be recognised therefore that in areas of the borough where the greatest level of development is expected i.e. Reading, that higher densities will be supported in urban areas and / or accessible locations in order to achieve the borough's target for housing delivery.	No change proposed. The Local Plan already makes clear that higher densities will be appropriate in accessible locations in CC6 and through the densities in H2, and the ability to accommodate housing has been calculated on that basis.
South Oxfordshire District Council	Policy H1	Policy H1: Provision of Housing – This policy makes provision for 15,433 homes in Reading for the period 2013 to 2036, equating to 671 homes per annum over the plan period. The requirement is based on the	Noted. No change needed.

		<p>results of the Reading Housing and Economic Land Availability Assessment (May 2017). Reading’s objectively assessed need, identified in the Berkshire (with South Bucks) SHMA (2016) is 699 dwellings a year, a total of 16,077 between 2013-2036. The Local Plan therefore identifies a shortfall of 644 dwellings in total. The Local Plan recognises that this will need to be accommodated within the Western Berkshire Housing Market Area (Bracknell Forest BC, RBC, West Berkshire DC and Wokingham BC). The local authorities that lie within the Western Berkshire Housing Market Area have agreed that the full objectively assessed housing need should be met with the Western Berkshire Housing Market Area. We note the shortfall identified by RBC and fully agree that this should be accommodated within the Western Berkshire Housing Market Area and we strongly support the ongoing cooperation between the four Western Berkshire authorities.</p>	
Thames Properties Limited	Policy H1	<p>H1: Provision of Housing – As set out above, Policy H1 relies on Reading’s unmet need being met by neighbouring authorities in the HMA but there is no commitment to this by the other Authorities within the HMA. Thames Properties is supportive of the Councils approach to reconsider employment sites that are no longer fulfilling their role and may be better utilised for residential development, as is the case with WR3a. We suggest that RBC considers whether additional sites within employment areas, beyond those already identified, could be used more efficiently to accommodate housing.</p>	<p>No change proposed. The Council must seek to meet its objectively assessed needs for housing under the NPPF, but it must also seek to meet its objectively assessed needs for employment. There are also considerable needs for employment development, and allocating large swathes of employment land for housing will only mean that Reading fails to meet its employment needs instead. All employment areas were considered for their suitability for continued employment in the Employment Area Analysis and for other uses in the Housing and Economic Land Availability Assessment, and where there is potential for release for housing, this is brought forward as an allocation.</p>
Thames Properties Limited	Policy H1	<p>Duty to Co-operate – We are pleased to see the RBC has acknowledged its Duty to Co-operate with neighbouring LPAs in the Western Berkshire HMA to accommodate unmet need as outlined in H1, but we have concerns with whether this can be achieved. H1 is vague in terms of</p>	<p>No change proposed. The other Western Berkshire HMA authorities recognise Reading’s shortfall and the need for it to be accommodated within the rest of the HMA area. However,</p>

		<p>which neighbouring authorities within the HMA could accommodate the unmet need and simply states that “The Council will continue to work with neighbouring authorities” to ensure that the shortfall is met. The Local Plan could be stronger in terms of the Council’s commitment to working with neighbouring authorities to ensure that its OAN is met, as well as in relation to cross-boundary matters such a strategic infrastructure and employment provision.</p>	<p>without full assessment of the capacity of individual authorities, it is not possible to apportion it to specific authorities, and to do so without evidence would be unsound and fail to comply with the duty in itself. Together with the wording of H1 and supporting text, paragraphs 11.1.4 and 11.1.5 of the monitoring framework set out more detail on how the Council will keep this under review, and it therefore represents a commitment to work on these issues.</p>
Unite Students	Policy H1	<p>H1: Provision of Housing - The supporting text of Draft Policy H1: Provision of Housing recognises the pressing need for additional housing in Reading and the surrounding area but does not recognise in any form the important contribution that purpose built student accommodation can make to meeting this demand. We recommend the following amendments to the supporting text of Draft Policy H1: Provision of Housing.</p> <ul style="list-style-type: none"> • The supporting text should include that purpose built student accommodation forms an important part of the housing need in Reading and such accommodation can be counted towards meeting the housing need. 	<p>No change proposed. The Council reserves the right to count student accommodation against housing needs in undertaking its monitoring, as national guidance enables. However, given the very significant levels of need for new homes, it is not considered that a policy statement that student accommodation meets these general needs is appropriate.</p>
University of Reading	Policy H1	<p>Policy H1: The University considers this policy unsound in that it is not positively prepared or consistent with national policy by virtue of not taking all opportunity to accommodate its full OAHN by efficient use of residential development sites and through the Duty to Cooperate. The University remains of the view that the Plan should increase the housing target beyond 700dpa to help deliver affordable housing. There is no evidence to suggest that other Council areas within the HMA are able to accommodate Reading Borough’s shortfall. Accordingly, the Council should ensure that there is provision for a review of the Local Plan in the event that other authorities within the HMA are unable to address this shortfall in accordance with paragraph 179 of the NPPF. The University recognises the Council’s desire to accommodate as much of the OAHN</p>	<p>No change proposed. The Council has sought to meet its needs within its area insofar as is possible and consistent with the principles of sustainable development, as evidenced by the Housing and Economic Land Availability Assessment. However, it is not possible to meet the full needs within this very constrained Borough, and a shortfall has therefore been identified. The Council has followed the duty to co-operate in seeking to accommodate its unmet needs, having identified the issue early in the plan process, and engaged with its neighbours</p>

		<p>within the Borough, however, would advise the Council that in order to do so, it must make full efficient use of all residential allocations. This would include allowing flexibility within allocation policy wording, such as that for the Boat Club and Redlands Road sites, to maximise residential development potential. For example, the Boat Club site may accommodate a greater number subject to higher densities and the use of flood mitigation measures.</p>	<p>firstly through the non-statutory framework, then formal duty to co-operate requests and finally through the MoU. There is considered to be no reason to believe that the small shortfall cannot be accommodated elsewhere in the HMA. The full description of the process is in the Council's Duty to Co-operate Statement. As such, it is not agreed that the fact that the full need is not met renders the plan unsound.</p>
Viridis Real Estate Services Ltd	Policy H1	<p>Policy H1: Provision of Housing - As set out in the FDLP response (pages 3 and 4) the objectively assessed need (OAN) for Reading is 16,077. Draft Policy H1 states that the Local Plan will make provision for 15,433 homes up to 2036, which equates to a shortfall of 644 dwellings per annum. The Council's justification for this is that Reading is tightly constrained and that this therefore limits development opportunities. The Reading Housing and Economic Land Availability Assessment (HELAA) provides the evidential basis for the Council's approach to establishing the housing capacity within its administrative area. However, we would challenge the methodology for assessing the capacity of Reading, specifically the assumptions made in relation to density which remain unchanged from the Council's Regulation 18 consultation (see Viridis' FDLP response, pages 3-5). Further evidence that the HELAA underestimates the development capacity of Reading can be found in two recent planning decisions the Council has made, including:</p> <ul style="list-style-type: none"> • Former Cooper BMW garage on Kings Meadow Road (to the west of the Viridis site) for 315 dwellings at a density of 642 dph (reference 162166/FUL). • Toys R Us and Homebase on Kenavon Drive (to the south of the Viridis site) has a Council resolution to grant planning permission for 765 dwellings is at a density of 273 dph (reference 170509/FUL). <p>These individual densities significantly exceed those set out in the</p>	<p>No change proposed. It is not agreed that the capacity of Reading is underestimated.</p> <p>With reference to the approach of the HELAA, the approach to the two sites quoted is different to CR13c as it is a manual calculation rather than the application of a pattern book approach. It should be noted that the November 2017 version contains the 315 figure as permitted for the former Cooper BMW site in any case, and it is assumed this is a reference to a historic version, as assumptions have evolved. However, it is clearly the case that the HELAA cannot always necessarily anticipate the exact dwelling figures to be achieved, particularly on large, complex mixed use sites. Whilst some sites may be higher, others will be lower. For instance, the HELAA has had to take account of a number of sites where anticipated potential redevelopment has now been replaced by the conversion of buildings under permitted development rights, for fewer dwellings. There has also been a representation on part of the neighbouring Forbury Retail Park site from the owners, stating</p>

		<p>HELAA and the associated site assessments. This demonstrates that the approach the Council has taken in its assessment of the development capacity of Reading is too precautionary and Policy H1 is therefore contrary to paragraph 47 of the NPPF in failing to significantly boost the supply of homes by not planning for the OAN of Reading. On this basis Policy H1 does not meet the following tests of soundness:</p> <ul style="list-style-type: none"> • positively prepared; and • consistent with national policy. <p>We would request that the Local Plan adopt a more positive approach to the capacity of Reading, particularly in Central Reading and the major opportunity areas where access to public transport, services and amenities is greatest. This should be achieved by optimising the development opportunities of sites in accordance with the NPPF in order to deliver as many homes as reasonably possible within the Council's administrative area and to address the OAN of Reading. Until such time that the Council has prepared a HELAA that properly assesses the capacity of Reading, Policy H1 should be amended to address the OAN, as follows. <i>“Provision will be made for at least an additional 15,433 homes (averaging 671 homes per annum) in Reading Borough for the period 2013 to 2036.</i></p> <p><i><u>To address the objectively assessed need of Reading Borough, the Council will require applicants to make efficient use of land and to optimise the development potential of sites to deliver as many homes as possible, having regard to policy and site constraints. The Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that the any identified shortfall of 644 dwellings that cannot be provided within Reading will be met over the plan period.”</u></i></p>	<p>that development in the plan period is unlikely, meaning that it now cannot be accounted for in the HELAA figures. Finally, the site to the east, 42 Kenavon Drive, is an example of how capacity can decrease when delivered – it was once permitted for 542 dwellings, and this was assumed in capacity exercises, but the final development totalled a much lower 192. The important factor is whether the HELAA strikes the right note across the board, in order to produce an ambitious but ultimately deliverable figure, and it is not agreed that there are fundamental issues with the approach that affect its robustness.</p>
West Berkshire District Council	Policy H1	<p>WBDC welcome that Reading has identified an increase in their housing provision figure (as identified in policy H1) thereby reducing their unmet housing need that will have to be met outside of Reading borough. WBDC will work together with the other authorities within the Western Berkshire Housing Market Area (HMA) in relation to Reading's unmet</p>	<p>Noted. No change needed. Discussions around this issue within the Western Berkshire HMA will continue under the duty to co-operate.</p>

		need. A Memorandum of Understanding on Reading's unmet need has now been agreed between the authorities in the Western Berkshire HMA.	
Wokingham Borough Council	Policy H1	Provision of Housing – Since the last draft Plan consultation, Reading Borough Council has taken further analysis which demonstrates that they are able to accommodate more of its own housing need than previously suggested. There remains however a modest shortfall against the overall need. In October 2017, a Memorandum of Understanding (MoU) between the four local authorities in the Western Berkshire HMA was signed noting the modest shortfall from Reading and agreeing that the authorities will work together to address this. No agreement has been reached as to where the shortfall should be addressed and ongoing dialogue is required between Wokingham Borough Council, Bracknell Forest Council and West Berkshire Council. Wokingham Borough Council already has the highest assessed housing need within the Western Berkshire HMA (assessed as 856 dwellings per annum and increased to 894 dwellings per annum through planning appeals). This will need to be reflected within the ongoing discussions. With Policy H1 being in line with the agreed MoU it is recommended that no objection is raised on this matter.	Noted. No change needed. Discussions around this issue within the Western Berkshire HMA will continue under the duty to co-operate.
Aviva Life and Pensions UK Ltd	Policy H2	H2 – Aviva welcomes the clarification that indicative densities are provided and recognises that a different density may be appropriate.	Noted. No change needed.
Booker Group PLC	Policy H2	H2: Density and Mix – We support a policy approach that allows for the constraints and opportunities of each development site to be taken into account, and does not set overly prescriptive requirements that would not be appropriate in all areas. It is welcomed that the requirement for 50% of dwellings to be of 3 bedrooms or more will have regard to all other material considerations. However, we consider that the policy should be amended to confirm that this should also be subject to the site being suitable, feasible and viable. We welcome that the requirement to include at least 10% of plots as self-build has been removed, with developers now encouraged to consider providing self-build housing. The provision of self-build plots is likely to have had a	Noted. No change proposed. Policy H2, when discussing mix requirements, states that this will be subject to all other material considerations. Viability will be a material consideration to be taken into account here.

		significant effect on the viability of residential schemes and should be given careful consideration.	
Historic England	Policy H2	Policy H2 - Historic England welcomes and supports Policy H2 Density and Mix for its reference to heritage assets as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Home Builders Federation	Policy H2	H2: Density and Mix – This policy with regard to self and custom build housing is unsound as it is not effective. In line with PPG the Council only require applicants to making appropriate provision for self or custom build housing. This is consistent with paragraph 57-025 which states that Councils should encourage land owners to consider supporting self and custom build housing. However, paragraph 4.4.14 then sets out a formula as to the level of provision expected. This would seem to be inconsistent with the approach set out both in Reading’s policy and in PPG and suggests that applicants would be required to provide plots of self and custom housebuilders. The formula is also ineffective and unfair as it could potentially place a greater burden on development coming forward later on in the plan period should the list grow disproportionately.	No change proposed. The formula operates in tandem with the policy. The policy refers to ‘appropriate provision’, and without some means of calculating what that means, the policy is not capable of implementation. It is true that there may be greater (or indeed lesser) expectations later in the plan period, but the Council has a statutory duty to grant permissions for sufficient plots to meet the register, and the policy must therefore be able to respond to changes in the register. The Draft Local Plan policy received objections from developers precisely because it did not have such a mechanism.
SGN and Danescroft	Policy H2	H2: Density and Mix - The changes made to clarify the requirements in draft Policy H2 in respect of self-build plots following our previous representations on the Draft Local Plan (June 2017) are welcomed and supported. In particular the confirmation that self-build plots apply to houses only, that the requirement is linked to the self-build register (rather than a target percentage), and that any unsold plots can revert to the developer after 12 months of marketing.	Noted. No change needed.
University of Reading	Policy H2	Policy H2: The University considers that not all developments would be capable of complying with the requirements of this Policy and therefore does not consider this Policy to be effective. It is considered unsound. For example, residential flat schemes or student accommodation developments exceeding ten units would not be able to provide self or custom-build plots by their nature. The University agrees with the	No change proposed. This part of the policy clearly states that it is applicable only to developments that would provide new houses, not flats or student accommodation.

		general principles of what the Council is seeking to achieve with regard to self or custom build plots, however, the requirement should be applied on a case by case basis, where feasible and appropriate.	
Bracknell Forest Council	Paragraph 4.4.7	Paragraph 4.4.7 sets out indicative density ranges for the Town Centre, urban and suburban areas. Whilst it is noted that this paragraph has been expanded to reference Policy CC6 and provide an example of how it is indicative and not a hard-and-fast rule, it is still considered that application of these densities could have consequences for the ability to deliver dwellings and meet needs – this particularly applies to ‘fringe’ areas.	No change proposed. As stated, these are not hard and fast densities. However, these are substantially higher densities than in existing policy, and likely to be substantially higher than most other locations within the HMA, and it is not considered that they will have the effect of artificially suppressing housing delivery.
Aviva Life and Pensions UK Ltd	Policy H3	<p>H3 – Aviva supports NPPF paragraph 173 which defines viable development as that which provides a competitive return to a willing land owner and willing developer and is deliverable. As such, the NPPF considers contributions for affordable housing should not impede the viability and delivery of development. It is considered that greater explanation should be provided in this document and that the Affordable Housing SPD should be updated as a priority as the policy fails to mention how it intends to deal with changes that may be brought forward on a National level. We consider that the policy should contain greater references to the explanatory text provided such as paragraph</p> <p>4.4.23. Aviva welcomes the move towards transparency and openness in the viability process, but we consider that this must not be at the expense of disclosing commercially sensitive information. There is concern raised with the current wording of the policy at present, which states “In all cases where proposals fall short of the policy target 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.” Many viability assessments include commercially sensitive information, such as allowances for the acquisition of third party land, rights of light, vacant possession, compensation costs or</p>	<p>No change proposed.</p> <p>It is accepted that any changes to policy at national level will be a material consideration, so there is no need for this local plan to anticipate changes that might be brought forward some time in the future. However, as noted with reference to the judgement of the Court of Appeal in the case referred to the Background Paper for Policy H3, decisions can determine that local circumstances may justify an exception to national policy.</p> <p>The Council’s current policy, Explanatory text and SPD already refer to open book viability appraisals. This is not a new policy position for RBC. A number of local authorities (e.g. Brighton and several in London) are now moving much more formally to open book appraisals being part of planning application validation requirements. They require Viability assessments to be submitted with the application. They also publish them on their websites to ensure all parties have access to the</p>

		<p>other information that would severely compromise the applicant’s commercial position. If there are elements of the information within the assessment which the applicant considers should not be disclosed on the basis that they are commercially sensitive, and they have provided justification for this then this information should be redacted. We consider that there should be no general assumption of sharing commercially sensitive viability information without express permission from applications even without the submission of such justification provided by the applicant. We are concerned about the adverse effect that incorrect disclosure could have on applicants. As such, we consider that the policy should be clarified and include reference to ensure that the Council notifies the applicant of any Freedom of Information (FOI) requests and if the disclosure is agreed by the applicant then the process can be managed accordingly. Given the complexity and evolving nature of viability assessments, we consider that they should only be submitted when key aspects of the proposed scheme has been finalised, unless (as indicated above) the viability will influence the Council’s approach to design, etc. It should be recognised that applications for major developments, especially for outline and hybrid schemes will evolve as a result of continued discussions and feedback from consultation, including statutory consultees. We would welcome the Council’s acknowledgement that development schemes will evolve post submission and the viability assessment will also need to evolve in response.</p>	<p>reasoning behind any arguments that a development cannot afford affordable housing.</p> <p>Interestingly, the draft Revised NPPF clearly advocates an open book approach. It states, “any viability assessment should be prepared on the basis that it will be made publicly available other than in exceptional circumstances. The government doesn’t believe that information should be withheld on grounds of commercial sensitivity. Most of the figures used are industry standard anyway. The government intends to produce a standard executive summary template for such appraisals with a view that this is published as part of the application process.”</p> <p>There is therefore no reason anymore for any applicant to believe that permission will be given for developments that no not provide policy compliant affordable housing unless all information upon which such a decision will be based is not in the public domain.</p>
Booker Group PLC	Policy H3	<p>H3: Affordable Housing – We support this approach and consider that developers should be given the opportunity to submit evidence which demonstrates the level of affordable housing that can be provided without jeopardising the viability of the development. This is in accordance with the NPPF which states that in pursuing sustainable development, careful attention to viability and costs in plan-making and decision-taking must be taken and that plans should be deliverable (Paragraph 179).</p>	<p>Noted. No change needed.</p>
Bracknell Forest	Policy H3	<p>It is also noted that the draft Local Plan contains a policy to help address</p>	<p>Noted. As indicated in the Background Paper for</p>

Council		the shortfall of affordable housing within the Borough. The SHMA identified a need of 406 affordable dwellings per annum in Reading Borough. Since this forms a significant part of the Borough's overall need, there may be viability issues in delivering this amount of affordable housing, even with Policy H3 requiring contributions (either financial, or on site provision) from all development involving a net increase in housing (C3). Some concern is expressed that this may have implications for the wider HMA.	Policy H3, Reading Borough Council along with West Berkshire Council went to the High Court and Court of Appeal in order to avoid losing a valuable part of their affordable housing supply. This emphasises the importance and priority that is given to the provision of affordable housing. Reading Borough Council always seeks to maximise the provision of affordable housing within the context of government policy and considerations relating to viability.
Gladman Developments	Policy H3	Policy H3 – unsound (Justified, consistent with National Policy). The Council's evidence does not include a viability assessment that tests the implications of the proposed policies within the local plan in line with Paragraph 173 of the NPPF. The absence of this work means that it is not possible for interested parties to assess whether policies are justified, effective or consistent.	No change proposed. A Viability Assessment has been undertaken and included within the evidence base, which demonstrates that the requirements of the Local Plan will not render development unviable.
Home Builders Federation	Policy H3	H3: Affordable Housing – The policy is unsound as it is not consistent with national policy and is unjustified. As highlighted above the Council have not published a viability assessment as part of the evidence supporting the Local Plan. As such we cannot comment on the cumulative impact of the policies in the plan and whether the plan is justified and consistent with paragraph 173 of the NPPF. We would suggest that further consultation is required to comply with the relevant regulation and reserve the right to comment in more detail at the examination in public. Other comments relating to soundness are set out below. This policy seeks contributions, both in the form of on-site provision of affordable housing and financial contributions, from development 10 or fewer units. This is inconsistent with national policy as established in PPG paragraph 23b-031 which sets out that planning obligations cannot be collected from development of 10 or less units and of no more than 1,000 sq. m. These were initially set out in the ministerial statement of 28 th of November which following judicial review where given legal effect on the 13 May 2016. In the judicial	Noted. A local plan viability report has now been published and made available to interested parties including those making representations about its availability. The preparation of the report has informed the Council's policy position but unfortunately it was not published at the same time as the Pre Submission Draft Local Plan. While policy targets remain unchanged from the existing development plan, it is clear from the report that viability has improved since the original viability report which provided the evidence that informed the current policies. As indicated in the introduction to Background Paper for Policy H3, the Council is of the view that local circumstances, in terms of need for affordable housing and challenges in providing

		<p>review it was recognised that ministerial statements have the same weight as the NPPF with regard to the preparation of local plans and the planning application decision making process. Paragraph 4.4.19 argues that there is an exceptional need for affordable housing in Reading. However, we would suggest that the need for housing is no more exceptional in Reading than in many other areas of the wider South East. Like many areas there is a clear need for affordable housing but it is also important to remember that the Government’s reasons for the introduction of this threshold was to tackle: <i>“the disproportionate burden of planning obligations on small-scale developers, custom and self-builders.”</i> The intention of this policy, as set out in the ministerial statement, was to lower the construction cost of small-scale new build housing and help increase housing supply. In particular, the Government was seeking to encourage development on smaller brownfield sites and help to diversify the house building sector by providing a much-needed boost to small and medium-sized developers. In considering the introduction of such a policy the Government would have been aware of its impacts on affordable housing delivery. However, the have considered it more appropriate to support small and medium sized housebuilders recognising the important contribution they play in delivering new homes. The Council also argue that the legal judgement clarified that the statement does not have the effect of overriding a local policy. The Council also suggests that the judgment by the Appeal Court has clarified that the statement does not have the effect of overriding local policy where there was exceptional need for affordable housing. It is true that the weight to attach to policies is a matter of discretion for the Local Authority, in particular where a change in national policy leads to a conflict with an adopted local plan. This is an inevitable consequence of policy change. However, where a plan is being prepared it must be remembered that the NPPF has established that I must be consistent with national policy in order to be found sound. The judgement also makes no statement that the exceptional need for affordable housing is sufficient evidence for national policy on</p>	<p>such housing with the borough, justify no thresholds, as an exception to the national policy. The attached Appeal Statement sets out the case with evidence for this position. The Council believes that the exceptional local circumstances clearly exist for a policy in the local plan that does not conform to the guidance in the NPPG in this instance. That is a matter that can be considered in determining the soundness of planning policy.</p>
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	<p>this matter to be set aside in favour of a local policy. As set out above the policies intentions were to reduce the financial small and medium sized housebuilders to bring forward smaller sites in order to bring forward more small-scale development. The Council have provided no evidence that the proposed obligations in policy H3 will not be a burden on this sector of the housing industry nor the relative contribution of small sites to overall affordable housing provision. In fact, there is virtually no evidence supporting this significant departure from government policy. As such we consider this policy to be unsound and it should be amended to reflect Government policy as set out in paragraph 23b-031 of PPG. <i>Size, type and tenure mix of affordable housing</i> – The policy does not give a clear indication as to the size type and tenure mix of the affordable housing it will expect development to achieve. It is proposed that this will be done on a site by site basis and in relation to the current evidence on assessed needs. Whilst we welcome flexibility within policies it is important that they provide some guidance as to the requirements expected from an applicant. The current approach within this policy would leave an applicant, and indeed the decision maker, with very little understanding of whether a proposed scheme is policy compliant. The NPPF establishes in both paragraph 17 and 154 that local plans should ensure decisions can be made with a high degree of predictability and that policies should provide a clear indication as to how decision makers should react. Policy H3 currently fails to achieve this in relation to the size type and mix of affordable housing. It would appear from the supporting text that the Council intends to set out in supplementary planning documents more detail as to the required size, type and tenure mix for any affordable housing contributions. However, we would consider this approach to be inappropriate as it does not allow the impact of these policies to be fully tested during the examination of the local plan. The approach to the type, size and tenure mix of affordable housing can have a significant impact on the viability of development and, in line with paragraph 173 of the NPPF, it must be considered as part of the whole plan viability assessment.</p>	<p>There is a limit to the level of detail that is appropriate for a local plan which is seeking to set planning policy over a lengthy period and which will operate for some time before it is reviewed. The Local Plan Viability report clearly looks at a broad range of tenure options in the various scenarios that it tested and found that all the various tenures would be supported in varying amounts at the current time. However, we appreciate that circumstances change and that factors relating to viability change quickly. Consequently from time to time, there is a need to adjust and find tune the detail of policies. Our current policy has been to deal with more detailed matters through an SPD. SPD's are relatively easy to prepare and amend and can be adjusted speedily in response to rapidly changing circumstances. A local plan is not nearly so easy to change. Our view remains that such a level of detail is not appropriate for a local plan policy.</p>
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<p>McCarthy & Stone Retirement Lifestyles Ltd.</p>	<p>Policy H3</p>	<p>Policy H3 refers to an "open book" approach. This is misleading as it suggests that a viability assessment should be based on the individuals own costs and revenues, effectively a tax on the individual builder's performance. It is well established that viability modelling of this nature is based on generic inputs particularly relating to revenues and build costs. Reference to "open book" should therefore be deleted with sole reference to "transparent process" being entirely adequate and presumably what is really being sought here.</p>	<p>No change proposed. The Council's current policy, Explanatory text and SPD already refer to open book viability appraisals. This is not a new policy position for RBC. Interestingly, the draft Revised NPPF clearly advocates an open book approach. It states, "any viability assessment should be prepared on the basis that it will be made publicly available other than in exceptional circumstances. The government doesn't believe that information should be withheld on grounds of commercial sensitivity. Most of the figures used are industry standard anyway. The government intends to produce a standard executive summary template for such appraisals with a view that this is published as part of the application process."</p>
<p>Rentplus UK Ltd</p>	<p>H3: Affordable Housing</p>	<p>We represent Rentplus UK Ltd, an innovative company providing affordable rent to buy housing from working people aspiring to home ownership with an accessible route to achieve their dream through the rent – save – own model, We have previously responded to the Issues and Options and Draft consultations, submitting responses together with an Affordable Housing Statement which sets out the model's compliance with the current NPPF definition of affordable housing. That document is enclosed with this response once more so that the Inspector may have the details to hand when examining the Local Plan policies. Policy H3: Affordable Housing—WE have previously sought a wider description of affordable housing in this policy to ensure that it remains consistent with national planning policy. Through a number of national consultations, the Government has sought feedback on proposals to widen the definition of affordable housing, including last year's housing White Paper, <i>Fixing our Broken Housing Market</i> which stated: "Rent to Buy homes...will enable thousands of households to</p>	<p>No change proposed. The current NPPF makes no reference to such housing. Unfortunately, Annex 2: Glossary, in the new draft NPPF (March 2018) does include reference to rent to buy as a form of affordable housing under the category of "Other affordable routes to home ownership." An article in Inside Housing in November 2017 (https://www.insidehousing.co.uk/news/news/only-one-in-10-rent-to-buy-tenants-purchases-home-53245) found that only one in ten tenants managed to successfully buy their home in such accommodation. Clearly it is a very poor form of affordable housing and the mass of those on the Council's housing register are unlikely to be able to make it work for them. Nevertheless, the Local Plan</p>

		<p>access home ownership through a product that fits their circumstances. Rent to Buy will help hard-working households to benefit from a discounted rent set flexibly at levels to make it locally affordable so they can save for a deposit to purchase their home.” (Paragraph 4.28) The definitions contained within Box 4 of that consultation included reference to rent to buy, albeit under the description of intermediate affordable housing – this does not reflect the practical nature of the tenure which is occupied by tenants at an affordable rent, under a 20-year full repairing lease through partner housing associations, prior to purchase. The Communities Secretary Sajid Javid indicated in a statement to the House of Commons late last year that CLG is looking at including affordable rent to buy as a separate tenure in the update to the NPPF, while the Prime Minister Theresa May announced in a speech on 3 January 2018 that she has made it her: “personal mission to build the homes this country needs so we can restore the dream of home ownership for people up and down the UK.” As set out in our previous responses, the Rentplus affordable rent to buy model addresses the primary barrier to home ownership – the lack of a mortgage deposit – through a combination of a secure rented period at an affordable rent, giving time to save, and a 10% gifted deposit to enable tenants to buy their own home in 5, 10, 15 or 20 years. In this way it extends the opportunity of home ownership to families who are otherwise unable to afford it and to do so within a timeframe to suit their circumstances. The aim of the model is to help those hard working families unable to access shared ownership, starter homes or homes on the open market overcome the mortgage deposit ‘gap’ by enabling real savings to be built while renting at an affordable rent – 80% of open market rent (including any service charge) or Local Housing Allowance (whichever is the lower). Policy H3 seeks to enable the delivery of those affordable housing tenures are currently explicitly defined in the NPPF, providing planning and housing officers with no opportunity to take a flexible approach to individual application delivering alternative models. Whilst affordable rent to buy is not yet formally recognised within national planning</p>	<p>has been drafted in the context of the NPPF and the content of the NPPF, including the definition of affordable housing will be a material consideration in the determination of planning applications.</p>
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		<p>policy, it does provide the Borough Council with an additional route to providing affordable housing, diversifying local housing options and extending the opportunity of home ownership to a greater number of local people. Unlike shared ownership and started homes, affordable rent to buy does not require an upfront mortgage deposit; those and other intermediate affordable housing tenures fall short of helping those people who have the ability to save while renting an affordable home to realise their aspiration of ownership. The NPPF asks local planning authorities to seek to meet their full affordable housing needs, and to widen opportunities for home ownership – flexible planning policies encourage developers to bring forward housing developments that properly reflect local housing needs and aspirations, and work effectively to meet a diverse range of housing needs. To ensure that Policy 3 can be found sound at examination, we recommend the following amendments: In determining residential applications, the Council will assess the site size, suitability and type of units to be delivered in relation to the current <u>best available</u> evidence of identified needs. The Council will seek an appropriate tenure mix of affordable housing to include social rented, affordable rent, intermediate rented and shared ownership affordable units <u>tenures</u>. The affordable units provided should be integrated into the development. We consider the above changes will ensure the policy is suitably flexible, enabling it to be implemented effectively by the Council in advising developers and negotiating with applicants on individual development proposals. This we consider will also future-proof the policy, helping to ensure that the planned changes to the NPPF do not require a rapid review of the Local Plan prior to or following adoption.</p>	
Rowe, Dr Simon	Policy H3	<p>Affordable Housing: the Council MUST be tough on this. Otherwise, many vital but lower paid jobs will have to commute into the city from elsewhere, or be vacant.</p>	<p>Noted. No change proposed. The Council has a substantial need for affordable housing. In addition to seeking opportunities to build its own homes, the Councils seeks substantial contributions from development, but must set this at a level which allows development to be</p>

			viable.
Sonic Star Properties Ltd	Policy H3	Emerging Policy H3 requires a target of 30% affordable housing on sites of ten or more dwellings. Where any proposal falls short of the target a financial appraisal will be required to support an application. It should be clearly highlighted in this policy that all site specific considerations should be considered as part of the financial appraisal when presenting the maximum reasonable offer that may affect the viability of future development coming forward i.e. costs associated with listed buildings, ground conditions etc.	No change proposed. This is a level of detail that would normally be justified through a viability appraisal. If there were a need for such specification it might be covered in an SPD. In the future, it is clear that the government intend a more detailed specification for viability appraisals and assumptions as indicated in their 2018 consultation on Draft Planning Practice Guidance for Viability. This is too detailed for a local plan policy.
Unite Students	Policy H3	<p>H3: Affordable Housing - The draft Local Plan refers to the Affordable Housing Supplementary Planning Document (SPD) (2013) states that the requirement to contribute to affordable housing provision will not be applied to student accommodation unless this is being developed on an allocated housing site or a on a site where residential development would have been anticipated. It goes on to state that the following types of residential development will be exempt from the requirement to provide affordable housing:</p> <ul style="list-style-type: none"> • Replacement of a single dwelling with another single dwelling; and • Conversion of a dwelling to self-contained flats where there is no new floorspace. <p>We believe that the development of PBSA will in turn free up more family sized homes and thus have a positive benefit on housing supply and affordability. We recommend the following amendments to the supporting text of Draft Policy H3: Affordable Housing</p> <ul style="list-style-type: none"> • Student Housing should be added to the bulleted list of residential developments that are exempt from the requirement to provide affordable housing. 	<p>No change proposed. The Council’s approach, as set out in its Affordable Housing SPD, is that “The policy will not be applied to student accommodation unless this is being developed on an allocated housing site or a site where residential development would have been anticipated.” (paragraph 4.2). With the continued loss of residential sites to student accommodation, it is not considered appropriate to relax this requirement.</p> <p>Student housing is not C3 residential However, as discussed under other policies in the plan, there is growing concern at the amount of proposals for student accommodation coming forward often at the expense of sites that will be appropriate for the provision of housing that would not only meet the high levels of need for housing but which would also contribute to the provision of affordable housing for which there is such a priority need.</p>
University of	Policy H3	Policy H3: The University maintains the support in principle for draft	No change proposed. The text refers to the

Reading		Policy H3 concerning affordable housing, as stated in former representations. The University does however wish to reiterate that there remains no mention of Starter Homes. The Housing White Paper (2017), whilst not imposing a statutory requirement, encourages local planning authorities to include Starter Homes within affordable housing requirements.	proposed changes to the affordable housing definition, which may require an updated SPD. However, in advance of any changes, the Council does not consider that Starter Homes respond in any meaningful way to the identified affordable housing need. It has no reason to promote such housing at the expense of other, much more valuable forms of affordable housing in terms of the identified needs of the area. The NPPF does not define Starter Homes as affordable housing. It is noted that the Draft Revised NPPF does include Starter Homes within its definition of affordable housing, noting that it is for households on incomes of less than £80,000. Nevertheless, the Local Plan has been drafted in the context of the NPPF and the content of the NPPF, including the definition of affordable housing will be a material consideration in the determination of planning applications.
Bracknell Forest Council	Policy H4	Bracknell Forest Council has no comments to make on new policy H4 (build-to-rent schemes).	Noted. No change needed.
Lochailort Reading Limited	H4: Build to Rent Schemes	Lochailort Reading Ltd has been working closely with the Local Planning Authority over the past two years on what is the first—and currently the only—purpose-designed Build-to-Rent development in the Borough. We have an excellent understanding of this emerging tenure, having sought extensive advice from leaders in the sector such as Paul Belson (author of the <i>PRS Market Report</i> submitted with application and former member of the Government’s Build-to-Rent Task Force), CBRE (international property consultants with a dedicated Build-to-Rent in-house team) and CallisonRTKL (award-winning architects who specialise in designing bespoke Build-to-Rent schemes). Our recently-approved <i>Thames Quarter</i> development, specifically referred to in the Pre-Submission Draft Local Plan, sets a new benchmark for Build to Rent	No change proposed. Build to rent is a new form of tenure for the UK where institutions have not often got involved in owning housing developments. Inevitably evidence and precedent is limited. Any authority seeking to compose a policy for Build to Rent is therefore testing the applicability and realism of the policy. Reading Borough Council has indeed dealt with Lochailort over a period to grant permission for a Build to Rent scheme at Napier Road. As part of that, and in developing this policy, officers spoke

	<p>developments in Reading. The quality of the scheme is a reflection of the detailed research that informed its design, which has been confirmed to us as being fit for purpose and an exemplar of its kind. Consequently, we are particularly well placed to make comment on the draft Build to Rent policy in the <i>Pre-Submission Draft Local Plan</i>, which we are concerned sets requirements that will not only deter Build to Rent investment in the town but may well render further future schemes un-fundable and unviable. For the reasons that we set out in our attached submission, the draft plan cannot be found sound without a number of modifications to the proposed Build to Rent policy. We have set out our recommended modifications and ask that the Local Planning Authority adopts these before submitting the draft Plan to the Secretary of State for examination. We would be happy to meet to discuss our concerns and recommended amendments if this would assist. This representation relates to Policy H4: Build to Rent Schemes. We do not consider the Local Plan to be legally compliant or sound. We believe that it fulfils the duty to co-operate. Whilst the Local Planning Authority’s support in principle for Build to Rent developments is welcomed, the requirements in the draft Policy H4 render the policy unsound for reasons of viability and the absence of an evidential basis. The draft Policy is a late addition to the draft Local Plan. It did not appear in any of the previous consultation versions of the Plan and has not been subject to any public consultation other than at this very late pre-submission stage. Consequently, the evidential basis for some of the draft Policy’s requirements is absent and the lack of proper prior consultation with interested parties further undermines the vague or generalised assertions in both the draft Policy and its supporting text.</p> <p>Specifically: 1. The proposed minimum 30-year term for which a Build to Rent development must be retained in a single ownership and provide solely rented accommodation is excessive and without any evidential justification. This extended minimum term (in excess of an entire generation and almost 40% of the average life expectancy in Reading)</p>	<p>to other local authorities and operators. As a result, the Council is of the view that its policy positions are reasonable and necessary to justify the different policy approach to Build to Rent Schemes.</p> <p>1. Build to Rent is claiming special status as it is a residential development model that has different viability considerations to the usual residential for sale model and, operators will tell you, it doesn’t have the level of viability of residential for sale development. It therefore needs to be treated differently. Hence it has separate government guidance and a separate local plan policy. If such development is to be treated differently to other models of residential development, it needs to show that its benefits</p>
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		<p>may fetter the ability of institutional investors to incorporate Build to Rent investments into their wider investment strategies, thus stifling the investment capital essential to such schemes. Whilst the Local Planning Authority may seek the reassurance that Build to Rent schemes will not be broken up and sold on the open market for quick or elevated returns, a more reasonable and appropriate minimum term should be set. A 20-year term was agreed by the Local Planning Authority when it granted planning permission 162166 (Thames Quarter) and there has been no subsequent new evidence or change in national policy to demonstrate that a longer term is necessary. Indeed, by way of comparison, the <i>Homes for Londoners Supplementary Planning Guidance</i> document published by the Mayor of London (August 2017) looks for a minimum 15-year period as a matter of <i>guidance</i>, not <i>adopted policy</i>. For all these reasons, draft Policy H4 is unsound.</p> <p>2. The draft policy requirement of a minimum tenancy term of 3 years with a six month break clause in the tenant’s favour and structured/limited in-tenancy rent increases agreed in advance is wholly unjustified and has evidential basis. There is no evidence whatsoever in the <i>Berkshire (including South Bucks) Strategic Housing Market Assessment</i> or in the <i>Housing Implementation Strategy</i> to substantiate such an onerous requirement, with the draft Local Plan’s evidence base containing no evidence whatsoever that short tenancy periods are a social or economic issue in Reading. Whilst it is in the institutional investor’s interests to maximise a Build to Rent development’s occupancy rates, site-specific tenancy policies must remain a matter for commercial consideration and control by the operator. Equally, as with all forms of market housing, pricing is not a matter within which the Local Planning Authority has any legal authority to intervene. Whilst rental controls are appropriate in respect of affordable housing, it is not for the Local Planning Authority to seek to extend those controls to market housing. For all these reasons, draft Policy H4 is both unsound and not legally compliant.</p>	<p>will last, if not for the length of life of the building/development, at least for a reasonable length of time. In the view of Reading Borough Council, that means that the benefits of such development need to be in place for a period of at least 30 years, otherwise any planning gain or contributions that would have pertained via a different model of development should fall due. Otherwise the product will be perceived as a back door means to avoid full policy compliance and the full costs of development under planning policy with the ability to sell on and realise significant profits within a very short time at the expense of providing essential policy requirements such as affordable housing.</p> <p>2. Build to Rent is claiming special status as it is a residential development model that has different viability considerations to the usual residential for sale model and, operators will tell you, it doesn’t have the level of viability of residential for sale development. It therefore needs to be treated differently. Hence it has different government guidance and a separate local plan policy. However, if such development is to be treated differently, it needs to demonstrate that is providing the benefits that it says it brings, one of which is longer tenancies for residents. If it is not providing longer tenancy terms and thus societal and planning benefits for the operation of the private rented market, what is the point of treating it as having special status.</p>
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	<p>3. We have no comment to make on the draft policy requirement that a high standard of professional on-site management and control of the accommodation should be provided.</p> <p>4. The requirement for Build to Rent developments to meet Reading Borough Council's <i>Rent with Confidence Standards</i> is wholly inappropriate. Those standards are not contained within an adopted Supplementary Planning Guidance document, but rather provide a voluntary framework which has no legal basis. They have not been subject to the necessary minimum level of documented public consultation and have not been subject to any independent examination. The draft policy requirement for compliance with such an evidently non-statutory document renders draft Policy H4 unsound.</p> <p>5. We have no comment to make on the draft policy requirement to provide for a mix of unit sizes in accordance with Policy H2.</p> <p>6. We have no comment to make on the draft policy requirement to meet the standards of design set out in Policy H4.</p> <p>7. The draft policy requirement to provide 30% on-site affordable housing (either in accordance with Policy H2 and any relevant Supplementary Planning Document or in the form of Affordable Private Rent Housing as defined and set out in a relevant Supplementary Planning Document) does not make any reference to scheme viability testing. It is therefore not compliant with <i>National Planning Policy Framework</i> paragraph 173. The financial viability model that underpins commercial investment appraisal of a Build to Rent scheme is entirely different to traditional building-to-sell housing or apartments. The draft policy's expectations must be adjusted accordingly in order to provide the necessary certainty to investors, requiring a recalibration of the approach to financial viability and assessing Build to Rent proposals based on the longer term operational net income stream generated by the asset combined with a reversionary value based on the valuation of net receipts from the asset via investment sale or a unit disposal programme. This distinction is recognised in both the <i>National Planning Practice Guidance</i> and the RICS Information Paper <i>Valuing Residential</i></p>	<p>4. The Rent with confidence standard is a basic set of letting standards that sets out criteria for landlords and agents to provide tenants with good quality accommodation and good property management services. It only defines what service a good landlord will provide to tenants. Again, Build to Rent is seeking special status on the basis that it provides high levels of landlord services and all this element of the policy does is provide a very basic set of standards by which Build to rent Schemes can demonstrate the benefits to tenants that operators say such housing will bring to the market.</p> <p>7. Policy H4 makes reference to Policy H2. This has now been corrected to refer to Policy H3. Policy H3 states, "<i>In all cases where proposals fall short of the policy target 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.</i>" Paragraph 4.4.20 indicates that, "<i>On-site provision (serviced land or completed units) of affordable housing will always be sought in the first instance. Where there are exceptional reasons, the provision of surrogate sites (serviced land or completed units) or commuted sums that will enable the provision of a commensurate number and mix of affordable units, will be considered.</i>"</p>
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		<p><i>Property Purpose Built for Renting</i> (1st edition, Sept 2014). The absence of reference to viability testing in the draft policy text, and the lack of flexibility within the policy in terms of acceptable solutions, renders draft Policy H4 unsound. Furthermore, in light of accepted need for flexibility with Build to Rent schemes compared to traditional “for sale” developments, the lack of reference in the draft Policy to offsite provision on surrogate sites or the potential ability for an applicant to agree a financial contribution in lieu of onsite provision may render any future such development unviable. Consequently, the lack of flexibility in the draft policy in respect of allowable affordable housing solutions renders Policy H4 unsound. In order to remedy the soundness and legal non-conformity issues identified above, Policy H4 should be amended to read as follows: “Planning permission will be granted for developments of self-contained, private rented homes which: 1. Are secured in single ownership providing solely for the rental market for a minimum 30 20 year term <i>from the date of first occupation</i> with provision for clawback of affordable housing contributions should the covenant not be met; and 2. Provide tenancies for private renters for a minimum of three years with a six month break clause in the tenant’s favour and structured and limited in tenancy rent increases agreed in advance; and 3. 2. Provide a high standard of professional on-site management and control of the accommodation; and 4. Meet Reading Borough Council’s Rent with Confidence Standards; and 5. 3. Provide for a mix of unit sizes in accordance with Policy H2; and 6. 4. Meet the standards of design set out in Policy H4; and 7. 5. <i>Subject to viability, provide 30% on-site affordable housing, either in accordance with Policy H2 and any relevant Supplementary Planning Document; or in the form of Affordable Private Rent Housing as defined and set out in a relevant Supplementary Planning Document. This may be provided onsite in the form of Affordable Private Rent Housing, offsite at a surrogate site elsewhere in the Borough, or by way of a commuted sum.</i></p> <p>We do not wish to appear in person at the public examination.</p>	<p>Subject to the minor corrections made to ensure that cross referencing is accurate, the Council remains of the view that policy H4 is sound and appropriate in relation to the special status that promoters of Build to Rent schemes are seeking to bring forward such developments in Reading.</p>
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<p>Ropemaker Properties, Ltd</p>	<p>Policy H4</p>	<p>Policy H4: Build-to-Rent Schemes – We do not consider that this policy is legally compliant, sound, or fulfils the duty to co-operate. This policy is considered to be overly onerous and will ultimately prevent build-to-rent developments coming forward. The recently published Government White Paper ‘Fixing our Broken Housing Market’ is clear that there is a need to diversify the housing market including introducing build-to-rent. The policy sets out a number of criteria which need to be met as part of the policy and the following comments can be made:</p> <p>1. <i>“Are secured in single ownership providing solely for the retail market for a minimum 30-year term with provision for clawback of affordable housing contributions should the covenant not be met; and”</i></p> <p>There are two elements to the first point: Firstly, the issue of single ownership. Many build-to-rent schemes are owned by funds and smaller funds are beginning to go into partnership to be able to invest in build-to-rent. It is therefore suggested that the policy could state ‘single entities’ rather than single ownership. The second element is the restrictive covenant which seeks sites to remain in the rental market for a period of 30 yrs. There is no evidence provided within the supporting documentation as to why this period has been chosen. We generally find that a restrictive covenant of 7 years is suitable with a maximum of 10 years. Any period beyond this and developers are struggling with a maximum of 10 years. Any period beyond this and developers are struggling to secure financing for developments. It needs to be acknowledged that the build-to-rent market is still emerging and as such policies need to be flexible enough to accommodate a changing market. The PPG does not specify any specific timescales for a minimum period of time and indeed suggests that each scheme should be determined on a case by case basis to each scheme remains viable. As a result, the policy should be amended to require a minimum term to be agreed with the applicants.</p> <p>2. <i>Provide tenancies for private renters for a minimum of three years</i></p>	<p>No change proposed</p> <p>1. Build to Rent is claiming special status as it is a residential development model that has different viability considerations to the usual residential for sale model and, operators will tell you, it doesn’t have the level of viability of residential for sale development. It therefore needs to be treated differently. Hence it has separate government guidance and a separate local plan policy. If such development is to be treated differently to other models of residential development, it needs to show that its benefits will last, if not for the length of life of the building/development, at least for a reasonable length of time. In the view of Reading Borough Council, that means that the benefits of such development need to be in place for a period of at least 30 years, otherwise any planning gain or contributions that would have pertained via a different model of development should fall due. Otherwise the product will be perceived as a back door means to avoid full policy compliance and the full costs of development under planning policy with the ability to sell on and realise significant profits within a very short time at the expense of providing essential policy requirements such as affordable housing. The period of 30 years follows the policy requirement in the Draft Southwark Local Plan that has been submitted to the Secretary of State.</p> <p>2. If such development is to be treated</p>
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		<p><i>with a six-month break clause in the tenant's favour and structured and limited in-tenancy rent increases agreed in advance; and</i></p> <p>This is overly restrictive and looks to control the market. The policy should be flexible enough for a length of tenancy to be mutually agreed between the landlord and tenant. Whilst it is acknowledged that some people will want a long-term tenancy there are others who would be looking for a shorter term. It is most likely that build-to-rent schemes will be located in the centre of Reading which is likely to have a large number of professionals who would want a shorter-term tenancy. This appears to be straying into property law rather than planning policy.</p> <p>3. <i>Provide a high standard of professional on-site management and control of the accommodation; and</i></p> <p>It is agreed that build to rent schemes should provide high quality accommodation, but it is not entirely clear how this will be enforced.</p> <p>4. <i>Meet Reading Borough Council's Rent with Confidence Standards; and</i></p> <p>This appears to be linked to point 3 above, and it is agreed that build-to-rent schemes should provide high-quality accommodation.</p> <p>5. <i>Provide for a mix of unit sizes in accordance with Policy H2;</i></p> <p>This is not entirely clear, policy H2 sets out a mix requirement, which differs from that set out in policy CR6 within the centre of Reading. As has been set out above, the mix within developments should be flexible enough to take into account the constraints of the site and market conditions at the time an application is made.</p> <p>6. <i>Meet the standards of design set out in Policy H4; and</i></p> <p>Clearly there is a typo here, as the wrong policy is referenced. It is therefore not possible to make comment on this.</p> <p>7. <i>Provide 30% on-site affordable housing, either in accordance with Policy H2 and any relevant Supplementary Planning Document; or in the form of Affordable Private Rent Housing as defined and set out in a relevant Supplementary Planning Document.</i></p> <p>It is agreed that build-to-rent schemes should provide affordable</p>	<p>differently, as a special case, it needs to demonstrate that is providing the benefits that it says it brings, one of which is longer tenancies for residents. If it is not providing longer tenancy terms and thus societal and planning benefits for the operation of the private rented market, what is the point of treating it as having special status? One would assume that there would still be break clauses within a 3 year tenancy that would allow tenants to stay for shorter periods.</p> <p>Noted. That omission has been corrected. The Submission version refers to H2 or CR6.</p> <p>A correction has been made to the cross referencing.</p> <p>A correction has been made to the cross</p>
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		<p>housing in line with policy. There is a typo within the policy as it assumed that this is in relation to policy H3. This clearly needs to be subject to viability and the associated costs with bringing a site forward, particularly a brownfield site.</p> <p>There is no definition within the documents on what is ‘Affordable Private Rent Housing.’ If this allows for increased flexibility within the affordable housing offer, then this is welcomed. Additionally,</p> <ul style="list-style-type: none"> • Positively prepared – it is acknowledged that this policy seeks to provide guidance for build-to-rent, however the policy appears to be restrictive rather than encouraging of this emerging sector of development. • Justified – As has been set out above, there appears to be no evidence provided to set out why restrictive covenants should be placed on a permission for 30 years, nor why tenants should be required to sign up for three years. The only example of build-to-rent currently in Reading is the recently permitted former BMW site which only has a covenant of 20 years and no requirement for minimum tenancy period. The detail within this policy is therefore unjustified and untested. • Effective – By setting overly onerous requirements for build-to-rent, it is unlikely to meet Government objectives. • Consistent with National Policy – The policy is not considered to be consistent with National Policy. The NPPF requires the Local Plan to be built on an evidence base, and there appears to be no evidence to support the wording within this policy. The PPG suggests that LPA can explore putting minimum time limits on these schemes, but this is not a specific requirement. 	<p>referencing. Viability is referred to in Policy H3.</p> <p>In the governments consultation document, “Planning and Affordable Housing for Build to Rent” (February 2017), the reference to affordable housing refers to Affordable Private Rent – “this will be the normal vehicle for providing the affordable homes element in schemes (as opposed to other forms negotiated through S106).” Policy H4 acknowledges that institutions managing Build to Rent Products will usually want to manage any affordable housing and accept that this might be in the form of Affordable Private Rent as defined in future guidance.</p> <p>As indicated, this is an emerging sector seeking special status. The Council’s policy response is positive in that it seeks to enable the provision of such housing subject to realising the benefits it supposedly brings (and there are no examples yet in Reading). It ensures that any provisions relating to the special status such developments seek by way of not fully complying with policy requirements does not undermine the other policies in the local plan.</p>
Stanhope Plc	Policy H4: Build to Rent Schemes	Stanhope Plc supports the inclusion of this policy in principle. It is encouraging that the Council is recognising the contribution that Build to Rent (“BtR”) schemes can make in accelerating housing delivery, reflecting the policy support at national level. In terms of the detailed requirements of draft Policy H4, we set out below specific comments	No change proposed. Build to Rent is claiming special status as it is a residential development model that has different viability considerations to the usual residential for sale model and, operators will tell you, it doesn’t have the level

		<p>and suggested amendments (using the policy numbering for consistency):</p> <p>1. The proposed 30 year covenant term is considered unduly restrictive given the recent emergence of BtR as a housing product and its relatively immature position in the market. We would suggest a minimum 15 year period is more appropriate. The key driver for a 15 year covenant (which is also identified in the draft London Plan, preparation of which is similarly advanced when compared to Reading's new Local Plan), relates to attracting large-scale institutional investment into the sector and the type of investment horizons that the funds operate off. The primary concern of including a covenanted period longer than 15 years would be that it would deter investment and funds would be redirected into other assets, and in other locations. It is noteworthy that the recently approved BtR scheme at Kings Meadow / Napier Road is subject to a 20 year covenant period. Paragraph 4.4.32 should also be updated accordingly.</p> <p>6. We presume the reference to Policy H4 should in fact be Policy H5 (Standards for New Housing).</p> <p>7. We presume the reference to Policy H2 should in fact be Policy H3 (Affordable Housing). In addition, although it is referenced in Policy H3, it should be made clear here that affordable housing provision within BtR schemes will be subject to viability testing. Furthermore, it is widely recognised that flexibility needs to be applied when considering BtR developments, that in order to maintain the integrity of a unified ownership and management of the homes, the affordable housing provision within a BtR development can be entirely Discounted Market Rent ("DMR") which can be owned, let and managed by the landlord/operator/institution. Draft Policy H4 refers to 'Affordable Private Rent' which should be substituted for DMR, a form of intermediate housing made available for rent at a level at least 20% below market rent (as per the definition being used by Government). The accompanying text should also be clarified insofar as the affordable housing element will be offered as DMR (and not capped at Local</p>	<p>of viability of residential for sale development. It therefore needs to be treated differently. Hence it has separate government guidance and a separate local plan policy. If such development is to be treated differently to other models of residential development, it needs to show that its benefits will last, if not for the length of life of the building/development, at least for a reasonable length of time. In the view of Reading Borough Council, that means that the benefits of such development need to be in place for a period of at least 30 years, otherwise any planning gain or contributions that would have pertained via a different model of development should fall due. Otherwise the product will be perceived as a back door means to avoid full policy compliance and the full costs of development under planning policy with the ability to sell on and realise significant profits within a very short time at the expense of providing essential policy requirements such as affordable housing. The period of 30 years follows the policy requirements in the Draft Southwark Local Plan that has been submitted to the Secretary of State.</p> <p>6. A correction has been made to the cross referencing.</p> <p>7. Viability is referred to in Policy H3.</p> <p>In the governments consultation document,</p>
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		<p>Housing Allowance levels); therefore allocation of eligible households would not come from Reading’s social housing waiting list, but could come from an intermediate housing waiting list, which is the approach being taken elsewhere, e.g. Southwark.</p>	<p>“Planning and Affordable Housing for Build to Rent” (February 2017), the reference to affordable housing refers to Affordable Private Rent – “this will be the normal vehicle for providing the affordable homes element in schemes (as opposed to other forms negotiated through S106).” It has a significant section headed “Affordable Private Rent”. It also makes reference to encouraging an alternative approach to affordable housing for Build to Rent called Affordable Private Rent (sometimes referred to as Discounted Market Rent). While it might be referred to as Discounted Market Rent, it is clear that the government wishes it to be known as Affordable Private Rent.</p>
<p>Viridis Real Estate Services Ltd</p>	<p>Policy H4</p>	<p>Policy H4: Build to Rent Schemes - Our client welcomes the introduction of a policy to support the private rental sector (PRS), the principle of which responds to comments made in their FDLP response. However, the details of the policy are concerning and there is no evidence base, local, or otherwise, underpinning its requirements. Criterion 1 of Policy H4 seeks to impose a covenant on any PRS scheme which will require the development to be retained in single ownership solely for the rental market for a minimum period of 30 years. In the event that the covenant is not met the policy makes provision for a clawback of any affordable housing contributions. There is no national policy or evidential foundation for the requirement of a covenant, let alone one that exceeds 30 years. The Government has highlighted its commitment to the PRS and in its <i>‘Housing White Paper’</i> (February 2017) confirmed its intention to amend the NPPF to ensure that Councils plan proactively for the PRS and to make it easier for PRS developers to offer affordable private rental products as part of their affordable housing contribution. At the same time the Government has consulted on its <i>‘Planning and Affordable Housing for Build to Rent’</i> paper which sought views on</p>	<p>No change proposed. Build to Rent is claiming special status as it is a residential development model that has different viability considerations to the usual residential for sale model and, operators will tell you, it doesn’t have the level of viability of residential for sale development. It therefore needs to be treated differently. Hence it has separate government guidance and a separate local plan policy. If such development is to be treated differently to other models of residential development, it needs to show that its benefits will last, if not for the length of life of the building/development, at least for a reasonable length of time. In the view of Reading Borough Council, that means that the benefits of such development need to be in place for a period of at least 30 years, otherwise any planning gain or contributions that would have</p>

		<p>planning measures to support an increase in build to rent schemes. Although this paper was for consultation purposes only, the government made clear its position on the use of covenants in relation to PRS schemes, stating on page 24 that: <i>“The Government is aware of an emerging practice whereby Build to Rent schemes enter into a covenant with local authorities to remain in the Private Rented Sector for a minimum period, e.g. 15 years. The Government has considered this issue and:</i></p> <ul style="list-style-type: none"> • <i>Recognises that Build to Rent schemes are different, in viability terms (as already referenced in planning guidance) and that local authorities want to be reassured about the purpose of the development in order to take this into account in viability calculations;</i> • <i>Does not think it necessary to specify a minimum covenant period for homes to remain in the Private Rented Sector at a time when investors may still need an exit route (particularly in locations where the market for Build to Rent is not yet proven);</i> • <i>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).”</i> <p>On this basis, we would challenge the justification for imposing covenants on build to rent schemes and given the clear position of the government it is very possible that Policy H4 as presently drafted would conflict with any emerging NPPF updates relating to the private rental sector. Notwithstanding the above, in relation to the proposed duration of the covenant there is again no evidence to support the Council’s approach. The Greater London Authority has significant experience in plan making and decision taking in relation to build to rent schemes. Its <i>‘Homes for Londoners’</i> document (August 2017)² states at paragraph 4.12 that covenants should be a minimum of 15 years. This approach has followed through into the Mayor’s Draft London Plan (December 2017), specifically draft Policy H13, and been adopted by the London</p>	<p>pertained via a different model of development should fall due. Otherwise the product will be perceived as a back door means to avoid full policy compliance and the full costs of development under planning policy with the ability to sell on and realise significant profits within a very short time at the expense of providing essential policy requirements such as affordable housing. The period of 30 years follows the policy requirement in the Draft Southwark Local Plan that has been submitted to the Secretary of State. It is clearly necessary to avoid the perverse incentives referred to in the quotation provided in the representation.</p> <p>Decision-taking in relation to the Lochoilort scheme came after 2 years of negotiation and within a policy vacuum that we are now seeking to rectify through a new local plan policy. The council remains of the view that the longer period of 30 years is more appropriate to avoid the perverse incentives referred to in the government consultation.</p>
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		<p>Boroughs in determining planning applications for build to rent proposals. More locally, the planning permission at the Former Cooper BMW garage on Kings Meadow Road (reference 162166/FUL) was for a 100% PRS development and a 20 year covenant was secured in the associated Section 106 Agreement. Although for the reasons set out earlier we do not agree with the principle of imposing a covenant, there is a clear inconsistency between the Council’s approach to decision taking and plan making. On the basis that the government has been clear that there should be no barriers to the PRS, that development plan policies should be deliverable, and that there is no evidence to support the use of a 30+ year covenant, we conclude that there is no justification to follow a different approach to the GLA and therefore a 15 year covenant would be more reasonable. On this basis Policy H4 does not meet the following tests of soundness:</p> <ul style="list-style-type: none"> • positively prepared; • justified; • effective; and • consistent with national policy. <p>We would therefore request that Policy H4 be amended to omit any reference to ownership covenants and that any clawback requirement is capped at 15 years. <i>“Planning permission will be granted for developments of self-contained, private rented homes which:</i></p> <ol style="list-style-type: none"> 1. <i>Are secured in single ownership providing solely for the rental market for a minimum 30 year term with provision for clawback of <u>Secure a clawback mechanism to enable additional affordable housing contributions to be recouped in the event that private rented homes are sold during the first 15 years following first occupation and that this has increased the viability of the scheme. Any additional affordable housing contribution will be capped at 30% overall in accordance with Policy H3</u>should the covenant not be met; and</i> 2. <i>Provide tenancies for private renters for a minimum of three years with a six month break clause in the tenant’s favour and</i> 	<p>The Council remains of the view that policy H4 as drafted is sound and appropriate in relation to the special status that promoters of Build to Rent schemes are seeking in bringing forward such developments in Reading.</p>
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		<p><i>structured and limited in-tenancy rent increases agreed in advance; and</i></p> <ol style="list-style-type: none"> 3. <i>Provide a high standard of professional on-site management and control of the accommodation; and</i> 4. <i>Meet Reading Borough Council's Rent with Confidence Standards; and</i> 5. <i>Provide for a mix of unit sizes in accordance with Policy H2; and</i> 6. <i>Meet the standards of design set out in Policy H4; and</i> 7. <i>Provide 30% on-site affordable housing, either in accordance with Policy H2 and any relevant Supplementary Planning Document; or in the form of Affordable Private Rent Housing as defined and set out in a relevant Supplementary Planning Document."</i> 	
Environment Agency	Policy H5	H5: We are pleased to see that point b of this policy refers to the 'higher water efficiency standard' to be used for new dwellings which is 110/l/p/d in the Building Regulations Approved document Part G.	Noted. No change needed
Gladman Developments	Policy H5	Policy H5 – unsound (Justified, consistent with National Policy). The Council's evidence does not include a viability assessment that tests the implications of the proposed policies within the local plan in line with Paragraph 173 of the NPPF. The absence of this work means that it is not possible for interested parties to assess whether policies are justified, effective or consistent.	No change proposed. A Viability Assessment has been undertaken and included within the evidence base, which demonstrates that the requirements of the Local Plan will not render development unviable.
Hermes Property Unit Trust	Policy H5	Policy H5 – We wish to object to point c in relation to 'all major new-build residential development being designed to achieve zero carbon homes.' We do not consider this should be included within the policy given the introduction of new technical standards in 2015 following the withdrawal of the Code for Sustainable Homes. Technical requirements in this regard are covered within the Building Regulations and the Local Plan should not seek to include any additional technical standards relating to construction, internal layout or performance of new dwellings. To do so could result in a conflict between the Local Plan and the Building Regulations. We, therefore, consider that this part of the policy should be removed given it is not justified or consistent with	No change proposed. We recognise the content of the Ministerial Statement in 2015 which states that there should not be additional technical standards. However, we also recognise the NPPF's requirement that local authorities should "adopt proactive strategies to mitigate and adapt to climate change" (94) and "plan for new development in locations and ways which reduce greenhouse gas emissions" (95). Having been through the courts in relation to another ministerial statement, on securing affordable

		national policy (NPPF paragraph 182).	<p>housing on small sites, we are also aware that such ministerial statements should not have the effect of overriding justified local policies.</p> <p>The full background to the proposed zero carbon homes requirements are set out in the Local Plan Background Paper. In summary, the overwhelming need to tackle climate change, the commitments made to carbon footprint reduction in the Climate Change Strategy, and the fact that zero carbon homes can be viably delivered in Reading have led to the policy position taken.</p>
Home Builders Federation	Policy H5	<p>H5: Standards for new housing - Parts of this policy are unsound as they are unjustified and inconsistent with national policy. PPG has established the optional technical standards that can be applied via a local plan where there is sufficient evidence to support their introduction. This policy establishes the Council’s intentions to apply these optional technical standards and set out below are our comments on each of these. <i>Space standards (Part a)</i> – Paragraph 56-020 of PPG sets out that local planning authorities will need to justify the application of internal space standards. In justifying this policy, the council will need to take in to account:</p> <ul style="list-style-type: none"> • Need – evidence should be provided on the sizer and type of dwelling currently being provided • Viability – the impact of adopting space standards should be considered as part of the place viability assessment • Timing – whether a transitional arrangement is required to enable any additional cost arising from space standards to be factored into future land acquisitions. <p>At present no relevant evidence has been supplied by the Council supporting the introduction of space standards. The Council has raised a concern that developments coming forward under permitted</p>	<p>No change proposed.</p> <p><i>Space standards</i> – the evidence to support the policy approach is set out in the Local Plan Background Paper. The circumstances where space standards would be difficult to achieve are limited to the centre of Reading, which is therefore excluded from the requirement. Elsewhere, this is physically achievable, and the delivery of homes with adequate internal space should have no detrimental impact on viability.</p> <p><i>Zero carbon homes</i> - We recognise the content of the Ministerial Statement in 2015 which states that there should not be additional technical standards. However, we also recognise the NPPF’s requirement that local authorities should “adopt proactive strategies to mitigate and adapt to climate change” (94) and “plan for new development in locations and ways which reduce</p>

		<p>development are bringing forward units below space standards but as they point out this could not be addressed through such a policy. However, the Council have not published any evidence that the size of new homes being built in the Borough is below space standards. So, whilst it may be a concern it is one that is not supported by any evidence. At the time of writing the Council has also not produced any viability evidence to support the introduction of space standards. As there is no assessment as to the impact on the plan viability, as required by PPG, the policy cannot be considered to be sound.</p> <p><i>Zero carbon homes and dwelling emissions rates (part c and d.)</i> - Whilst the HBF does not generally object to local plans encouraging developers to improve energy efficiency as part of a scheme and to minimising resource use in general it is important that this is not interpreted as a mandatory requirement. This would be contrary to the Government’s intentions, as set out in ministerial statement of March 2015, the Treasury’s 2015 report ‘Fixing the Foundations’ and the Housing Standards Review, which specifically identified energy requirements for new housing development to be a matter solely for Building Regulations with no optional standards. The Deregulation Act 2015 was the legislative tool used to put in place the changes of the Housing Standards Review. This included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than Building Regulations energy efficiency standards for new homes. In order to make this policy sound parts c and d should be removed.</p> <p><i>Accessible homes (part e and f)</i> – We do not consider the Council to have justified the requirement for all homes to be built to part M4(2) and for all of market homes and 5% of homes on sites of 20 or more dwellings to be built to part M4(3). Paragraph 56-007 requires local authorities to demonstrate the need for these requirements to be applied to new homes. This evidence should include the likely future need for housing for older and disabled people, the accessibility and</p>	<p>greenhouse gas emissions” (95). Having been through the courts in relation to another ministerial statement, on securing affordable housing on small sites, we are also aware that such ministerial statements should not have the effect of overriding justified local policies.</p> <p>The full background to the proposed zero carbon homes requirements are set out in the Local Plan Background Paper. In summary, the overwhelming need to tackle climate change, the commitments made to carbon footprint reduction in the Climate Change Strategy, and the fact that zero carbon homes can be viably delivered in Reading have led to the policy position taken.</p> <p><i>Accessibility</i> – the evidence to support the policy approach is set out in the Local Plan Background Paper. Accessible and adaptable homes involve fairly simple design measures that, when included at the outset, should have little impact on viability. The whole rationale behind accessible and adaptable homes is that they are capable of adaptation as circumstances change, without a need to move home, and this could therefore apply to any home. The homes will exist well beyond the period covered by the SHMA, and an ageing population is likely to be an issue throughout the lifetime of the buildings.</p>
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		<p>adaptability of existing stock, the different needs across tenure and the overall impact on viability. It is therefore incumbent on the Council to provide a local assessment evidencing the specific case for Reading which justifies the inclusion of optional higher standards for accessible / adaptable homes in policy H5. The Council's only evidence would appear to be set out in latest SHMA. This document acknowledges that there is likely to be increase in older people across the HMA. However, it is notable that Reading's increase in its population of older people of 63.5%, as set out in table 110 of the SHMA, is lower than its neighbours, and that at 14.9% it has the lowest proportion of older person only households. These trends are also lower than for the South East in general where the population of older people is expected to grow by 64.7% and the proportion older person only households is 21.9%. The Council's evidence on its ageing population is therefore not unusual and is not a phenomenon specific to Reading. As such it does not justify all new homes being built to part M4(2). Most pertinently the SHMA identifies in table 114 that by 2036 there are likely to be 6,254 older people with mobility problems, which is around 20% of the older people population of Reading and about 3.5% of the total population. This suggests that only a relatively small proportion of the population will require homes built to the higher optional standards. If it had been the Government's intention that such generic arguments justified requiring all new homes be built to the higher optional standards for adaptable accessible dwellings then the logical solution would have been to incorporate the standards as mandatory via the Building Regulations, an approach the Government has not taken forward. At present there is no evidence regarding the impact of the policies in the plan on the viability of new development. This is a requirement set out more broadly in the NPPF as well as specifically in relation to the optional standards. With this evidence the policy has not been justified as required by both the NPPF and PPG. We therefore do not consider the requirement for all new homes to be built to part M4(2) of the building regulations to be justified. The proposal to require 5% of homes on developments of 20 or</p>	
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		more dwellings as being M4(3) is contrary to national policy. PPG sets out in paragraph 56-009 that the standard for wheelchair accessible homes only to properties where the local authority is responsible for allocating or nominating a person to live in that dwelling. This means that M4(3) can only be applied to affordable homes and the policy should be amended to reflect this position.	
RBS Pension Trustee, Ltd	Policy H5	Policy H5: Standard of New Housing – Our client supports the Council’s desire to see the delivery of good quality homes in the Borough. As Reading continues to grow, it is important that residents can access an array of housing types and tenures in both central and suburban locations. Construction standards for new housing are principally controlled through building regulations. The New Local Plan identifies a number of additional targets for new homes in Reading such as water efficiency, zero carbon and emissions. While identification of such targets is important, the policy should allow flexibility for schemes that cannot achieve all of the optional targets due to technical or viability considerations.	No change proposed. It is considered that development which complies with the requirements in H5 will generally be viable, and a Viability Assessment has been undertaken to demonstrate that is the case. In any exceptional circumstances where compliance with the policy renders development unviable, this will need to be considered as a material consideration alongside the policy, in line with normal practice.
Reading Climate Change Partnership (RCCP)	Policy H5	H5 – We support proposals for requiring new build housing to meet the higher water efficiency standard. We support proposals for major new-build residential developments to achieve zero carbon homes, together with the proposed contribution towards the cost of carbon offsetting. We would like to see this extended beyond major developments.	Noted. No change needed.
Reading Friends of the Earth	Policy H5	Soundness: This policy is unsound because: <ul style="list-style-type: none"> • It does not require new developments to be prepared to use low-grade heat in the future, if at present only conventional heat sources are judged viable. • The reduction targets below building regulations are not sufficiently deep because it becomes increasingly difficult to save energy by post-build improvements. For long-term economic and environmental sustainability bigger savings must be designed-in as it will not be possible to make the necessary savings later on. Designed energy reduction measures must deliver those savings and not leave the well-known 	No change proposed. The standards need to be set in recognition of the Ministerial Statement that technical standards should not exceed those optional standards set out at a national level. The Council considers that the zero carbon homes requirement should be an exception to this, but such exceptions need to be fully justified. Commissioning of RBC buildings is not

		<p>“performance gap” that regularly occurs with most standards including building regulations.</p> <ul style="list-style-type: none"> • It does not require developers to take account of lifetime carbon emissions including ‘embodied carbon’. • It does not state that Reading Borough Council will commission buildings to higher standards than allowed by government regulations, delivering the best housing for Council tenants and trailblazing for future standards in accordance with Reading’s ambitions to be a ‘Green Tech’ exemplar City. • It does not address issues around water resources and waste management for new housing <p>Modification: add the following</p> <ul style="list-style-type: none"> • Developments shall future-proof their heating system to allow for low-temperature heat supply from district heating or heat pumps (i.e. by installation of suitably sized underfloor or ‘blown air’ heat exchangers) even if initially gas or direct electric heating is to be used. • In order to achieve the targeted savings developers shall use a robust low energy standard like Passive House. It is important that the standard works in practice and that the gap between design and as built energy savings is eliminated - this is automatic with Passive House. Whatever standard is used developers must validate and verify results against the set targets. • Lifetime carbon emissions – including both embodied and use-phase carbon - shall be assessed using the RICS Whole-Life Carbon Professional Statement method to ensure that the best design choices are being made to minimise climate impacts. • Housing commissioned by Reading Borough Council will conform to Passive House standard or above to provide the best housing for Council tenants, and will be used to demonstrate that this is feasible and affordable. • Developers shall perform Post-occupancy Evaluation to confirm 	<p>appropriate for inclusion within the Local Plan.</p> <p>Water resources are dealt with in EN16 and waste management is dealt with in CC5.</p>
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		<p>that performance is being achieved and to provide evidence that the 'performance in use gap' has been closed.</p> <ul style="list-style-type: none"> • Housing development should include recycling greywater and rainwater harvesting where systems are energy and cost effective. (Text from CC2) • Bin and cycle storage is of an appropriate size and standard for the units proposed and should be located at ground floor level with easy access (Text from H8) • Food Waste recovery and recycling shall be addressed by provision of Macerators. 	
Reading Urban Wildlife Group	Policy H5	<p>Policy H5/CC2</p> <p>Soundness: We agree with Policy H5 requiring higher water efficiency standards under Regulation 36(3) of the building regulations for all new build dwellings, and the requirements for improved emission rates. It is not clear why these standards are not applied to conversions of commercial property to residential. Suggested Modification: either modify Policy H5 parts b and d to include conversions from commercial to residential or change Policy CC2 to state that conversions must reach the standards of new build.</p>	No change proposed. Conversions of existing buildings will find it more difficult to design in water efficiency measures from the outset, particularly where buildings are older. Water efficiency will still be considered as part of applying the BREEAM requirements.
Sonic Star Properties Ltd	Policy H5	<p>Emerging policy H5 requires all new build major residential development to achieve zero carbon homes. Supporting paragraph 4.4.44 sets out that the general target will be a 35% carbon reduction on site with a 'top up' contribution of £1,800 per tonne towards carbon offsetting (calculated as a £60 per tonne over a 30 year period). There are no provisions within this policy to ensure that this is viable and subject to financial analysis. This additional cost for developers will clearly impact on the Residual value and the ability of the site to provide policy compliant affordable housing or other benefits through the s106 route.</p>	No change proposed. A Viability Assessment has been undertaken and included within the evidence base, which demonstrates that the requirements of the Local Plan will not render development unviable.
Thames Water	Policy H5	<p>H5: Standards for New Housing - We would like to support Policy H5, specifically part b and supporting paragraph 4.4.42 which deals directly with water efficiency and the requirement for all new build housing to meet 110 litres per person per day.</p>	Noted. No change needed.

Unite Students	Policy H5	<p>H5: Standards for New Housing - The supporting text of Draft Policy H5: Standard for New Housing sets out the standards for ne build housing. We recommend the following amendments to the supporting text of Draft Policy H5: Standards for New Housing.</p> <ul style="list-style-type: none"> The text should include the clarification that these standards do not apply for student accommodation. 	<p>Agreed. Change proposed. There should be clarification that these standards only apply to C3 residential, and there should also be corresponding clarification in the supporting text to CC2 that the BREEAM standards apply to other forms of residential.</p>
University of Reading	Policy H5	<p>Policy H5: The University considers that this Policy does not have full regard to National Planning Practice Guidance and does not provide evidence to justify (as required) elements of the Policy. This Policy as drafted is therefore considered unsound. The Council would only be justified in applying additional standards with respect of access, water and space standards with full justification. Each section of the Policy will be referred to in turn below:</p> <ul style="list-style-type: none"> Space standards - The PPG at paragraph 020 (Reference ID: 56-020-20150327) sets out the justifications that local planning authorities should account for when considering including internal space standards. These are evidence with regard to need (to fully assess the impacts on adopting space standards), viability (considered as part of the Plan’s viability assessment and impacts on affordability) and timing (consideration of a reasonable transitional period following adoption to allow developers to factor in costs). When reviewed against the above PPG requirements for the inclusion of internal space standards, it is evident that the Council have not based the inclusion of such a requirement on sufficient evidence. Water standards - The Council’s evidence for the inclusion of a water efficiency standard within the Policy cites climate change, that the Thames Water area is classed as a ‘water stressed area’ by the Environment Agency, and that the Thames River Basin Management Plan stresses the importance of demand management in the area. The supporting text to the Pre-Submission Plan at paragraph 4.4.43 states that the tighter standard within Building Regulations is 110 litres per person per 	<p>No change proposed.</p> <p><i>Space standards</i> – the evidence to support the policy approach is set out in the Local Plan Background Paper. The circumstances where space standards would be difficult to achieve are limited to the centre of Reading, which is therefore excluded from the requirement. Elsewhere, this is physically achievable, and the delivery of homes with adequate internal space should have no detrimental impact on viability.</p> <p><i>Water standards</i> – the evidence to support the policy approach is set out in the Local Plan Background Paper. The lower standard of 110 litres/person/day is actually above the equivalent level to what the Council have sought for some years under the Code for Sustainable Homes (105 litres/person/day). By these standards it is not particularly ambitious, and should not in any way present a challenge to builders of new homes.</p> <p><i>Zero carbon homes</i> - We recognise the content of the Ministerial Statement in 2015 which states that there should not be additional technical standards. However, we also recognise the</p>

		<p>day. There is no evidence however that the Council have considered the potential impact on viability and housing supply from such requirements. Therefore, the inclusion of water standards would not comply with PPG guidance.</p> <ul style="list-style-type: none"> • Zero Carbon Homes and Building Emissions - Whilst the University is supportive of improved building efficiency, the inclusion of these standards are not supported by the PPG. Matters of energy efficiency would be a matter solely for Building Regulations and there is no evidence as to why there is a need, or indeed regulation basis, supporting the inclusion of emission standards within the emerging Local Plan. • Accessibility - The Council's evidence appears to amount solely to the SHMA projection for an ageing population, but with no evidenced justification why there would be a need for "all new build housing" to be built in line with Building Regulations (2013) M4(2) or M4(3). In the absence of any evidence to the contrary, it is also evident that the Council has not considered the overall impact on viability as guided by the PPG. Without such evidence, e. and f. of this draft policy should be removed. 	<p>NPPF's requirement that local authorities should "adopt proactive strategies to mitigate and adapt to climate change" (94) and "plan for new development in locations and ways which reduce greenhouse gas emissions" (95). Having been through the courts in relation to another ministerial statement, on securing affordable housing on small sites, we are also aware that such ministerial statements should not have the effect of overriding justified local policies.</p> <p>The full background to the proposed zero carbon homes requirements are set out in the Local Plan Background Paper. In summary, the overwhelming need to tackle climate change, the commitments made to carbon footprint reduction in the Climate Change Strategy, and the fact that zero carbon homes can be viably delivered in Reading have led to the policy position taken.</p> <p><i>Accessibility</i> – the evidence to support the policy approach is set out in the Local Plan Background Paper. Accessible and adaptable homes involve fairly simple design measures that, when included at the outset, should have little impact on viability. The whole rationale behind accessible and adaptable homes is that they are capable of adaptation as circumstances change, without a need to move home, and this could therefore apply to any home. The homes will exist well beyond the period covered by the SHMA, and an ageing population is likely to be an</p>
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			issue throughout the lifetime of the buildings.
Reading Friends of the Earth	Paragraph 4.4.43	<p>Soundness: This is a Plan to 2036 so there should be commitment to carbon reduction beyond the 2020 horizon of Reading's Climate Change Strategy. Modification: Reference should be made to:</p> <ul style="list-style-type: none"> • The Climate Change Act ... and ... • The Climate Change Committee's Carbon Budgets – e.g. 5th Budget 57% reduction by 2030 ... and ... • There should be commitment that Reading's emissions reduction targets will exceed future Carbon Budgets and Building Regulations. 	No change proposed. It is not the place of the Local Plan to set climate change reduction targets, because this needs a holistic view over the whole range of the Council's functions.
Bracknell Forest Council	Policy H6	The intention to provide at least 253 residential care spaces in C2 use (Policy H6) in addition to the overall housing need is welcomed. This appears to meet the need for Reading Borough, as identified in the SHMA.	Noted. No change needed.
Historic England	Policy H8	Policy H8 - Historic England would welcome the addition of a requirement that conversion of listed buildings to residential should not detract from the historic significance of the building, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 the National Planning Policy Framework, particularly as the Plan does not contain a specific policy to guide development affecting listed buildings.	No change proposed. This matter would be adequately covered within policy EN1 and does not need repetition here.
Historic England	Policy H9	Policy H9 - Historic England would welcome the addition of a requirement to Policy H9 that the extension of a listed building or the provision of ancillary accommodation should not detract from the historic significance of the building, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework, particularly as the Plan does not contain a specific policy to guide development affecting listed buildings.	No change proposed. This matter would be adequately covered within policy EN1 and does not need repetition here.
Historic England	Policy H11	Policy H11 - Historic England welcomes the requirement in Policy H11 Development of private residential gardens that the proposal makes a	Noted. No change needed.

		positive contribution to the character of the area as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	
Studios Construction (Reading) Ltd	Policy H12: Student Accommodation	<p>H12: Student Accommodation - The supporting text to the draft policy at 4.4.95 confirms the importance of sufficient student accommodation being provided to enable students to live close to where they study. Paragraph 4.4.96 of the supporting text notes a clear disparity between the SHMA 2016 and more recent evidence from the University. The supporting text to draft policy H12 does not however explore the University's evidence in detail. We note that in fact evidence supplied by the University in relation to a previous planning application, considers licensed HESA data along with University forecasts and submits that there is a calculated demand pool, as of November 2017, of two students to every bed available. This clearly indicates a need for additional accommodation supply to meet demand and currently results in a larger than average proportion of students needing to find accommodation in the private rented sector. Indeed, evidence from previous years has suggested that undergraduates have deferred their place at Reading University or accepted a place at another institution, due to the fact that they have been unable to secure accommodation. We understand that the University have previously noted that large numbers of students have needed to be housed in hotels on a temporary basis during peak times. Information from a previous University application also suggests that, for the last 4 years, there has been a waiting list of over 700 students for bed spaces. Moreover, our client submits that in relation to information concerning their current student accommodation interests, there have been waiting lists noted and consistently demand appears to exceed supply. It is understood that the University distinguishes the private rental sector, relating mainly to Houses in Multiple Occupation (HMO's), from that of private purpose-built student accommodation (PBSA). It is our understanding that even with private sector PBSA, large numbers of students are still forced to</p>	<p>No change proposed.</p> <p>Reading faces an issue of a number of sites, particularly in the town centre, which could be used to meet its very significant needs for general housing, being developed for student accommodation. This negatively affects the ability of the Council to meet housing needs. The needs for student accommodation, in comparison to general housing, are far from clear-cut. The issue is explored in more depth in the Local Plan Background Paper. The proposed approach is felt to be a reasonable approach to try to ensure that housing sites are not lost to another use where need is not as clearly demonstrable and where there are options for providing student accommodation on other sites. There are constraints on existing university sites, but the areas concerned are extremely large, and development has taken place recently and is expected to continue to take place.</p> <p>However, irrespective of the above, policy H12 is not an absolute block on student accommodation, and is careful to include a clause that allows need for student accommodation over and above what can be provided on university and student accommodation sites to be demonstrated.</p>

		<p>look to the local private rental market for accommodation. It can be concluded therefore that unless student accommodation needs are met via dedicated means, the pressure on the housing market will still be applied, reducing the availability of housing for families; the very opposite of Reading Borough Council’s housing objectives for the future. Draft policy H12 concludes that the arising need should be met “...on campus or through reconfiguration and redevelopment of existing halls of residence...” It is unclear however whether the Council have sought the University’s view on this, primarily as to whether there is sufficient land on campus, or sufficient expansion opportunities at existing sites, to facilitate the required amount of new student accommodation. Moreover, it is also unclear whether any such land would not already be safeguarded by the University for the potential future expansion of education facilities. On behalf of our client Studios, we invite the Inspector to consider in detail the exact wording of draft policy H12. We would submit that the following wording would sustainably achieve the need for student accommodation, whilst providing governance for the Borough Council (underlined and italicised where amended): “New student accommodation will be provided on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation, <u>or in other sustainable locations with convenient access via walking, cycling, or public transport modes, to services, facilities and places of study.</u>”</p> <p>Accordance with National and Local Policy – The NPPF paragraph 14 is important and highlights the fact that at the heart of the Framework is a presumption in favour of sustainable development. In addition paragraph 15 of the Framework states: “Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that guide how the presumption should be applied locally.”</p>	<p>The proposed amendment would completely change the nature and meaning of the policy, and would in fact give policy support to the current situation where potential housing sites are being developed for student accommodation.</p> <p>The University’s view on the policy is set out in their representation below.</p> <p>Duty to co-operate matters are dealt with in more detail in the Duty to Co-operate Statement, but in summary, the Council has co-operated with Wokingham on this issue, and has made its likely position clear, and WBC have raised no concerns.</p>
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		<p>Wokingham Development Plan – WBC are currently working on a Local Plan Update which will refine the current Core Strategy from 2006 to 2026, to provide the strategy for the Borough. Currently however the development plan for Wokingham Borough consists of, inter alia, the Core Strategy and the Managing Development Delivery Local Plan. It is noted that two thirds of Reading University’s Whiteknights Campus is located within Wokingham Borough, therefore with regard to draft policies within Reading Borough Council’s Regulation 19 pre-submission Local Plan, it is important to consider whether the document passes the ‘duty to co-operate’ test. With regard to the Wokingham Borough Adopted Core Strategy Development Plan Document (2010), it is noted that whilst reference is made to the University, there is no specific wording in relation to student accommodation and therefore no relative policy. With regard to the Wokingham Borough Adopted Managing Development Delivery Local Plan (2014), the University is referenced in more detail and throughout the document. Policy TB14: Whiteknights Campus is specifically concerned with the University’s main Campus and notes that it “...will continue to be a focus for development associated within the University of Reading”. Whilst therefore our client notes that there are no policies which specifically direct student accommodation, there also appears to be no evidence to suggest that Reading Borough Council has co-operated with Wokingham Borough Council in this regard. Given the local authority boundaries run through the Whiteknights Campus, this would seem imperative to the formation of policy H12. It is considered therefore that Reading Borough Council have failed in their legal obligation to co-operate with their neighbouring authority.</p> <p>Summary - Studios are aware that the purpose of the forthcoming examination is to find out in the Inspectors view, whether or not the plan is sound, legally compliant and fulfils the duty to co-operate. To aid the Inspector and to conclude these representations, we have therefore</p>	
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		<p>provided our conclusions under the 3 tests below.</p> <ul style="list-style-type: none"> • Legal compliance - Studios consider that the plan has been prepared with regard to all relevant legislation and therefore offer no comment. • Soundness - Studios consider that as drafted, the regulation 19 pre-submission draft Local Plan is unsound, in accordance with paragraph 182 of the National Planning Policy Framework 2012. Our client would therefore invite the Inspector to consider the following: <ul style="list-style-type: none"> ○ Positively prepared – as noted within these representations it is considered that, in particular, draft policy H12 restricts development which would otherwise be considered sustainable and is therefore not consistent with achieving sustainable development. The plan has therefore not been positively prepared. ○ Justified - as noted within these representations, particularly in relation to draft policy H12, it is not considered that the sustainability appraisal accurately assesses the alternative options. Moreover, it is further considered that the conclusions of the sustainability appraisal differ from the final wording of draft policy H12. The plan is not therefore justified. ○ Effective – our client considers that the objectives of the plan are not deliverable, based on the identified shortfalls in relation to draft policy H12. Moreover, as noted within these representations, the Local Plan contradicts itself within its own policies and as a result the delivery of certain other policies is also questionable. The plan is therefore not effective. ○ Consistent with national policy – for the reasons set out in these representations the plan does not enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. 	
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		<p>The plan is therefore not consistent with national policy.</p> <p>Duty to co-operate - Studious consider that based on an assessment of the draft Local Plan, there is no evidence to suggest that Reading Borough Council have co-operated with Wokingham Borough Council and therefore it is submitted that Reading Borough Council have failed in their legal duty to co-operate with other local authorities, i.e. Wokingham Borough Council in this regard.</p> <p>Recommendation - Our client is therefore unable to support the draft Local Plan as currently drafted. However, we would like to invite the Inspector to consider the following addition to the wording of draft policy H12: “New student accommodation will be provided on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation, <u>...or in other sustainable locations with convenient access via walking, cycling, or public transport modes, to services, facilities and places of study.</u>” The addition of the suggested wording above is considered to allow sustainable development to take place, meet the demands of the student need for housing and not conflict with other policies within draft Local Plan. The above wording amendment also better reflects the assessment of the sustainability appraisal.</p>	
The Thackeray Estate	Policy H12: Student Accommodation	<p>We do not consider this policy to be sound. We consider that it is also appropriate to locate student accommodation in the town centre, given the accessibility of the centre and the range of facilities available and the need to help regenerate and improve the vitality and viability of the area. In particular we consider student accommodation would be an appropriate use as part of a mixed development of our clients’ site, 138-148 Friar Street, which is located in the heart of central Reading in Sub Area 1 of the Station/River Major Opportunity Area. Such a use would, in our opinion, be in accord with Policy CR6. Amend the first sentence of Policy H12 as follows: “New student accommodation will be provided on or adjacent to existing further or higher education campuses, or as an</p>	<p>No change proposed.</p> <p>Reading faces an issue of a number of sites, particularly in the town centre, which could be used to meet its very significant needs for general housing, being developed for student accommodation. This negatively affects the ability of the Council to meet housing needs. The needs for student accommodation, in comparison to general housing, are far from clear-cut. The issue is explored in more depth in</p>

		<p>extension or reconfiguration of existing student accommodation, <i>or on suitable sites within the town centre.</i></p>	<p>the Local Plan Background Paper. The proposed approach is felt to be a reasonable approach to try to ensure that housing sites are not lost to another use where need is not as clearly demonstrable and where there are options for providing student accommodation on other sites.</p> <p>However, irrespective of the above, policy H12 is not an absolute block on student accommodation, and is careful to include a clause that allows need for student accommodation over and above what can be provided on university and student accommodation sites to be demonstrated.</p> <p>The proposed amendment would completely change the nature and meaning of the policy, and would in fact give policy support to the current situation where potential housing sites are being developed for student accommodation.</p>
Unite Students	Policy H12	<p>Background - Our representation focuses primarily on the policies relating to the supply of housing and in particular student accommodation. Reading is a popular and well established university town. This is recognised by the SHMA which underpins the draft Local Plan identifies that students form an important part of the housing need. In this respect it is notable that the SHMA identified nearly 1000 households in Reading being formed wholly of students. Furthermore it anticipated a growth in student numbers from 13,135 in 2015 to 16,095 in 2018. It also anticipates that a third of this growth will be from international students who place greatest impact on the housing market. Within this context Unite believe that there is a major role to play for purpose built student accommodation in meeting the housing</p>	<p>No change proposed.</p> <p>Reading faces an issue of a number of sites, particularly in the town centre, which could be used to meet its very significant needs for general housing, being developed for student accommodation. This negatively affects the ability of the Council to meet housing needs. The needs for student accommodation, in comparison to general housing, are far from clear-cut. The issue is explored in more depth in the Local Plan Background Paper. The proposed</p>

	<p>need. This is supported by Paragraph 21 of the Government’s guidance document, ‘Housing and economic development needs assessments 2015’ which states local planning authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Student housing provided by private landlords is often a lower-cost form of housing. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Plan makers are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside of university-provided accommodation. Furthermore, there have been a number of examples where Inspectors have granted consent for student development on sites which have been allocated for residential development. These include 315-349 Mill Road, Cambridge (APP/Q0505/W/15/3035861) where the Inspector found that whilst there has been a rise in the provision of student accommodation, there is no clear indication that the shortage of student rooms reported in the Local Plan have been met and student accommodation is a form of housing which relieves the overall pressure for housing within the Borough. In addition, the Inspector noted that The Planning Practice Guidance enables student accommodation to be included towards the housing requirement, based on the amount of accommodation released to the housing market. Reference is made to data used by Cambridgeshire County Council, indicating a ratio of 3.5 student places to one house released. Another example includes a student mixed-use scheme at 52 Western Road, Leicester (APP/W2465/W/15/3141406) where the Inspector concluded that the provision of 279 student flats in a residential area would contribute to the Council’s housing land supply, meet an identified need and not cause adverse impacts upon neighbouring residents which would outweigh the benefits of the proposal. Similarly, purpose built student housing at Land at Fish Strand</p>	<p>approach is felt to be a reasonable approach to try to ensure that housing sites are not lost to another use where need is not as clearly demonstrable and where there are options for providing student accommodation on other sites.</p> <p>However, irrespective of the above, policy H12 is not an absolute block on student accommodation, and is careful to include a clause that allows need for student accommodation over and above what can be provided on university and student accommodation sites to be demonstrated.</p> <p>Appeal decisions elsewhere are dependent on the circumstances of the cases in question, including the policies that are in place, and the degree to which there is a quantified shortfall in accommodation, and may well be of limited relevance. The Council does currently seek to count student housing against its housing land supply, but there are limitations to the degree to which such accommodation will genuinely free up housing. In addition, this approach takes no account of the need for affordable housing, which could be delivered in a new housing development, but is not brought into the system by freeing up homes previously used for students.</p> <p>The proposed amendment would completely change the nature and meaning of the policy, and would in fact give policy support to the</p>
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		<p>Hill, Falmouth, Cornwall (APP/D0840/W/17/3177902) was allowed at appeal as the Inspector acknowledged the scheme would help to meet a significant need for PBSA which would free up existing housing currently occupied by students, for use by the residential population of Falmouth; secondly, the proposal would assist in the growth and success of the universities themselves; thirdly, it would contribute to meeting the Council's housing land supply and provide both short-term and long-term economic benefits for local people. Mindful of the above, Unite are concerned that the draft Local Plan is currently unsound in terms of its approach to the delivery of housing.</p> <p>H12: Student Accommodation - Draft Local Plan Policy H12 Student Accommodation details that new student accommodation will be provided on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation. The policy states there will be a presumption against proposals for new student accommodation on other sites unless it can be clearly demonstrated how the proposal meets a need that cannot be met on the above sites. The supporting text for Policy H12 acknowledges the many benefits of the growing student population in Reading and recognises the need for new student accommodation. However, it also states that this need should mainly be met on campus or through reconfiguration and redevelopment of existing halls of residence. It goes on to state that provision of new student accommodation needs to be balanced against other types of housing. Appendix 1 of the draft Local Plan recognises that student accommodation can free up existing housing and sets out the way the different types of accommodation are converted into dwelling equivalents in the Housing Trajectory. Student accommodation comprising bedroom clusters and shared kitchen and living facilities are considered to be equivalent to a single family dwelling as is a self-contained studio. Where accommodation is in the form of study bedrooms and some shared facilities, it is assumed that four bedrooms</p>	<p>current situation where potential housing sites are being developed for student accommodation.</p>
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		<p>equates to one dwelling. The future supply of family sized dwellings will also be delayed through the under supply of PBSA. This is due to family homes being converted to Houses of Multiple Occupation (HMO) to accommodate a small number of students rather than a family. This in turn increases housing demands in the area and also impacts on the affordability of family sized homes. The draft Local Plan states that the priority needs are currently for housing with two or more bedrooms that can house families. It should be recognised that many sites outside of the established student locations in Reading are highly sustainable, particularly in terms of access to goods and services and public transport connections. The ability of these sites to deliver student housing must be looked at on a site by site basis as it is possible that some sites will be more appropriate for PBSA than for family sized dwellings. The Local Plan recognises the many benefits the student population brings to the area; however, confining new PBSA to the established student locations will prevent these benefits from being spread out across the city. The concept of inclusive communities is set out in the vision of the draft Local Plan but it is unlikely that such communities can develop if students are essentially segregated from the rest of the population. This policy is highly restricted geographically for no sound planning reason and given the reasons explained above, should be amended as follows:</p> <ul style="list-style-type: none"> • The Policy should read, <i>“New student accommodation will be provided on or adjacent to existing further or higher education campuses, other sustainable locations, or as an extension or reconfiguration of existing student accommodation”</i>. • The next sentence, <i>“There will be a presumption against proposals for new student accommodation on other sites unless it can be clearly demonstrated how the proposal meets a need that cannot be met on the above sites”</i> should be deleted. 	
University of Reading	Policy H12	Policy H12: The University considers this Policy to be overly restrictive, not fully justified and therefore unsound. The Council refer to the SHMA (2016) that anticipated a growth in student numbers at the University from 13,135 in 2015, to 16,095 in 2016. The University is ambitious in its	No change proposed. Reading faces an issue of a number of sites, particularly in the town centre, which could be

	<p>future growth, seeking to compete with other leading institutions in the competition for talented students, who would benefit the University's development but also the wider economy. Data from the University suggests there is already an unmet demand with waiting lists over the last 4 years exceeding 700 students. Student numbers for the academic year September 2017 to August 2018 were 15,026, with numbers for the next three academic years predicted to annually rise by a magnitude in the region of 500 – 700 students per annum. University data demonstrates that 59% of the full-time student population is now aged 20 or below, with younger students more likely to seek official student accommodation. The University is keen to maintain its guarantee to first year students that student accommodation can be offered with associated support during that first year of study. Between 2010/22 to 2015/16 growth from students outside the region (within the UK) grew by 13%, whilst from the EU growth over the same period was 12% and outside the EU growth was 64%. Whilst the decision to leave the European Union may have an effect on students originating from within the EU, it would unlikely have significant effect on the greatest area of growth, from students outside the EU. Without sufficient dedicated student accommodation, this may hinder the University's growth, and in turn the contribution the University and its student population contributes to the local and regional economy. Further, students that do come to the University but cannot find student accommodation would more likely occupy less dense and efficient market housing or student Houses of Multiple Occupation ("HMO"), which could have otherwise contributed to standard market / affordable housing needs. The University of Reading is a popular student destination, and a major employer within the local Reading economy. In light of the above, there is clearly a current need for additional student accommodation, whilst future predicted trends for the University demonstrate a growing need. The University therefore holds concern on the current wording of draft Policy H12 which seeks to limit support new student accommodation to locations on or adjacent to existing further of higher education</p>	<p>used to meet its very significant needs for general housing, being developed for student accommodation. This negatively affects the ability of the Council to meet housing needs. The needs for student accommodation, in comparison to general housing, are far from clear-cut. The issue is explored in more depth in the Local Plan Background Paper. The proposed approach is felt to be a reasonable approach to try to ensure that housing sites are not lost to another use where need is not as clearly demonstrable and where there are options for providing student accommodation on other sites. There are constraints on existing university sites, but the areas concerned are extremely large, and development has taken place recently and is expected to continue to take place.</p> <p>However, irrespective of the above, policy H12 is not an absolute block on student accommodation, and is careful to include a clause that allows need for student accommodation over and above what can be provided on university and student accommodation sites to be demonstrated.</p> <p>The proposed amendment would completely change the nature and meaning of the policy, and would in fact give policy support to the current situation where potential housing sites are being developed for student accommodation.</p>
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		<p>campuses, or as extensions or reconfiguration of existing student accommodation. The University of Reading offers the majority of its student accommodation on its Whiteknights Campus, which is also the hub of University activity. The University therefore does not object to the focus of student accommodation being on or adjacent to existing sites or by extending and reconfiguring or extending existing accommodation, however, the anticipated growth and inability to offer all students accommodation (demonstrated by the aforementioned large waiting lists) demonstrates there is a current undersupply of student accommodation available to the University and therefore the policy should be amended to support the provision of student accommodation in all sustainable locations within the Borough. The Whiteknights Campus, as recognised by the Council at paragraph 9.3.9 of the Draft Plan, is constrained, located on the site of the 19th Century Whiteknights Park, and including a significant amount of parkland, woodland and lakes. Some of these existing elements have significant wildlife importance. Further, there are a number of listed buildings on site. The constraints to the University's Whiteknights Campus illustrate the problem with an overly restrictive policy which requires that student development would only be permitted on existing campuses. It is the University's strongly held position, that the NPPF support for development in sustainable locations should be carried across to student accommodation provision and that the policy should be reworded to allow student accommodation in other sustainable locations within the Borough. This would be consistent with the Council's proposed allocation of Reading Prison (CR13a) which the Council have identified could be used for "residential or student accommodation" despite not being a current campus location. The proposed wording is provided below: "New student accommodation will be provided on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation, <u>or in other sustainable locations with convenient access via walking, cycling or public transport modes, to services,</u></p>	
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		<p>facilities and places of study. There will be a presumption against proposals for new student accommodation on other sites unless it can be clearly demonstrated how the proposal meets a need that cannot be met on the above sites.” The University would further advise, in order to remain consistent with our advised changes above, that paragraphs 4.4.96 and 4.4.98 are both amended to refer to the need to meet student accommodation need on campus, established student locations or through reconfiguration and redevelopment of existing halls of residence “or other sustainable locations with convenient access via walking, cycling or public transport modes, to services, facilities and places of study”.</p>	
Bracknell Forest Council	Policy H13	<p>Gypsies and travellers – Policy H13 sets out criteria for new traveller sites, and the supporting text sets out the results of the Gypsy and Traveller Accommodation Assessment (GTAA). It is understood that following no sites being put forward, the Council has undertaken a review of its own land to try and accommodate the need for between 10-17 permanent pitches, but none are considered suitable (para 4.4.100). It is noted that Reading Borough Council is currently looking to its neighbours to meet the shortfall, through Duty to Cooperate discussions. Bracknell Forest Council believes that in order to meet local need, the unmet need should be addressed as close to Reading as is possible.</p>	<p>Noted. No change needed. The Council has now made a formal duty to co-operate request to neighbouring authorities to consider meeting the need. It is agreed that, in principle, needs should be met as close to where they arise as possible, subject to other considerations.</p>
Historic England	Policy H13	<p>Policy H13 - Historic England welcomes and supports criterion v) of Policy H13 Provision for Gypsies and Travellers as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.</p>	<p>Noted. No change needed.</p>
Pang Valley Group of the Ramblers’ Association	Policy H13	<p>H12: Within Policy WR4, reference is made to Policy H13. That is incorrect and reference should have been to Policy H12. Subsection (ii) of the Policy requires that proposals should “have safe and convenient access onto the highway network.” I support that contention because that should mean both to users of the site and to other users be they vehicular or pedestrian. The site that the Council has selected is outlined</p>	<p>No change proposed. This representation appears to be working from the Draft Local Plan (May 2017) rather than the Pre-Submission Draft Local Plan (November 2017). The reference to H13 (which was H12 in the Draft) is correct, and the supporting text had already been updated.</p>

		<p>in Policy WR4 and I have registered an objection to that Policy because it is proposed that access is provided by that part of Cow Lane that is Public Footpath Reading 17. Justification Paragraph 4.4.86 should be amended to exclude the wording highlighted because the Council has now concluded its Gypsy and Traveller Accommodation Assessment. Similarly the wording highlighted in justification paragraph 4.4.88 should be removed because it has been overtaken by the publication of this Pre-Submission Draft. I submit that the wording of Paragraphs 4.4.86 and 4.4.87 should be amended to reflect that events have now rendered that wording obsolete. Please read this representation in conjunction with our representation made regarding the G&T Provision Consultation Document, Sept. 2017.</p>	
<p>South Oxfordshire District Council</p>	<p>Policy H13</p>	<p>Policy H13: Provision for Gypsies and Travellers – The Reading Borough Gypsy and Traveller, Travelling Showperson and Houseboat Dweller Accommodation Assessment (2017) identifies a need for 10-17 permanent gypsy and traveller pitches and 5 transit pitches up to 2037. It also identified two additional plots of travelling showpeople up to 2037. Following a site assessment process, it was found that there are no sites to meet the permanent accommodation needs. We consider that a site or sites should be identified to address these needs and that the site(s) should be provided in the area where the need arises. We agree with national policy that requires the local authority where the need arises to meet that need, unless there are exceptional reasons why it should not. To this end, we would seek assurances that all options have been explored in terms of identifying appropriate sites or including gypsy and traveller provision within residential or mixed use allocations proposed in the Pre-Submission Draft reading Local Plan and/or the development opportunity identified at Grazeley in the West of Berkshire Spatial Planning Framework (2016) and Pre-Submission Draft Reading Local Plan. If a site cannot be found, we note your intent to resolve the issue with neighbouring authorities through the duty to co-operate. We are happy to establish an open dialogue regarding the results of your Gypsy and Traveller Accommodation Assessment. Policy H13 lists a set</p>	<p>Noted. No change proposed.</p> <p>RBC is continuing these discussions under the duty to co-operate, and more information on the discussions around this is set out in the Duty to Co-operate Statement. The Council can confirm that there are no options for accommodating this need within residential or mixed use sites within the Borough.</p> <p>In terms of access to a range of facilities, the Council is merely attempting to reflect criteria b) and c) of paragraph 13 of Planning Policy for Traveller Sites. In practice, most of the Borough will be accessible to facilities by a choice of means of travel.</p>

		of criteria against which proposals for new sites, or extensions to existing sites will be judged. This includes having 'good access to a range of facilities including education and healthcare by choice of means of travel, including walking.' We would not that policies for determining gypsy and traveller sites should not be more restrictive than those for bricks and mortar accommodation, making it harder to gain planning permission for sites. We would question why sites for gypsy and traveller would be required to have access by food to healthcare and education. This restricts the opportunity for meeting the identified within Reading.	
Wokingham Borough Council	Policy H13	Gypsy and Traveller Provision – H13 is a criteria-based policy which sets out a series of requirements against which applications for new pitches will be assessed. The Government document Planning Policy for Traveller Sites (PPTS) sets out that local plans should include criteria-based policies to provide the basis for decisions in the event that applications for pitches come forward. WBC consider that policy H13 complies with this requirement and is sound. However, the PPTS also makes clear that local planning authorities should identify a supply of deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets, and also identify developable sites or broad locations of growth for years 6-10 and, where possible, 11-15 years. RBC set out in a separate Gypsy and Traveller provision consultation in September/October 2017 that it would be unable to meet any of its identified need within its administrative area. WBC commented on this consultation that Reading Borough Council should seek to meet its own need in full. WBC's consultation response also encouraged RBC to undertake additional work to identify whether any of its own land assets, some of which were identified as being unavailable at the time of the consultation but potentially suitable for Gypsy and Traveller use, could be further investigated. WBC also commented that it was open to RBC to consider the purchase of additional land to be allocated to meet its identified need. The current plan does not address WBC's previous objections. In addition no further explanation of justification has been	Noted. No change proposed. RBC is continuing these discussions under the duty to co-operate, and more information on the discussions around this is set out in the Duty to Co-operate Statement. The Council can confirm that the sites listed as being required for alternative uses in the Background Document are not available, and has now replied to WBC with details of those uses. With resources as they are, there is no prospect of the Council being in a position to purchase additional land to meet needs for gypsies and travellers, as any potentially suitable sites would also be potentially suitable housing sites, and valued as such. Such sites would very likely already be in the Local Plan as a development allocation for housing or employment, and identification of sites for gypsy and traveller use would simply mean a failure or further failure to meet housing or employment needs, which must also then be dealt with under the duty to co-operate.

		received. There has been no agreement with the other local authorities as to how this unmet need might be accommodated. In the absence of any agreed strategy for meeting this need, it is recommended that this aspect of the Plan is unsound as it has not been positively prepared with regard to identified needs or adequate justification as to why this cannot be achieved.	
Natural England	Policy H14	<p>Policy: H13</p> <p>Legislation/Plan reference: Paragraph 109 of the NPPF states that ‘the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible’</p> <p>Issue Type: Compliance with NPPF</p> <p>Issue: Ambiguity around compensation for the loss of open space through development and how this relates to the principle of biodiversity net gain.</p> <p>Solution: Where this policy states that ‘any loss of undeveloped land would be outweighed by a qualitative improvement in open and green space’, it should be clarified that a biodiversity net gain would be required for development, as per the measure outlined in policy EN12.</p>	It is assumed that this comment relates to policy H14 rather than H13. Partially agreed. Change proposed. There is no need for this policy to repeat policy from elsewhere, as these criteria would otherwise need to be substantially expanded, but a reference to the need to comply with other policies should be included.
Greater London Authority	Section 4.5	From a transport perspective, we refer to the capacity improvements and related opportunities arising from the Great Western Mainline, Western Access to Heathrow and Crossrail set out in our response to your Issues and Options draft. We welcome the reference to the Crossrail Safeguarding Direction in 4.5.10. It will be important to liaise closely with Transport for London on taking proposals for individual sites forward. For further details, please see TfL’s response.	Noted. No change needed.
Rowe, Dr Simon	Section 4.5	Transport: Where access is being improved could sufficient provision be given to pedestrians AND cyclists? Paths wide enough for both? So many paths are too narrow.	No change proposed. This may be achievable in some cases, but within the existing built form of Reading it cannot always be achieved. The Cycling Strategy approach is a network of routes for cyclists, and this has fed into policy TR4.
Rowe, Dr Simon	Section 4.5	Transport: Air Quality - Reading has some of the worst traffic light synchronisation I have ever experienced. Time after time, one green	No change proposed. Traffic light synchronisation is not a matter for the Local

		light leads to a red, leading to an endless stop/idle/start cycles which must decrease the air quality enormously, especially outside the rush hours. Could it be considered that at certain times (maybe 11 p.m. to 5 a.m.) many traffic lights are switched off? Can anything be done like this outside rush hours? Also, Vastern Road is subject to many unnecessary delays with the fixed synchronisation.	Plan.
Rowe, Dr Simon	Section 4.5	Transport: Has a feasibility study been done on a new station to the south of Calcot and/or Southcote?	No change proposed. There has been no work undertaken to examine the feasibility of a station in this location.
Highways England	Policy TR1	TR1: Achieving the Transport Strategy – TR1 has not been materially altered and therefore we continue to be supportive of this policy as it will minimise potential impacts in line with NPPF and Circular 02/2013.	Noted. No change needed.
Mapletree Investments Pte	Policy TR1	TR1: Achieving the Transport Strategy – GPR are pleased to see an alteration in the policy supporting text (paragraph 4.5.4) relating to transport impact in that the Council will look to take into account levels of development already been accepted, and will acknowledge mitigation measures that have already been agreed or implemented.	Noted. No change needed.
Reading Friends of the Earth	Policy TR1	<p>Soundness - Not sound because the current Transport Strategy does not include demand management measures so is unlikely to achieve Reading LTP's Objectives as set out in 4.5.1 of this document, in particular:</p> <ul style="list-style-type: none"> • 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. <p>In view of the forecast growth of Reading (referenced in 4.5.2) measures such as Road Pricing, Clean Air Zones, and Workplace Parking Levies should be included in the Transport Plan.</p> <p>While measures to support modal shift away from the private car are to be supported the current proposals are unlikely to lead to a substantial fall in congestion. For example recent analysis (Demand Modelling Report – see Ref.) for the East Reading Mass Rapid Transit concludes:</p>	No change proposed. This is an objection to the content of the Local Transport Plan. The LTP will be reviewed in due course, and this will involve consideration of a whole range of measures, not merely those with a physical, spatial element that are covered in the Local Plan.

		<p>“5.3 the scheme would shift some car trips to public transport, the reduction in car trips on the network would not be so large as to release substantial road capacity in the corridor.” Modification to 4.5.2: Replace “The predicted growth in trips can only be accommodated through major investment in transport, particularly sustainable modes.” With “The predicted growth in trips can only be accommodated through major investment in transport, particularly sustainable modes, and substantial modal shift achieved through demand management measures such as Road Pricing, Clean Air Zones, and Workplace Parking Levies.”</p>	
BBOWT	Policy TR2	<p>BBOWT holds no in-principle objection to a transport policy that identifies major strategic transport projects. However, this policy includes a reference to safeguarded land for the eastern Mass Rapid Transit route (TR2a), which is land also identified elsewhere within this Submission Local Plan as a local green space (EN7Cd), major landscape feature (EN13), is in part a designated Local Wildlife Site (policy EN12), is considered to contain priority habitat and acts as a green corridor (protected under policy EN12 and Reading Biodiversity Action Plan), and will have significant unmitigated impacts on the Thames River corridor (protected under policy EN11). The full detail of BBOWT’s objection to this site is contained with our (so far) two detailed representations to the Council on submitted planning application 171108, so we do not replicate those points here. However, we wish to register an objection to the safeguarding of this area of land for the purpose of an eastern Mass Rapid Transit route within our response here. In relation to the proposed crossing of the River Thames (policy TR2), BBOWT holds no in-principle objection, but considers that any proposal for such a scheme should be of an exemplary standard in terms of biodiversity impact avoidance, mitigation and, as needed, compensation, aiming to bring about a significant uplift in biodiversity as a result of the proposal as a result of the proposal (e.g. 20% or greater, as defined in Lichfield’s adopted SPD) as well as exemplar standards of species-specific mitigation that may be required.</p>	<p>No change proposed.</p> <p>In terms of East MRT, the Local Plan does not safeguard particular land for the East MRT route. There is an existing planning application, which will be considered on its merits, and no comment is offered here on the specific land identified in that application, but it is important not to conflate the two. There is considered to be sufficient land along the northern side of the railway that delivery of a link need not necessarily result in any significant loss of Local Green Space or Local Wildlife Site. The Major Landscape Feature designation is not a block on all development but ensures that development does not detract from the overall landscape value.</p> <p>In terms of the Thames Crossing, the link would be located within Wokingham and South Oxfordshire, and it is for those authorities to set development management policy around design and standards.</p>

Bracknell Forest Council	Policy TR2	Bracknell Forest Council is supportive of Policy TR2 with regards to its identification of the National Cycle Network Route 422, which will link Newbury to Windsor, including parts of Bracknell Forest.	Noted. No change needed.
Englefield Estate	Policy TR2	We welcome recognition of the potential impacts that development at Grazeley could have on infrastructure. Support is therefore expressed for the major transport projects identified in TR2 and at Figure 4.8, in particular the south Reading Mass Rapid Transit (MRT) and Mere oak Park and Ride site which would support sustainable development at Grazeley.	Noted. No change needed.
Mapletree Investments Pte	Policy TR2	TR2: Major Transport Projects – GPR maintains, as far as possible, that the MRT should not use the existing road network which will exacerbate the traffic situation.	No change proposed. There will need to be a mix of use of existing roads and new dedicated space.
Oxfordshire County Council	Policy TR2	<p>New River Thames crossing</p> <ol style="list-style-type: none"> The draft Local Plan is not positively prepared in that it does not provide for measures within South Oxfordshire to mitigate the impact of the proposed new River Thames crossing. The costs of the proposed new river crossing scheme quoted in the IDP are a significant underestimate. The costs of the scheme do not include mitigation measures within South Oxfordshire. <p>The following modifications should be made:</p> <ol style="list-style-type: none"> Para 4.5.9 and/or para 8.2.5 should include a requirement for relevant mitigation measures within South Oxfordshire The River Crossing section of the IDP needs to be updated to reflect recent work undertaken for the financial case for the scheme options which range from £109m for option 1 to £165m for option 3 A reference to relevant mitigation measures within South Oxfordshire being additional must be included in the River Crossing section of the IDP and when available, the level and cost of measures should be built into the costs and delivery of the bridge 	<p>Partly agreed. No change proposed.</p> <p>Further work has now been undertaken on the costs of the project, and this should be reflected in the Infrastructure Delivery Plan.</p> <p>In terms of mitigation measures of its impact, the implications on the transport network will need to be considered as a whole as part of the normal process of developing a transport scheme. This will be done through the joint working arrangements. It is not considered necessary to specifically highlight mitigation of transport impacts within South Oxfordshire. A policy that would be used in development management may need to deal with mitigation measures, but this will primarily need to be dealt with in Wokingham and South Oxfordshire Local Plans.</p>
Oxfordshire County Council	Policy TR2	<p>Park and Ride Sites and Mass Transit</p> <ol style="list-style-type: none"> The approach to Park and Ride sites and Rapid Transit which suggests 	No change proposed. A key element of Reading's transport strategy is to provide a

		<p>Park and Ride sites potentially within South Oxfordshire is not justified or effective.</p> <p>b. The cost figure for all of the Park and Ride proposals quoted in the IDP is not broken down by scheme and appears to be an underestimate.</p> <p>The following modifications should be made:</p> <p>a. The last two sentences of para 4.5.8 bullet 2 should be deleted.</p> <p>b. A reference should be included in the Plan to an alternative strategy of pump-priming interurban bus services to ‘Premium Route’ standards.</p> <p>c. However, if references to potential Park and Ride sites within South Oxfordshire remain in the Plan, the IDP should be amended to reflect the full costs of providing sites within South Oxfordshire and how they are to be funded.</p>	<p>comprehensive network of P&R sites for trips into Reading town centre, including to the north of the Borough. This is a comparable approach to that undertaken for Oxford city centre. The objective for P&R sites to the north is to remove existing car trips from the heavily congested highway network, including the limited river crossings, rather than to generate additional trips. The agreed approach of working in partnership to seek investment to enhance inter-urban bus services to ‘Premium Routes’ will further decrease the likelihood of the P&R sites generating significant levels of additional traffic in South Oxfordshire, as residents would be more likely to use the bus from their nearest stop. The Council has historically undertaken work to assess possible locations for P&R sites to the north of Reading; the intention would be to update this work in partnership with both Oxfordshire and South Oxfordshire to ensure that suitable sites are identified, and mitigation measures if required, prior to any significant scheme development work being undertaken.</p>
<p>Reading Friends of the Earth</p>	<p>Policy TR2</p>	<p>Soundness - Not sound because alternatives to the East Reading Mass Rapid Transit should be safeguarded because the ‘preferred route’ is extremely controversial and has been objected to by the Environment Agency and many others. Safeguarding of land for East Reading MRT as depicted in Figure 4.8 is not sound as it contravenes Reading LTP’s Objectives as set out in 4.5.1 of this document:</p> <p>“To deliver balanced packages of value for money transport solutions and make best use of existing transport investment.”</p> <ul style="list-style-type: none"> • Readings sophisticated traffic management system could be utilised to actively manage traffic via selective road user 	<p>No change proposed. In terms of East MRT, the Local Plan does not safeguard particular land for the East MRT route. There is an existing planning application, which will be considered on its merits, and no comment is offered here on the specific land identified in that application, but it is important not to conflate the two. The fact that a scheme is controversial is not in itself a reason not to proceed with it. It is not agreed that provision of a link would necessarily have a</p>

		<p>charging at minimal cost and for widespread benefit compared to East Reading MRT which carries high cost and negligible benefit.</p> <p>“To align transport and land use planning to enable sustainable travel choices, improve mobility, reduce the need to travel and preserve the natural environment”</p> <ul style="list-style-type: none"> • East Reading MRT would create gratuitous destruction of the natural environment for negligible benefit to the local population. <p>Modification to TR2: Land should also be safeguarded to improve capacity on the A4 between Cemetery Junction and Suttons Seeds. Modification to 4.5.8: Replace first bullet with ““Mass Rapid Transit: This is a scheme to provide high quality public transport connections between park and ride sites and major travel generators. To the maximum extent possible this will make use of existing transport infrastructure to avoid loss of natural environment. The project involves a number of corridors across the Borough (see figure 4.8), but the route to the south is at an advanced stage, and can be safeguarded on the Proposals Map. Much of the land shown on the route to the South has been secured by Section 106 agreement on major development schemes, and this will continue to be sought on key sites where they come forward.” Modification to figure 4.8: The map in Figure 4.8 must be modified to remove East Reading MRT.</p>	<p>destructive approach on the local environment, as this will depend entirely on the alignment and design.</p> <p>It is not clear how land could be safeguarded to increase capacity on the A4 between Cemetery Junction and Suttons Seeds without loss of some of the Local Green Space at Palmer Park and part of a registered park at Reading Cemetery. This would be no less controversial.</p>
Reading Urban Wildlife Group	Policy TR2	<p><u>Policy TR2</u></p> <p>Soundness: the ‘preferred route’ for the East Reading Mass Rapid Transit is controversial; alternative routes should be safeguarded in the local plan</p>	<p>No change proposed. In terms of East MRT, the Local Plan does not safeguard particular land for the East MRT route. There is an existing planning application, which will be considered on its merits, and no comment is offered here on the specific land identified in that application, but it is important not to conflate the two. The fact that a scheme is controversial is not in itself a reason not to proceed with it.</p>
Royal Borough	Policy TR2	TR2 - RBWM welcomes Reading Borough Council’s commitment to	Noted. No change needed.

of Windsor and Maidenhead		continuing to work with neighbouring authorities and the TVBLEP.	
South Oxfordshire District Council	Policy TR2	Policy TR2: Major Transport Projects – We note that Policy TR2 gives priority to the implementation of major transport projects including park and ride sites and a potential additional crossing of the River Thames. Paragraph 4.5.8 and Figure 4.8 identify those projects likely to have the most significant needs in terms of land use. This includes three park and ride sites in the north of the Borough and a potential additional Thames crossing. These schemes are also identified in paragraph 8.2.1 that sets out the key principles relating to the strategy for Caversham and Emmer Green. We note that no specific sites have been identified for new park & ride sites as outlined in policy TR2, but that these are likely to be within neighbouring authorities, including South Oxfordshire, where there are three corridors that cross the border into South Oxfordshire, as showing in Figure 4.8. South Oxfordshire District Council is keen to work with you to understand further and in more detail the specific locations and justification for these major transport projects.	Noted. No change needed. RBC will continue to work with SODC in seeking to identify and assess sites for park and ride provision.
Wokingham Borough Council	Policy TR2	Transport Infrastructure – WBC welcomes the commitment to all of the schemes set out in policy TR2. The identified schemes which would directly affect Wokingham Borough, and which are shown on Figure 4.8 are: Mass Rapid Transit, Park and Ride, Crossing of the River Thames, and National Cycle Network Route 422. Wokingham Borough Council supports these schemes. At the last plan stage the MRT route was only shown along the A3290 towards Winnersh and Wokingham. Following our comments, the Plan now shows an additional MRT route using the A4 towards Woodley. This is welcomed however we would wish for the Plan to recognise the potential extension of this route further eastwards and WBC would continue to welcome additional engagement on this matter. The development of a Park and Ride corridor at Thames Valley Park within Wokingham Borough is supported. This will require on-going co-operation between the two authorities. WBC also welcomes reference within TR2 to Crossing of the River Thames and the potential crossing route for this is shown in figure 4.8. WBC is leading the in on-	Noted. No change needed. Discussions around these issues will continue under the duty to co-operate and existing joint working arrangements.

		going dialogue with RBC, Oxfordshire County Council, South Oxford District Council and the Thames Valley Berkshire Local Enterprise Partnership regarding cross-border transport capacity improvements such as the bridge. Additional highways capacity to the east of Reading will alleviate traffic congestion and have economic benefits for the wider region. WBC anticipates continuing to work with RBC and wider authorities on this and other relevant strategic infrastructure planning matters in the future. WBC notes that a route would likely not include land within Reading Borough, but is likely to involve land in S. Oxfordshire and Wokingham Borough (as is outlined in the Strategic Outline Business Case found on the Wokingham Borough Council website). Therefore no land within Reading Borough has been safeguarded on the policies map for this purpose. The lack of any safeguarded land is not considered to render the policy unsound, but additional close working with RBC will be needed moving forward.	
Environment Agency	Paragraph 4.5.8	With regard to the bullet point about the potential new crossing of the River Thames, please add that should this be agreed, it must be designed in such a way as to ensure that the river, river corridor and adjacent lakes are not impacted negatively.	No change proposed. The link would be located within Wokingham and South Oxfordshire, and it is for those authorities to set development management policy around design.
Highways England	Policy TR3	TR3: Access, Traffic and Highway-Related Matters - TR1 has not been materially altered and therefore we continue to be supportive of this policy as it will minimise potential impacts in line with NPPF and Circular 02/2013.	Noted. No change needed.
Mapletree Investments Pte	Policy TR3	TR3: Access Traffic and Highways Related Matter – Policy TR3 remains unchanged from the previous Regulation 18 consultation, listing criteria i) to v) that need to be addressed. The policy and supporting text seems to reflect current transport planning rationale, and GPR assumes the wording has been drafted to give some flexibility to enable a ‘monitor and manage’ approach. In overall terms, GPR maintains the view that draft policy is, therefore, logical in stating that where there are currently safe and free-flowing transport links, then such conditions should not be compromised by intensifying traffic levels from accesses on to the corridor, and/or facilitating localised car trips that could otherwise be	Noted. No change needed. In terms of the clause in 4.5.14, relevant policies such as TR1 and CC9 already deal with transport mitigation measures, and it is not considered that anything should be added to TR3.

		made by other alternative modes. GPR, therefore, supports this approach. Paragraph 4.5.14 outlines that where congestion occurs and additional trips are likely to worsen conditions, then the policy suggests transport mitigation should come forward, but not just highway mitigation, which GPR would encourage. GPR also agrees this should be added to the list in TR3 to offer a way forward for potential development to mitigate additional trips on the transport network.	
Pang Valley Group of the Ramblers' Association	Policy TR4	<p>TR4 and Proposals Map - In May 2017 Reading Borough Council has launched a Public Consultation by Notice Dated 27 April 2017 on their proposal to convert half the width of public footpaths covering the length of the Thames Path from the Roebuck Hotel through to Kennet Mouth. I, together with many others, objected to that proposal and attach a copy of that submission. Reading Borough Council was thus obliged to submit their proposal to the Secretary of State for approval. I attach a copy of that submission dated 23 May 2017 as Appendix 1 together with Appendices A, B and C that were attached to that submission. The Thames Path is shown on the proposals map as a cycle track (admitted by the Council to be a designation that it does not control) and is covered by Policy TR4. I maintain that designation is premature and incorrect. In particular I take issue with the highlighted words of justification paragraph 4.5.19: "The relevant routes are shown on the Proposals Map, and the Policy therefore applies to these routes" and in the first sub-paragraph of Justification Paragraph 4.5.18 "and River Thames". The first sub-paragraph 4.5.18 should be amended by deleting the word "and River Thames." Justification paragraph 4.5.19 should be amended by deleting the wording "The relevant routes are shown on the Proposals Map, and the policy therefore applies to those routes" and the designation of the Thames Path as a cycle track should be removed from the proposals map.</p> <p>My reasoning is that The Secretary of State has yet to give his decision on the application by Reading Borough Council on their proposal to alter the status of the Thames Path. The Council could be seen to be pre-empting that decision and possibly attempting to circumvent the</p>	<p>No change proposed.</p> <p>The purpose of this aspect of the policy is to give support to the identification of those routes that have already been identified within the network of routes on the Council's website, as part of the Cycling Strategy. The supporting text to the policy already notes that this may change over time, and if there are changes in circumstances, the routes will need to be amended to reflect this.</p> <p>Paragraph 4.5.18 is simply a quote from the Cycling Strategy.</p> <p>The reference to the Proposals Map in 4.5.19 is appropriate and necessary to understand how the policy works.</p>

		<p>procedure of having to seek the Secretary of State’s ruling. Government Advice is that development should be in accordance with the Adopted Local Plan unless there are extenuating circumstances so it is important that the Borough Plan is clear and unambiguous. The designation of the Thames Path is premature. All of the objections raised in May 2017 have to be considered by the Secretary of State, possibly following a public inquiry, before any change in designation from a footpath to a footpath and Cycle Track. The reasoning for my objection is fully set out in the submission and Appendices that I made in May 2017 and which are attached to this submission. The wording of Justification Paragraphs 4.5.18 and 4.5.19 should be amended as suggested above and the designation of the Thames Path as a cycle track should be removed from the Proposals Map. (Photos attached in representation.)</p>	
Rowe, Dr Simon	Policy TR4	<p>Transport: Can I urge that much, much better consideration be given to cyclists needs on the road network? The recent Vastern road re-development shows that cyclists concerns are given minor considerations at the end of the process – the station roundabout is a cyclist death trap, especially going from the railway bridge to Reading Bridge. I have risen this already with no result. Cycle access to the station from Caversham is much improved with the new bridge, but where the cyclists go beyond the station is still fraught with narrow congested roads and poorly thought out layouts for junctions. Cyclists are not allowed to cycle through the station underpass – this is sensible, but widely ignored and there should be a safe cyclist route under the railway.</p>	<p>No change proposed. Policy TR4 sets out proposals to improve facilities for cyclists, including development of a network of safe routes.</p>
Reading Friends of the Earth	Policy TR5	<p>Policy TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING Soundness: This does not go far enough to encourage and facilitate electric vehicle use. New communal parking space provision should be future-proofed by provision of sufficient charging capacity to cope with much higher uptake than 10%. Provision should be made for residents with on-street parking. Modification: Change second bullet point to: “Within communal car parks for residential or non-residential developments of at least 10</p>	<p>No change proposed. The plan must strike a balance between securing infrastructure for vehicle charging, and overly burdening development proposals in line with the NPPF. The 10% provision is in line with the highest proportion sought outside London that the Council could identify (Brighton and Hove). In terms of on-street parking, the Council generally</p>

		spaces, 25% of spaces should provide an active charging point and cabling should have capacity to supply charge to 100% of vehicles.” Add new third bullet point: “Where on-street parking is to be permitted in residential areas residents should have defined spaces and cabling and layout should provide for easy installation of electric vehicle charging points.”	expects parking provision for new developments on site rather than relying on on-street parking. Provision of facilities at the kerbside is therefore less related to new development and more related to provision of infrastructure through other means.
Reading Urban Wildlife Group	Policy TR5	<u>Policy TR5</u> Soundness: The government has announced elimination of diesel and petrol vehicles well within the lifespan of these new developments; we can expect a faster take-up of electric vehicles in the near future. A large proportion of proposed development in Reading is high density apartments where there is no dedicated parking. Owners of these units should not be prevented from choosing electric vehicles either as individual or car share ownership. Charging points for electric vehicles need to be far more numerous or, at a minimum, the electrical supply system laid during construction phase so that additional charging points can be installed easily and cheaply in the future without disturbance of paving/planting etc. Suggested Modification: increase provision to a minimum 20% of spaces with charging points and add to second paragraph: “and electrical supply cables laid to enable additional charging points to be installed easily in the future.”	No change proposed. The plan must strike a balance between securing infrastructure for vehicle charging, and overly burdening development proposals in line with the NPPF. The 10% provision is in line with the highest proportion sought outside London that the Council could identify (Brighton and Hove). In terms of high-density developments with no parking, the expectation is that there is no car at all and that there is a reliance on public transport.
Mapletree Investments Pte	Section 4.6	Retail, Leisure and Culture Chapter – “Centre” and “Non-Centre Uses” – GPR maintains the need to differentiate between in centre and non-centre uses, reflective of the NPPF definitions, in relation to protect uses in district and local centres. GPR maintains that it would be better if paragraph 4.6.16 could recognise that some in centre uses may be appropriate as ancillary of ‘community’ uses to support business and employment development, subject to the sequential test. This would reflect the text change to Policy EM2 supporting text.	No change proposed. The principle that some uses may be appropriate elsewhere on an ancillary basis is accepted. However, this paragraph is not the place to deal with the issue as it is referring to how applications within centres will be treated. Changes to the Employment chapter were made at Pre-Submission stage to address the issue.
Gladman Developments	Policy RL1	Policy RL1 – sound (consistent with national policy). This policy defines Emmer Green as a District Centre, but paragraph 8.2.2 concludes that Caversham and Emmer Green have relatively little scope for additional development. This conclusion seemingly disregards development	No change proposed. The purpose of the strategy for the Caversham and Emmer Green part of Reading is not to comment on the scope for development in adjoining areas.

		opportunities that exist beyond the administrative boundary of Reading.	
Hermes Property Unit Trust	Policy RL1	<p>Policy RL1 – Hermes supports inclusion of the following:</p> <ul style="list-style-type: none"> • Accessibility and transport improvements; • Broadening range of facilities; • Residential use of upper floors; and • Environmental enhancements. <p>We consider that reference should be made to Caversham District Centre within the policy as an area of intensification and change alongside the Meadway and Whitley District Centre which are already cited, given the significant regeneration opportunities which are approved and already coming forward which will see the District Centre evolve over the plan period.</p>	Partially agreed. Change proposed. The changes proposed for Caversham are not on the same scale as those in the Meadway or Whitley, but it is considered that this can be recognised in the supporting text.
K2 Developments	Policy RL1	<p>RL1: Network and Hierarchy of Centres – We support this policy and the identification of Reading as a regional centre alongside the reference to broadening the range of facilities in such location. We further agree that the Centre of Reading should be the focus of the greatest level of change albeit consider a distinction should be made between Central Reading and Reading Town Centre.</p>	Noted. No change needed.
Bracknell Forest Council	Policy RL2	<p>Retail – It is noted that the retail floorspace quoted in Policy RL2 has been amended from 44,600 sq m to 34,900 sq m as set out in the Western Berkshire Retail and Commercial Leisure Assessment 2016, and that this figure combines comparative and convenience floorspace since changes between these uses can occur under permitted development rights. Though the Assessment sets out that this is net, it is still unclear from Policy RL2 whether this is net or gross floorspace.</p>	Agreed. Change proposed. The supporting text should clarify that figures are net.
Hermes Property Unit Trust	Policy RL2	<p>Policy RL2 – Whilst the policy focusses on the Centre of Reading, we consider that this form of development should also be referenced within the policies and aspirations of District Centres where such uses would broaden the offering of uses/services and reinforce the identity of such Centres which is a key objective of the Local Plan as discussed above. This could be worded to acknowledge that the provision within a District Centre should be proportionate to the size of the Centre. This position</p>	Partially agreed. Change proposed. Central Reading will continue to be the main focus for the scale of retail, leisure and culture need identified. It is considered that the policies as worded generally support the provision of these uses within other centres, but that an amendment to RL2 should reflect national policy

		would further support paragraph 4.6.13 with regard to reducing the need to travel to the centre of Reading for such facilities, thereby enhancing the vitality of those centres. In addition, it is unlikely that all of the leisure requirements identified within the Retail and Commercial Leisure Study (2017) will be accommodated within the area defined as Central Reading and as such the District Centres, as appropriate locations for accommodating, can help meet those identified needs whilst also contributing to the vitality and viability of the Centres themselves. Policy RL2 should reflect the opportunities that District Centres can offer with regard to additional leisure provision to ensure that needs can be met over the plan period.	in that other centres will need to be considered before considering sites in other locations.
K2 Developments	Policy RL2	RL2: Scale and Location of Retail, Leisure and Culture Development – We support this policy. However, we would also note that the centre provides significant opportunities for visitor accommodation, tourism and leisure and would urge that this is incorporated into the supporting text.	No change proposed. The fact that the centre of Reading is the most appropriate location and has the greatest capacity for this kind of development is already dealt with in the supporting text to RL2.
Slough Borough Council	Policy RL2	Retail and Leisure Needs - Policy RL2 sets out below that there will be additional 34,900 sq. m of retail and related facilities. The identified retail and leisure need is directed to the centre of Reading, f the retail floorspace is mainly planned for in the site allocations and major opportunity areas (CR11, CR12 and CR13) in centre of Reading. Slough Borough Council does not object to the additional retail floorspace being developed as majority of this is committed development that helps support the regeneration of Reading town centre, around the train station, edge of town and district centres.	Noted. No change needed.
Wokingham Borough Council	Policy RL2	Provision of Retail – Within policy RL2, Reading Borough Council intends to consider both the comparison goods and convenience goods floorspace need as a whole and to provide for an overall retail need for up to 34,900 sq m of retail and related facilities up until 2036. RBC has decided to take this approach because no planning permission is generally required to change the use of a building between convenience and comparison goods with the sale of both types of goods being within the Class A1 use class for retail. Reading Borough Council are therefore	Noted. No change needed. Discussions around this issue will continue under the duty to co-operate.

		<p>accommodating their overall retail need. The Western Berkshire Retail and Commercial Leisure Assessment demonstrated that there is a need for 12,900 sq m of convenience floorspace in the Winnersh/Woodley/Lower Earley area of Wokingham Borough. This area adjoins the Reading Borough boundary, and the evidence demonstrates that residents living in the East Reading area do shop in convenience good stores that lie within the Wokingham Borough boundary. It is therefore recommended that WBC and RBC collaborate on this matter to ensure that the identified convenience goods is suitably met.</p>	
<p>Hermes Property Unit Trust</p>	<p>Policy RL3</p>	<p>Policy RL3 – We strongly object to the increase from 50% to 60% of total length of Key Frontages within the Centre as A1 or A2 (point a). Point (b) states that “there will be no net loss of ‘centre uses’ for ‘non-centre uses’ at the ground floors (apart from entrances to upper floors) except in exceptional circumstances.’ Given the intention to further increase A1 and A2 uses, we do not consider that uses outside the key frontages should be so strictly controlled, especially given the wide definition of Town Centre uses within the Framework. We object particularly to the restriction to ground floor offices (B1a) uses in these locations. The proposed changes do not consider the profound effect that online retailing is having on High Street retailing and will only lead to greater vacancies in town/district centres, which is contrary to the intention of the policy. St Martin’s Centre specifically, which forms a significant part of the District Centre and included key frontages, is committed to delivering additional retail and leisure provision which will significantly contribute to vitality and viability. That said, outside key frontages, we do not consider it effective or justified to restrict the town centre uses at ground floor level within the District Centre boundary given the Framework recognises the roles that such uses play in ‘promoting competitive town centres.’ We consider that centre uses should, in effect, relate to town centre uses as defined within the Framework given B1(a) uses for instance can activate street frontages and contribute towards creating ‘attractive diverse places where people</p>	<p>No change proposed. The background to these requirements is set out in the Local Plan Background Paper.</p> <p>The increase in Caversham reflects the fact that A1 and A2 have now been combined within the policy, as Caversham has a particularly large proportion of A2 uses such as estate agents. The current A1/A2 proportion within the key frontage in Caversham is 65%, and this allows some degree of flexibility.</p> <p>B1 offices do not make the anything like the same level of contribution to ground floor activity as other ‘main town centre uses’, and will frequently be empty at times such as weekends when the centres ought to be at their busiest. Allowing the loss of uses such as A1 to office at the ground floor would have a negative effect on the vitality of the centre. There is plenty of scope for B1 offices on upper floors.</p> <p>It should further be noted that policy RL3 does</p>

		<p>want to live, visit and work.’ There is no justification at a national policy level, nor any local evidence provided, for restricting B1(a) uses in this location. We consider the District Centres to be appropriate locations for new residential development to meet housing needs. We agree with the Council that such development should be contained to upper floors (besides appropriate residential access at ground floor level). We do not, however, consider that a similar justification can be applied for other uses such as offices where they are contained within the definition of Town Centre uses. The Framework seeks to broaden the diversity of centres, but the drafted policy is at odds with this. Centre uses should be redefined to reflect the ‘main town centre’ uses defined within the Framework. In light of all this, with reference to paragraph 182 of the Framework, we do not consider that the policy is justified in its approach to restricting town centre uses outside of the key frontages.</p>	<p>include a reference to exceptional circumstances, and the supporting text at 4.6.18 sets out that this includes where there would otherwise be long-term vacancy.</p>
Planware Ltd.	RL3: Vitality and Viability of Smaller Centres (Part B)	<p>Local Plans should “plan” positively for development, be justified, effective and consistent with the Framework. We consider that limiting the concentration of hot food takeaways would be unsound. Restricting the concentration of new A5 proposals within the borough is not a positive approach to planning. The Framework “foreword” sustainable development is about positive growth, making economic, environmental and social progress, for this and future generations. The suggested restrictions take an ambiguous view of A5 uses. It would apply an over-generic approach to restrict development with little sound planning reasoning or planning justification. This is contrary to Paragraph 14 of the Framework which advises authorities to positively seek opportunities to meet development needs of their area. Thus it is inconsistent with Paragraph 19 and 21 of the Framework. Paragraph 19 states: <i>Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.</i> Paragraph 21 states: <i>Investment in business should not be overburdened by the combined requirements of planning policy expectations.</i> The policy seeks to restrict town centre uses within designated centres.</p>	<p>No change proposed. It is not agreed that the approach of the Council is inconsistent with the NPPF, which states that “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 sequential approach, cited here, is not relevant, and is not contradicted by the proposed policy.</p> <p>There are real planning issues associated with clusters of takeaways, including impacts on residential amenity and becoming a focus for anti-social behaviour. There is no blanket ban on further A5 units (unless they are already at the 30% threshold, which is not currently the case in any centre), and there are therefore likely to be other opportunities to locate within a defined</p>

		<p>The Policy contradicts the framework and the sequential approach. The Framework cannot be interpreted to provide generic restrictions on a particular use class. Moreover, the evidence does not support such restrictions. The need for evidence is emphasised in Paragraph 158 of the Framework which states that each local plan should be based on adequate, up-to-date and relevant evidence. Compliance with the soundness test is still required. The proposal does not accord with the “golden thread” running through the Framework which seeks to build a strong competitive economy. Such a policy could potentially stifle economic development and is not consistent with the Framework. We consider that restricting the concentration of hot food takeaways would be unsound and fails to meet the four tests of the Framework. It is not a positive approach to planning, justified, effective, or consistent with national planning policy. Such a policy should therefore not be taken forward to the next stage of the plan making process. As highlighted above, there is no appropriate reason to restrict A5 uses by their concentration. The proposed policy takes no account of the sequential approach and therefore contradicts the framework. No evidence is provided to show existing A5 locations and saturation levels within centres and key frontages.</p>	<p>centre.</p> <p>The evidence for this policy, including existing levels, is set out in the Local Plan Background Paper.</p>
RBS Pension Trustee, Ltd	Policy RL5	<p>Policy RL5: Impact of Main Town Centre Use – As noted above, the Site has been developed with the overt support of the Local Planning Authority to provide retail accommodation that complements the traditional commercial premises located within the PSA of Reading Town Centre. National and local planning policy acknowledges that due to operational and floorspace requirements, large format retail warehouses cannot be located within PSAs. The sequential test therefore seeks to direct such floorspace to accessible edge-of-centre locations in the first instance. The Site meets these policy aspirations by locating within an easy walking distance of the Reading PSA and selling principally bulky non-food goods. Accordingly, while national policy advocates an impact assessment for retail proposals outside of the PSA, Policy RL5 should incorporate different thresholds for edge-of-centre</p>	<p>No change proposed. A 2,500 sq m threshold is very high in the context of the amount of existing floorspace within many of Reading’s identified centres. A site in an edge-of-centre location may well have a detrimental impact on such a centre, or on other centres. It is considered that 1,000 sq m is a reasonable, clear and consistent approach. The NPPF does not differentiate in this regard between edge of centre and out of centre locations.</p>

		<p>retail and leisure proposals. This will ensure that proposals make a positive addition to the overall retail and leisure offer of defined centres are not unduly restricted. Our proposed amendment to Policy RL5 is detailed in bold text below: ‘Proposals that include more than 1,000 sq m (gross) of new or additional floorspace for main town centre uses in an edge-of-centre or out-of-centre location should demonstrate that there will be no significant adverse impact on existing centres. Ensuring that centres within areas of deprivation are not adversely affected is of particular local importance. <i>Retail and leisure proposals on well-connected edge-of-centre sites that propose more than 2,500 sq m should also demonstrate that there will be no significant adverse impact on existing centres.</i>’</p>	
Sonic Star Properties Ltd	Policy RL6	<p>Emerging Policy RL6 seeks to protect the loss of Public Houses within the Borough. It is noted that the Council will resist the loss of A4 uses unless there is no longer a need for such a facility or the function of the facility will be fulfilled by an existing facility or re-provided as part of the development. The policy should clearly note that a reduced size of A4 unit could be considered as an acceptable way in which to re-provide an A4 unit, retaining the primary sales area at ground floor level.</p>	<p>No change proposed. It is considered that some instances is adequately covered by point b, that a facility provided as part of the development adequately fulfils the function of the facility to be lost. Where this is not the case, policy should not support a loss.</p>
Sport England	Policy RL6	<p>RL6: Protection of Leisure Facilities and Public Houses – In principle Sport England supports the inclusion of this policy, however there are a few issues we would like to raise/continue to raise around this policy: a) “There is no need for this type of facility” – the wording here is ambiguous and imprecise. I would advise direction on how to prove lack of need – the site has been marketed at the land use value for a period of not less than 18 months and local and regional/national press. Also as mentioned previously in the draft local plan response, it may be more appropriate to include a policy in the plan that specifically protects indoor and outdoor sports facilities from loss across the Borough. Sport England is also concerned that the criteria in the policy do not adequately reflect the protection for built sports facilities within paragraph 74 of the National Planning Policy Framework or circumstances relevant to sports facilities. The criteria in paragraph 74</p>	<p>No change proposed. More information on how to assess whether a facility is needed is set out in 4.6.32. The Council's view is that the criteria in RL6 comply with the NPPF on loss of sports facilities, and as such a specific policy on this matter would not add anything.</p>

		state; 'Existing open space, sports and recreational buildings and land, including playing fields, should not be built on 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 quality in a suitable location; or the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.' This is in line with NPPF. Sport England therefore objects to this policy as worded and recommends that an amendment is made to the plan to address this point.	
Theatres Trust	Policy RL6	Policy RL6 – Protection of leisure facilities and public houses: The Trust supports this policy and considers that it accords with Paragraphs 70 and 156 of the NPPF, particularly the strong presumption in favour of retaining facilities and recognition that evidence to support loss of a facility must be based on long-term issues rather than short-term economic circumstances or poor management. The requirement for alternative facilities to serve a similar role, be accessible and have sufficient capacity to serve the existing catchment will help to secure facilities for the long term social and cultural wellbeing of local people.	Noted. No change needed.
Sport England	Policy OU1	OU1: New and existing community facilities – Sport England is pleased to support this policy now since our comments on the draft Local Plan have been included.	Noted. No change needed.
Studios Construction (Reading) Ltd	Policy OU1	OU1: New and existing community facilities - We note that the Council are potentially restricting future expansion of education facilities within the draft Local Plan on page 115 under draft policy OU1. In summary therefore, the University will need to provide for higher education facilities and space on campus. Furthermore, the University may not be able to achieve proposals for additional development, if students cannot be housed in existing or planned student accommodation, on or adjoining the Campus, as the policy does not support student accommodation in other sustainable locations which may be able to serve the demand for student accommodation elsewhere. Policies H12	No change proposed. This representation is in conjunction with Studios Construction's representations on policy H12, and the response is therefore set out above. There is no indication of disagreement with the basic principle as set out in OU1 that additional students resulting from further and higher education development should be capable of being accommodated in existing or

		and OU1 therefore not only restrict student accommodation, but their interrelationship may also restrict future expansion possibilities at the University.	planned accommodation, but the disagreement is rather with whether the approach of H12 makes this possible.
University of Reading	Policy OU1	Policy OU1: The University recommends changes to this Policy in order to ensure consistency with other Policies of the Plan and in the interest of soundness. The University supports the principle of this draft policy, in particular the support the policy would provide for additional development associated with higher education and the need for such institutions to be supported by existing or planned student accommodation. It is further supported by the University that the policy as drafted supported higher education development, where there is a clear need, on sites identified for residential or other development. This relates well to the University's case that it is crucial that the draft student accommodation policy (H12) permits development of student accommodation, where there is a need, on sites which are sustainably located for access to the main University campus. In addition to the above, in line with the University's comments in relation to draft Policy H12 and the required alterations to that policy would be to reflect similar changes to paragraph 4.7.9 of the Pre-Submission Plan. The first sentence should remain consistent with other parts of the Pre-Submission Plan in recognition of not solely the delivery of housing, but also the provision of student accommodation to support the future prosperity of the University, it's position within the higher education market and its contribution through its students and research to the local and wider economy. Policy H12 should be amended to read: "This should be on existing campuses, existing student accommodation sites, or in other sustainable locations with convenient access on foot, bicycle or public transport, in line with Policy H12."	No change proposed. This representation is in conjunction with the University of Reading's representations on policy H12, and the response is therefore set out above. There is no indication of disagreement with the basic principle as set out in OU1 that additional students resulting from further and higher education development should be capable of being accommodated in existing or planned accommodation, but the disagreement is rather with whether the approach of H12 makes this possible.
Historic England	Policy OU3	Policy OU3 - Historic England would welcome the addition of a criterion to Policy OU3: "It would not result in an adverse impact on the significance of a heritage asset" as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the	Agreed. Change proposed. This reference should be added to the first criterion.

British Sign and Graphics Association	OU4: Advertisements and supporting text	<p>National Planning Policy Framework.</p> <p>The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure the emerging Local Plan policies do not apply inappropriate onerous requirements than already applied through the NPPF, PPG and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007. We commented on the Consultation Draft of this Local Plan in May 2017, but our representation is not included in the report. Generally, we are content that Policy OU4 itself reflects the law and advice in national planning policy and practice, but we remain concerned that parts of the supporting text are unreasonable and excessive. Paragraph 4.7.26 seeks to expand upon, rather than clarify, policy OU4. It picks out projecting box-type signs, bulky “folded” box fascia signs, uplighters and downlighters as “likely to detract from the character of an area.” We would wish to know what a “folded” box fascia sign is. We have never heard of this term, but internally illuminated (including fully illuminated fascia and projecting signs are common through the commercial centres in Reading Borough. An internally illuminated projecting sign must have a “box” shape (no matter how slim or whether rectangular or round) to contain a light source. And how can the preferred external illumination be achieved without “uplighters” or “downlighters” (and the text is ambiguous in saying that slim-line downlighters may be acceptable). In order to externally illuminate a sign, light will necessarily be case up or down towards the sign’s face (horizontal is generally offensive to pedestrians). Similarly, signs above ground floor level are said to be “likely to have detrimental effects on visual amenity.” These assumption are not supported by policy OU4 which, properly, requires all advertisements to be considered on individual merit in terms of size, location, design etc. We appreciate the Council’s concerns about the type and quality of advertisements, but we consider that much of paragraph 4.7.26 is misleading (though well-intentioned). We would suggest that the paragraph be deleted after the second sentence and replaced with:</p>	Partially agreed. Change proposed. It is agreed that changes should be made to 4.2.6 to reflect some inconsistencies and to avoid adding additional requirements on top of the existing policy that do not fully reflect the policy approach. The wording suggested is not wholly the same as in the representation, but it is felt that it meets the concerns expressed. The illumination levels should also be revised to reflect the most recent ILP Guidance 2015, and the last sentence of 4.2.9 should be revised to avoid conflicts with wording in 4.2.6.
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Historic England	Policy OU4	Policy OU4 - Historic England welcomes criteria a) and c) as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy OU5	Policy OU5 - Historic England welcomes the requirement in Policy OU5 Shopfronts and Cash Machines that “Features that positively contribute to the character of the building and street will be retained and, where possible, restored” and criteria a) and c) as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Berkshire	Section 5	We do not find these policies to be sound. We appreciate that Figures	Figures 5.3 and 5.5 show the areas of sensitivity

Gardens Trust		<p>5.1, 5.3 & 5.5 listed cover different areas of Reading. However, we suggest that the document would be clearer and more robust if there were closer correlation between them. Currently, there is no explicit reference to the registered status of the Forbury Gardens designed landscape, nor to the visual link between them and the surrounding 'borrowed' landscape. Also, despite the overlap between Figures 5.3 & 5.5, the former appears to limit to sensitive historic areas to only part of the Forbury Gardens and exclude the Abbey gardens and historic buildings, waterways and routes in this area which contribute to its status. Figures 5.1, 5.3 & 5.5 and policies CR3, CR13a and CR15 should contain explicit references to the registered status of Forbury Gardens designed landscape and the surrounding 'borrowed' landscape in these interrelated parts of Reading. It should be explicit that Figures 5.3 and 5.5 both cover the sensitive historic designed landscapes of the Forbury Gardens, the Abbey gardens and historic buildings, waterways and routes contributing to the historic value of this area.</p>	<p>as a graded colour starting from the closest point to likely development, therefore the whole park is shown but the colour fades across it. It is considered that this reference is adequate, and it would be a significant over complication to start to individually reference and separate out all the various types of historic significance shown.</p> <p>Policy CR13 already refers to the historic gardens. The whole purpose of CR15 is to reference the significant heritage of the area, but it is not necessary to pick all the individual elements of that out. Policy CR3 deals with provision of new public realm, and it is not clear why there needs to be the suggested reference.</p>
LaSalle Investment Management	Section 5	<p>Draft Local Plan Section 5 – Strategy for Central Reading / Station/River Major Opportunity Area / Draft Local Plan Policy CR11(a) and (b) – We continue to support RBC's wider strategy for Central Reading as set out in the Draft Policy CR11(a) and (b) and in particular support the objectives to significantly improve the wider station area as a gateway into a vibrant and successful town centre.</p> <p>LaSalle welcome the acknowledgement that large parts of the area are currently low density and that there is some inefficient uses of one of the most accessible locations in the South East (paragraph 5.4.1). At paragraph 5.2.15 it is stated that there is "undoubted physical capacity within the centre to incorporate a significant level of new development, by efficient use of underused land through carefully developing at higher densities".</p> <p>This statement is fully supported along with the conclusion at paragraph 5.4.4 that "in order for the station area to become a destination in its own right, it should contain a wide mix of uses across the area".</p>	Noted. No change needed.
RBS Pension	Section 5	Central Reading – We support the continued designation of the Site as	Noted. No change needed.

Trustee, Ltd		forming part of Central Reading. The site has been developed with the overt support of the Local Planning Authority to provide retail accommodation that complements the traditional commercial premises located within the Primary Shopping Area (PSA) in Reading Town Centre. It ensures that the town can accommodate and benefit from a comprehensive range of retail operations to meet the requirements of local residents.	
Historic England	Paragraphs 5.1.1, 5.1.2, 5.1.7	Paragraphs 5.1.1, 5.1.2 and 5.1.7 - Historic England welcomes these paragraphs for their description of the heritage of Reading town centre as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
K2 Developments	Section 5.2	5.2 Strategy for Central Reading – The Friar St and Station Rd areas is identified as a major opportunity area where low-quality and underused areas would benefit from well-designed development. We agree. However, we feel it prudent to stress that given the emerging Local Plan includes former allocations from the CAAP which have failed to come forward to date, policy wording should allow flexible land uses to come forward to avoid compromising the viability or deliverability of key sites within the town centre. Furthermore, there needs to be a commitment from the LPA to ‘work proactively with applicants to secure developments that improve the economic and environmental conditions of the area’ especially through the determination of applications.	No change proposed. Policy wording in the Central Reading section is worded to be as flexible as possible to achieve regeneration, whilst recognising that there are still some important parameters which need to be set out. The Council already seeks to work proactively with developers, and section 10 emphasises the importance of early and effective pre-application discussions.
Historic England	Paragraph 5.2.1	Paragraph 5.2.1 - Historic England welcomes and supports key principle i) in paragraph 5.2.1 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Paragraph 5.2.11	Paragraph 5.2.11 - Historic England welcomes and supports paragraph 5.2.11 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.

Aviva Life and Pensions UK Ltd	Figure 5.1	Figure 5.1 – Whilst the principle behind the purpose of the figure is supported, the graphics and the scale of the plan, even when read alongside paragraph 5.2.11 – 5.2.4, result in some uncertainties over interpretation. These uncertainties were raised in June 2016 during the previous consultation and the plan remains unchanged. We consider that figure 5.1 should be clarified as for example, we note that land north of Reading Station is not entirely covered by ‘for retail’ or ‘for offices’ and Forbury Retail Park only partially lies within a concentration ‘for retail.’	Agreed. Change proposed. The key should be amended to clarify that areas shown on the map are approximate only, and that definitive boundaries are shown on the Proposals Map.
Moorgarth Group Limited	Figure 5.1	Area Strategy for Central Reading – As per our response to the last consultation, Figure 5.1 should be amended so that the areas defined for concentration of retail, offices and leisure uses fully encompass the whole of the Broad Street Mall and Fountain House site. The site is an important retail, office and leisure hub within central Reading and this should be reflected in the Area Strategy plan. As drafted, the boundaries of these concentration areas cut across the site and therefore should be amended.	Partly agreed. Change proposed. The key should be amended to clarify that areas shown on the map are approximate only, and that definitive boundaries are shown on the Proposals Map.
Aviva Life and Pensions UK Ltd	Policy CR1	CR1 – Aviva supports the policy and supporting text that support will be provided for a mix of uses coming forward on sites within the designated area.	Noted. No change needed.
K2 Developments	Policy CR1	CR1: Town Centre Uses – We do not consider that this policy accords with the requirements of the Framework at paragraph 26. First, the ambiguity over the Central Area marking ‘the edge of the town centre in most cases’ should be re-worded to provide more certainty and state that the Central Area of Reading boundary is set out on the proposals map. This is of importance, given that the Pre-submission Local Plan as currently drafted fails to define a town centre boundary for Reading (as required under paragraph 23 of the Framework). In addition, CR1 seeks to apply the sequential test for ‘main town centre uses’ across Central Reading without acknowledging the presence of a town centre boundary. We consider that the town centre should be defined on the	Partly agreed. Change proposed. This wording should be clarified. However, it is considered that the boundaries as defined are appropriate for application of the sequential test, to ensure that those uses which attract the greatest number of uses are located in the areas of greatest accessibility where they can make the strongest contribution to the vitality and viability of the centre.

		proposals map which allows 'main town centre' uses to come forward within areas without the need to apply the sequential test. Our site is within this area and forms part of an existing designated primary frontage, both of which from a policy perspective would support retail uses at the ground floor level to encourage active uses along Station Road. With regard to the location of 'major office development' referenced within CR1 we would highlight that paragraph 26 of the Framework only requires the sequential assessment to be applied on sites outside of town centres. In this context, a proposals map for the Central Reading Area should be produced to provide a holistic view of the specific designations within this area. At present, the proposals map fails to 'illustrate geographically the application of policies within the development plan.' We consider that the phrasing of the above policy requires further clarity.	
Stanhope Plc	Policy CR1: Definition of Central Reading	Stanhope Plc supports the Council's definition of Central Reading.	Noted. No change needed.
Aviva Life and Pensions UK Ltd	Policy CR2	CR2 – Aviva welcomes the policy which seeks to encourage good quality design within the central area of Reading.	Noted. No change needed.
Historic England	Policy CR2	Policy CR2 - Historic England welcomes Policy CR2, particularly attribute d), but we would also welcome a further attribute: "Development will conserve and enhance the historic environment of the centre and the heritage assets therein", as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	No change proposed. This matter would be adequately covered within policies CC7 and EN1 and does not need repetition here.
Historic England	Paragraph 5.3.5	Paragraph 5.3.5 - Historic England welcomes paragraph 5.3.5 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Aviva Life and Pensions UK Ltd	Policy CR3	CR3 – We consider an element of flexibility should be introduced into policy CR3i. The policy should read "Except in exceptional	No change proposed. These requirements are important, and it is therefore difficult to see on

		circumstances...”	what basis there should be a flexible approach.
Environment Agency	Policy CR3	CR3: The first sentence of point iv of this policy should be amended to read: “The design of developments adjacent to a watercourse, including the refurbishment of existing buildings, will be required to enhance the appearance and ecological value of the watercourses...” In the last sentence of point iv of this policy, please replace ‘waterways’ with ‘watercourses’ (all were amended in iii and iv apart from this one instance).	No change proposed. Ecological enhancement is dealt with elsewhere in the plan. This part of the policy is specifically referring the appearance of the space.
Historic England	Policy CR3	Policy CR3 - Historic England welcomes and supports Policy CR3 Public Realm in Central Reading, especially criterion v. as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework, although we would prefer the criterion to read “...and the significance of heritage assets...”.	Agreed. Change proposed. This reference should be added.
Sonic Star Properties Ltd	Policy CR3	Emerging Policy CR3 seeks to ensure that development makes a positive contribution towards the quality of the public realm in the central area of Reading. It notes that development sites over 1 ha will be required to provide new public space or civic squares and smaller developments will contribute towards improvements to the public realm. We note in supporting paragraph 5.3.11 the Council go on to identify that, “Improvements to the public realm may include works such as the provision of open space, the improvement of pedestrian access to existing open space, the provision of landscaping and green infrastructure, and wider streets that act as open space.” Given the constraints of sites under 1 ha, it is unreasonable for the Council to request on site public open space from smaller sites. We would request that this reference is removed and the Council rely upon their CIL Receipts to enhance access to open space (open space is identified on the Council’s Draft Regulation 123 List).	No change proposed. There is no requirement for on-site open space below 1 ha in the plan. There is a requirement for public realm enhancements. On-site open space may be part of this, where there is the potential to provide it, or equally it might involve other types of provision such as those listed in 5.3.11. As far as relying on CIL receipts is concerned, this will be of no help in enhancing access to open space if there are no sites where open space can be provided.
K2 Developments	Policy CR4	CR4: Leisure, Culture and Tourism in Central Reading – As drafted, there is requirement for further clarification over the town centre boundary and consistency with the proposed allocations as to where retail and	Agreed. Change proposed. The supporting text can make reference to there being significant opportunities for leisure and visitor

		leisure development will be appropriate. The plan will fail to achieve sustainable development as currently drafted given there is no evidence of how the leisure, hotel and retail need can be accommodated within the Local Plan. As currently drafted, the policy is not considered to be positively prepared, justified or effective nor consistent with national policy and required under paragraph 182. We consider that with further clarification as suggested within Section 4, the tests of soundness could be achieved.	accommodation within the centre.
Aviva Life and Pensions UK Ltd	Policy CR6	CR6 – Aviva welcomes the policy, which was integral to the Central Area Action Plan, and recognises that the provision of residential development can help to diversify the centre and help support its long-term viability through an increase in population in the centre.	Noted. No change needed.
Moorgarth Group Limited	Policy CR6	CR6: Living in Central Reading – The suggested approach for a specific residential mix in the Central Reading area is supported. However, in seeking to further distinguish Central Reading’s locational context and residential market requirements, it should be noted that the town centre is not generally suitable for family housing, and therefore the suggested residential mix is flexible.	Noted. The figures set out in CR6 are a guide, and there is therefore inherent flexibility within the policy.
SGN and Danescroft	Policy CR6	CR6: Living in Central Reading - This policy sets out a number of detailed criteria which proposals for residential development within the central area will be assessed against. In particular, on developments of 15 dwellings or more, the policy states that, “as a guide”, a maximum of 40% of units should be 1-bed/studios and a minimum of 5% of units should be at least 3-bed “unless it can be clearly demonstrated that this would render a development unviable”. The flexibility that has been accordingly built into this policy is supported and welcomed. The Local Plan is intended to cover the period up to 2036. Whilst the guidance on housing mix that will be expected by the Council is helpful, it may not necessarily reflect the mix requirements in the future whilst the Local Plan is still in place. To ensure the policy is adaptable to changing conditions and remains effective over the whole plan period, the	No change proposed. It is considered that failing to meet market demand would fall under the banner of a development not being viable. It is considered that CR6 has sufficient built-in flexibility.

		following amendments are therefore proposed: “ [...] unless it can be clearly demonstrated that this would render a development unviable <u>or would fail to meet current market demand.</u> ”	
Stanhope Plc	Policy CR6: Living in Central Reading	The draft policy sets out a suggested housing mix specifically for the Central Reading area – this approach is supported to differentiate the locational context and residential market requirements for this part of the Borough. With that in mind, it should be noted that Central Reading is generally not suitable for family housing and that the target housing mix is flexible and should be considered on a site by site basis.	Noted. No change proposed. It is not agreed that Central Reading is necessarily unsuitable for family housing, and there are many families currently living in the centre. However, it is clear that in many cases families will wish to live elsewhere, which is why the proportion of 3-bed units is substantially reduced from policy H2. As stated in the representation, there is an inherent flexibility in the approach
K2 Developments	Policy CR7	CR7: Primary Frontages – This policy is supported, although as noted above should be within the context of a town centre boundary.	Noted. No change needed.
Stanhope Plc	Policy CR7: Primary Frontages in Central Reading	The designated primary frontages (existing) shown on the draft proposals map within CR11c bear no resemblance to the existing situation or building frontages and should therefore be removed. The designated primary frontages (proposed) could be shown insofar as they correlate with the approved parameter plans under the extant Station Hill consent. Furthermore, active building frontages should not necessarily need to include a display window or glazed frontage at ground floor level – this wording should be deleted.	No change proposed. No existing primary frontages are shown on the Station Hill site other than the Friar Street frontage, which is not proposed to change. The proposed primary frontages show a frontage to Station Square South and a link from the Station through the site in a NE-SW direction. These are general routes and are not expected to necessarily be implemented exactly as shown on the proposals map.
Sonic Star Properties Ltd	Policy CR8	Draft Policy CR8 notes that small shop units are important for Town Centres and specifically identifies that the loss of smaller shop units (under 75 sq. m) will not be permitted. It does not however account for any changes or flexibility in the retail market through a tested approach. In this instance we are referring to arcades in particular, which have been vacant for a significant period of time providing no active contribution towards the role or function of the Town Centre. This policy should be amended to allow for changes in market demand, particularly in town centre locations to avoid vacant units. The policy as	No change proposed. The smaller shop units are a key part of the diversity of the offer of the town centre, and, the case of the Victorian arcades, of the heritage of the town centre. Reading is well-known as a destination for large multiple retailers, but there is a perception that smaller independent shops are in shorter supply. A diverse range of units across the centre helps to ensure a healthy and diverse town centre, and

	<p>currently worded, indicates that the Council would rather have vacant units in the town centre than promoting retail units that are easier to occupy and therefore ensuring that the continued retail function of Reading town centre is maintained. This is directly contrary to the objectives of the Draft Pre-Submission Local Plan for Reading as a regional centre being the primary centre in the Borough (Draft Policy RL1). Para 4.6.2 of the Draft Local Plan endorses this in stating, “Reading is clearly by far the dominant centre within the borough and for much of the surrounding area. It is the centre where the vast majority of the town centre development will occur”. Draft Policy CR8 therefore is in direct conflict with the ambitions of Draft Policy RL1 to maintain Reading as a Regional Centre and the paragraph 23 of the NPPF. Typically, there is a policy test for changes to commercial properties which is tested through marketing evidence. This has been proposed in Draft Policy EM3 for any changes to office accommodation, and it is suggested that a similar approach could be adopted for retail properties. In this instance the policy must be flexible to meet changes in market demand for retail floorspace, particularly in key shopping areas in order to maintain their vitality and viability. This could be evidenced through robust marketing evidence i.e. 18 months to demonstrate that the floorspace is no longer viable. The consultation on the emerging Local Plan has been supported by a number of technical reports including a Retail and Commercial Leisure Assessment undertaken in 2016 and published in April 2017 for the Western Berkshire Authorities. Paragraph 4.4 of the Assessment highlights the changes to retailer space requirements since the greater dependence on internet shopping. The report identifies that retailers are now focusing their growth programmes on having a large flagship store in strategic locations with smaller stores in satellite locations. This has been supported by our own research into retailers who are actively searching for retail floorspace in Reading Town Centre. On this basis, we have suggested an alternative wording for Policy CR8 for the Inspector to consider,</p> <p>“Shop units make an important contribution to the diversity of the</p>	<p>it is not agreed that the policy is in conflict with policy RL1 in any form. If there are exceptional circumstances why compliance with the policy would result in long-term vacant units, this will need to be tested through the development management system. However, it is felt that a strong statement on this issue is required.</p>
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		<p>centre. Some areas of the centre are particularly characterised by small units, of less than 75 sq. m. These include the arcades, Cross Street, Queen Victoria Street, Union Street, and any other areas designated in the function. Within the areas characterised by small shop units, the amalgamation of individual shop fronts will not be permitted unless it is demonstrated, to the Council’s satisfaction, through robust marketing evidence of a minimum of 18 months that the floorspace is no longer viable or that there is a lack of demand.</p>	
<p>Greyfriars Church</p>	<p>Policy CR9</p>	<p>We do not think this policy is legally compliant or that it fulfils the duty to co-operate. As drafted, policy CR9 is inconsistent with the approach to the protection of designated and non-designated heritage assets as set out in national planning policy. The plan is therefore unsound being neither consistent with national policy nor justified, as it is not the most appropriate strategy. Paragraph 133 of the NPPF allows ‘substantial harm’ to the significance of a designated heritage asset to arise where it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Paragraph 134 of the NPPF indicates that ‘less than substantial harm’ should be weighed against the public benefits of a proposal that affects a designated heritage asset, including securing the optimum viable use of that heritage asset. Paragraph 135 of the NPPF confirms that when weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. In each case harm may be acceptable if it is outweighed by benefits including public benefits. In contrast, draft policy CR9 (which essentially deals with non-designated heritage assets) requires that development should not result in the loss, or have a detrimental effect on the character, of the areas that policy CR9 applies to. This is an absolute restriction, in contrast to the planning assessment of harm against public benefits that the NPPF advocates. Amend policy as follows: “Development should not result in a loss, or have a detrimental effect on the character of, these areas <u>other than where provided for in</u></p>	<p>No change proposed.</p> <p>There is a distinction between the protection of heritage assets, as dealt with in paragraphs 133 and 134 of the NPPF, and recognition of areas of particular character. Paragraph 5.3.33 makes clear that these areas are not identified for their historic interest, but for their contribution to town centre character. These are not designated heritage assets, and as such are not regulated by paragraphs 133 and 134. One of the Core Planning Principles in paragraph 17 of the NPPF is that “take account of the different roles and character of different areas”, whilst paragraph 60 states that “it is, however, proper to seek to promote or reinforce local distinctiveness”.</p> <p>It is not clear how this fails the duty to co-operate.</p>

		<u>national planning policy.”</u>	
Historic England	Policy CR9	Policy CR9 - Historic England welcomes and supports Policy CR9 Terraced Housing in Central Reading as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Aviva Life and Pensions UK Ltd	Policy CR10	CR10 - Aviva welcomes the policy and encourages provision for additional tall buildings in specific parts of the centre. Aviva welcomes the criteria in CR10a (ii) and (v) that sets out the framework for tall buildings in the area and is pleased that the Council acknowledges that tall buildings are not appropriate in all locations within the centre, but that they are best located in accessible locations such as in the area around the Reading train station.	Noted. No change needed.
Historic England	Policy CR10	Policy CR10 - Historic England welcomes the requirement in Policy CR10 for tall building proposals to “preserve and, where possible, enhance the setting of conservation areas and listed buildings”, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework. However, we prefer “conserve” to “preserve” as terminology more consistent with the National Planning Policy Framework and as recognising that sensitive change can take place that maintains or even enhances the significance, or appreciation of the significance, of heritage assets.	Agreed. Change proposed. The terminology should be changed.
K2 Developments	Policy CR10	CR10: Tall Buildings – This policy is supported. We consider such a reference to the opportunities for 29-35 Station Road to come forward as a landmark building for Reading should be included within policy CR11a to acknowledge this opportunity.	Noted. No change needed. This policy approach does not generally seek to identify particular opportunities for landmarks within the core of the cluster, as this is a detailed matter. The Reading Station Area Framework, which remains in place, provides more detail on landmark locations.

Mapletree Investments Pte	Policy CR10	<p>CR10: Tall Buildings – GPR maintains their position (as per the previous representation) that the evidence base to support the tall building strategy is out of date. Paragraph 3.12 of the IDF references the Plan’s approach to focus additional employment development in the town centre and along the A33. In order to achieve this ambition, higher density development should be focused in locations such as Green Park, in order to meet employment requirements over the Plan period. There should be some flexibility in the policy to allow for a tall building in this important employment location. As Green Park becomes more accessible with the introduction of the train station, and its back drop will soon be much more urban in nature as a result of the Royal Elm Park development, there is an opportunity to create more of a statement or landmark on the Park. GPR’s agents would also support this approach in order to increase the Park’s visibility on the M4 which would help with marketing.</p>	<p>No change proposed. A Tall Buildings Strategy Update Note was prepared in 2018, and this demonstrates that the findings of the Tall Buildings Strategy remain generally relevant.</p> <p>It is not agreed that tall buildings are appropriate outside central Reading. Densities should be highest where the level of accessibility is greatest, and where effects on landscape and townscape are acceptable, and this will not be on the fringes of the town. Very efficient use of land can be achieved without tall buildings.</p>
Ropemaker Properties	Policy CR10	<p>Policy CR10: Tall Buildings – We do not consider this policy to be legally compliant, sound, or that it fulfils the duty to co-operate. We wish to raise an objection. Within previous Consultations we have set out our concerns that the evidence base for this policy has not been updated from the original 2007 Report on tall buildings. This policy is therefore overly restrictive and out of date. The wording of the policy is almost identical to the Central Area Action Plan which was adopted in 2009 (pre-NPPF). Paragraph 158 of the NPPF is clear that Local Plans need to be based on “adequate, up to date and relevant evidence about the economic, social and environment characteristics and prospects of the area.” Since the publication of the original report in 2007, the sky line in Reading has/is changing significantly with development permitted within the Station Quarter, and the erection of Chatham Place, amongst others. Basing the text of this policy on a report which is over 10 years old is clearly not in accordance with paragraph 158 of the NPPF. With the general thrust of government policy and the need for Reading to meet its OAN, the Tall Building Strategy needs to be reviewed and updated to allow for increased density in the Centre of Reading, which is</p>	<p>No change proposed.</p> <p>A Tall Buildings Strategy Update Note was prepared in 2018, and this demonstrates that the findings of the Tall Buildings Strategy remain generally relevant. The skyline may have changed, but it has changes in a way anticipated by the Tall Buildings Strategy. No buildings over 10 commercial storeys have been built or are permitted that are not in accordance with the existing tall buildings policy that emerged from the Tall Buildings Strategy, whilst some were already permitted at the time the Strategy was drafted.</p> <p>Tall buildings are not the only way to achieve high densities, and densities which make the most of the area’s very high levels of accessibility</p>

		<p>a highly sustainable location. The land to the north of Chatham Street at Weldale St is considered to be a suitable location for a tall building, the proximity of the site to the Chatham Street tower would help to create a cluster. The Weldale St site is located within character area 13 which is a significant area comprising of two Major Opportunity Areas as defined by the Central Area Action Plan. This assessment suggests that the “degraded townscape condition all contribute to a high capacity for the development of tall buildings.” Whilst it is appreciated that not all of this area could accommodate a tall building, the southern half of the character area at Weldale St could comfortably accommodate a tall building and help to contribute to the overall vision for the western area. The NPPF at paragraph 182 sets out a number of tests which must be met before a plan is considered sound and the following comments can be set out in relation this this:</p> <ul style="list-style-type: none"> • Positively prepared – The policy is based on outdated evidence. The Council should be looking to meet its full OAN and therefore it should be looking at opportunities to increase density, particularly within the town centre. • Justified – The evidence is over 10 years and no evidence has been provided to demonstrate that it is still relevant. • Effective – Whilst it is acknowledged that the policy has met some of its original objectives, it has clearly not been effective in all areas. For example, the western cluster was originally intended to have a number of tall buildings, most notably building over the IDR. To date only one tall building has come forward and as such the original vision has not been realised over the plan period of the CAAP and it should not be repeated verbatim in a new Local Plan without additional evidence to support it. • Consistent with National Policy – Clearly the restrictive nature of this policy does not accord with the thrust of national policy which is looking at building at higher densities, especially around transport hubs. The arrival of Crossrail and existing 	<p>can be achieved without a reliance on tall buildings, which, where inappropriately sited, have an effect on townscape and landscape far beyond their own bounds. This matter is considered in more detail in the Tall Buildings Strategy Update Note.</p> <p>It should be noted that a resolution to grant permission subject to the signing of a S106 agreement was made in November 2017 on the site which is the subject of this representation for 427 dwellings (ref 170326), which achieves high density but does not include a tall building. The S106 was signed and permission issued in March 2018.</p>
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		transport links means that Reading should be embracing tall buildings.	
SSE Ltd	Policy CR10	<p>We do not believe that the Local Plan is legally compliant or sound. CR10: Tall Buildings – Central Reading has been earmarked to deliver 7,600 homes (along with 71,000 sq. m of office space and 27,000 sq. m of retail space) over the Plan period to 2036, which equates to nearly half the total number of homes being planned for in the PSLP. The Station/River Major Opportunity Area (SRMOA) has been earmarked for major regeneration in the adopted Reading Central Area Action Plan (2009) (AAP) to bring about the Council’s Local Plan objectives. To deliver this it is anticipated that development will come forward at high densities to ensure that the growth needs of Reading are met. Key to this is the Station quarter and the associated Station Tall Building Cluster (STBC), as defined by Policy CR10 of the AAP and the Proposals Map. Within this area buildings exceeding 10 storeys for office and 12 storeys for residential are permitted (defined as Tall Buildings in the AAP).</p> <p>With the exception of some inconsequential changes to the text, draft Policy CR10 of the PSLP repeats the Council’s existing tall buildings policy (RC13 of the AAP). It continues to define tall buildings as 10 storeys of commercial floorspace or 12 storeys of residential (equating to 36 metres tall) or above, and that tall buildings will only be permitted within the three ‘areas of potential for tall buildings’, i.e. the Station Area Cluster, Western Grouping and the Eastern Grouping (as identified on the Proposals Map). The Sustainability Appraisal examines four policy options for Tall Buildings, including no policy (Option i), continue current policy (Option ii), amend policy approach to include more scope for tall buildings (Option iii) and amend to further limit scope for tall buildings (Option iv). Option (iii) is the preferred option and states that it provides for additional scope for tall buildings. SSE has compared draft Policy CR10 with adopted Policy RC13 (and the respective supporting text) and can find no changes of any substance that would provide “additional scope for tall buildings”.</p>	<p>No change proposed.</p> <p>It is accepted that CR10 largely carries forward the approach in RC13. RC13 has been very successful in guiding the approach to tall buildings in Reading, and those that have been built or permitted are in line with it. There is no need to abandon this strategy part way through its implementation. A Tall Buildings Strategy Update Note was prepared in 2018, and this demonstrates that the findings of the Tall Buildings Strategy remain generally relevant. The skyline may have changed, but it has changes in a way anticipated by the Tall Buildings Strategy. No buildings over 10 commercial storeys have been built or are permitted that are not in accordance with the existing tall buildings policy that emerged from the Tall Buildings Strategy, whilst some were already permitted at the time the Strategy was drafted.</p> <p>Tall buildings are not the only way to achieve high densities, and densities which make the most of the area’s very high levels of accessibility can be achieved without a reliance on tall buildings, which, where inappropriately sited, have an effect on townscape and landscape far beyond their own bounds. This matter is considered in more detail in the Tall Buildings Strategy Update Note.</p>

	<p>AAP Policy RC13 is informed by the Reading Tall Buildings Strategy (TBS) published in January 2008. That document is 10 years old and Central Reading has seen significant change during the intervening period, in terms of its growth needs, urban context and public transport accessibility. It is our view that to simply repeat adopted policy restrictions within a rapidly changing urban environment and in the current housing climate, without any technical assessment, fails to plan positively for Reading’s current and future growth needs and is therefore fundamentally flawed. Notwithstanding this, in light of the Council’s preferred approach SSE has reviewed the TBS, SA and draft Policy CR10 in detail and would raise the following points. The TBS adopts the approach that ‘tall’ is 10 commercial storeys or equivalent. This informed the threshold in AAP Policy RC13, which has been incorporated in draft Policy CR10 of the PSLP. However, what is tall in one context may not be termed tall in another. CABE ‘Guidance on Tall Buildings’ (2007) offers no definitive definition for tall buildings. Instead it refers to context, i.e. that a 10 storey building could be deemed as ‘tall’ in the context of two storey Victorian terraces, whereas it may not be seen as such within a city centre. The criteria for assessing tall buildings in the CABE guidance explains that it is intended for buildings that are substantially taller than their neighbours and/or which significantly change the skyline. It is therefore our view that adopting a blanket approach to defining what constitutes a tall building across Reading is too crude, particularly in light of its new urban landscape emerging in the town centre. Paragraph 5.2.15 of the PSLP states that Central Reading has physical capacity to incorporate a significant level of new development at high densities. As a consequence paragraph 5.2.16 states that central Reading will accommodate 7,600 homes (along with 71,000 sq. m of office space and 27,000 sq. m of retail space) over the plan period to 2036, which equates to nearly half the total number of homes being planned for in the PSLP. Tall buildings have already been planned for within the three central area clusters. However, SSE considers that there to be scope to review this across all three areas,</p>	<p>The representation states that “Matters such as the transition in scale between any tall buildings and adjacent lower rise development could be appropriately dealt with at planning application stage”, however, we contend that this is a central issue in some locations which could not simply be negotiated through the application process. No part of the Riverside site that forms the focus of SSE’s representations is more than 100m away from the rear of two-storey residential, and therefore it is entirely appropriate to place this outside the Tall Buildings Cluster.</p> <p>Policy cannot allow ‘tall’ to be determined on a case by case basis. There needs to be some degree of certainty on how a policy can be applied rather than leaving it to be determined on a case by case basis, requiring a full analysis of the site and its surroundings to be carried out and evaluated before it is even clear whether a policy applies. The ten storey definition is pragmatic, justified in the TBS, and appropriate for Reading.</p>
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		<p>particularly the Station Cluster, in light of the strategic importance placed on the central area to deliver growth and in view of the points raised above. In considering the suitability of Central Reading to accommodate tall buildings the TBS assessed the townscape character, visual amenity (both within central Reading and into central Reading), historical significance, environmental constraints and market demand. This is a sensible starting point for considering the suitability of the STBC for expansion. The TBS concludes at Figure 4.1 (page 14) that the SRMOA has townscape capacity for tall buildings (Area 22 shaded in brown). In topographical terms, the TBS concludes on page 15 that there are no topographical reasons to restrict tall buildings in the Central Reading area, including the SSE site, stating that: <i>“The central area of Reading is fairly consistent in terms of topography. Topography does drop towards the River Thames and the River Kennet, but the change in topography is not marked. There is therefore no one particular area which is any more or less appropriate in terms of topography itself.”</i></p> <p>In relation to environmental constraints such as flooding, the TBS concludes that the Council’s Draft Strategic Flood Risk Assessment for Central Reading land within Flood Zone 3 would not be suitable for tall buildings, stating on page 16 that: <i>“Due to potential flood risk, no tall buildings could be developed within zones 3b and constraints may apply to development of tall buildings within zone 3a.”</i> The Environment Agency Flood Map confirm that the majority of character area 22 is in Flood Zone 2, and the Council’s Sequential and Exceptions Test of sites in the PSLP (dated December 2017) confirms that the draft allocations in the SRMOA pass the sequential and exceptions tests and are suitable for development. In terms of historical significance the TBS identifies the historic core of Reading as sensitive to tall buildings. It concludes at page 19 that: <i>“The prospect of locating tall buildings within the Reading central area will clearly need to be mindful of the sensitivity of the historic core area, but there is an opportunity to consider locations in close proximity in order to re-establish an architectural focus that might</i></p>	
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		<p>contribute to efforts to more clearly express the significance of the surviving medieval urban form.” Adding that: “Clearly this would be a challenging prospect, however, if integrated in a fashion that engaged with and helped articulate the historic core area, it could play a significant role in sustaining the local historic environment.” The TBS confirms at Figures 4.3 and 4.4 that the area does not lie in any high sensitivity local or long range views. Townscape and Visual Assessment examined Character Area 22: Vastern Road (page 37) and concludes that townscape sensitivity in this area was low, stating that: “The large block size which exists within the character area and the absence of any key views or visual focal point makes this an appropriate location for tall buildings.” The TBS concludes overall that the character area has high overall suitability to accommodate tall buildings, stating that: “The large block size which exists within the character area and the absence of any key views or visual focal point makes this an appropriate location for tall buildings. There are no key views which could be blocked by development of tall buildings. In order for tall building development within this area to be viable in terms of market considerations, there would need to be associated public realm enhancements and enhanced accessibility to improve market perception of the area.” Although in recognition of the adjacent domestic scale residential properties the TBS comments that tall buildings should not be developed on the north and western edges of the character area, it is our view that this could still be maintained while allowing for taller buildings to come forward in areas of strategic importance, such as around key nodes and strategic movement corridors. Matters such as the transition in scale between any tall buildings and adjacent lower rise development could be appropriately dealt with at planning application stage. On the basis of the above, SSE are of the view that the Council has ignored its evidence base in not at least considering the option of expanding the boundary of the STBC.</p> <p>Having regard to the suitability of character area 22 to accommodate tall buildings as assessed in the Council’s TBS, and the enhanced</p>	
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		sustainable travel accessibility credentials of the SRMOA with the arrival of Crossrail, the Mass Rapid Transit and the north/south movement corridor, SSE consider that the emerging draft Policy CR10 should be amended to extend the STBC to include all land within the SRMOA and thus enable Reading to realise its ambitions as a regional capital for growth and sustainability. We would therefore request that draft Policy CR10 and the Proposals Map be amended to extend the STBC boundary to cover all of the SRMOA.	
Stanhope Plc	Policy CR10: Tall Buildings	The draft policy defines tall buildings as over 36m in height, whilst the boundary of the 'areas of potential for tall buildings' lies through the middle of the Station Hill Site, excluding the southern plots. However, the Council has already considered it acceptable for taller buildings outside of this zone, whereby the extant permission has approval for buildings of up to 45m in height within the southern plots of the Site. The policy should therefore be relaxed, with part i) of the policy reworded to 'tall buildings will generally only be appropriate...' The supporting text relating to sustainable design and construction (paragraph 5.3.46) refers to narrow span floor plates improving the availability of daylight and reducing the need artificial light. It is important to also recognise, however, that larger floorplates allow buildings to be more efficiently laid out, permitting efficiencies in construction and can be more efficient to heat. High density and tall buildings located adjacent to transport interchanges, such as Site CR11, are also inherently sustainable because of their central location which can be served by public transport and take advantage of the proximity of other uses in the town centre.	No change proposed. The situation with the Station Hill approval is recognised, but this slight breach in the policy is within the context of reducing the height in a north to south direction to ensure a satisfactory relationship with Friar Street. In this sense, material considerations led to a small exception to the policy approach (which was in place at the time) to achieve a satisfactory overall development, and future considerations would need to be undertaken in a similar manner. It should not indicate a need to relax the whole policy, which could lead to many more instances of tall buildings outside identified clusters.
Viridis Real Estate Services Ltd	Policy CR10	Policy CR10: Tall Buildings - Our client made detailed representations in relation to Policy CR10 in its FDLP consultation response (pages 9-11). The Council has made no changes to Policy CR10 in the current consultation document and has not reviewed its evidence base to understand whether any updates could be made to deliver more homes in the most sustainable locations. In response to Viridis' FDLP representations the Council's SoC document states that: " <i>Whilst the Tall</i>	No change proposed. CR10 largely carries forward the approach in RC13. RC13 has been very successful in guiding the approach to tall buildings in Reading, and those that have been built or permitted are in line with it. There is no need to abandon this

	<p><i>Buildings Strategy is now almost 10 years old, it is still of significant relevance given that it refers to townscapes that in many cases are largely unchanged from what was planned at the time – in fact, in the case of 42 Kenavon Drive, adjacent to the site in question, the development delivered is actually on average of a significantly lower density than what was permitted at the time. Age by itself does not render a document out of date, and no specific reasons why the Strategy is out of date have been given.”</i></p> <p>Notwithstanding the Council’s comments, we maintain the view that there is significant justification for the Council to review its current approach to tall buildings. Reading is undergoing rapid change and its urban context has evolved since adoption of the Central Reading Area Action Plan in 2009, and publication of the Reading Tall Buildings Strategy (TBS) in January 2008. This is not to say that these documents no longer have relevance rather that the particular needs of Reading are such that it is only right that the Council consider whether its approach to tall buildings is delivering sustainable development to meet the needs of Reading at the rate needed. Furthermore, it may be that the emerging townscape needs to be considered following commencement and completion of a number of large buildings. Our client’s position is that the Council should review its strategy and consider whether in new urban quarters such as the East Side Major Opportunity Area can support tall buildings. The Council’s own TBS recognised the potential for taller buildings in this area, stating that: <i>“The area is characterised by large blocky structures. Therefore a tall building would not appear uncharacteristic in terms of urban grain and townscape scale. There are few key views which characterise the area and therefore tall buildings would not jeopardise the visual experiences of the area. However, there are no buildings over 10 storeys within the area. A significantly taller building would become visually prominent, although assuming careful consideration is given to the design and placing, the building could provide focus to the area.”</i> The context of the East Side Opportunity Area has evolved since the TBS with the completion of 42 Kenavon</p>	<p>strategy part way through its implementation. A Tall Buildings Strategy Update Note was prepared in 2018, and this demonstrates that the findings of the Tall Buildings Strategy remain generally relevant. This has taken account of changes to the local area, including 42 Kenavon Drive and Kings Point. The skyline may have changed, but it has changes in a way anticipated by the Tall Buildings Strategy. No buildings over 10 commercial storeys have been built or are permitted that are not in accordance with the existing tall buildings policy that emerged from the Tall Buildings Strategy, whilst some were already permitted at the time the Strategy was drafted. With 42 Kenavon Drive to the east rising to 8 residential storeys, and the highest point of the permitted Homebase/Toys R Us development to the west being 11 residential storeys, and this gradual rise from east to west being reflected across the railway for Napier Road, and on the office developments north of Forbury Road, there is a clear pattern across the area. The position therefore remains that this would not be an appropriate location for a tall building.</p> <p>Tall buildings are not the only way to achieve high densities, and densities which make the most of the area’s very high levels of accessibility can be achieved without a reliance on tall buildings, which, where inappropriately sited, have an effect on townscape and landscape far beyond their own bounds. This matter is</p>
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		<p>Drive, which rises to 8 storeys and is clearly visible in views from the north, and the construction of Kings Point to the south, which will be 18 storeys when complete. This latter building is already prominent in views from Kings Meadow to the north of allocation CR13c and when complete will form part of a newly emerging and dynamic skyline. These developments should be taken into consideration in preparing any policy on tall buildings. These factors show that the Council has not had sufficient regard for its own evidence base and erred in not planning positively for the known pressures on the town to deliver 699 homes per annum. Based on the PSLP draft allocations the East Side Major Opportunity Area is envisaged to deliver a minimum of 2190 homes over the plan period, which can only be considered to be of strategic importance to Reading in both housing delivery and regeneration terms. This alone is reason to consider the case for tall buildings in this new residential led quarter, which among other things will now, as part of the Toys R Us scheme, accommodate a new frontage to the river, with leisure uses and moorings. On this basis Policy CR10 does not meet the following tests of soundness:</p> <ul style="list-style-type: none"> • positively prepared; • justified; • Effective; and • consistent with national policy. <p>We would therefore request that Policy CR10 be amended to enable tall buildings within the East Side Opportunity Area in accordance with the recommendations of the Council's TBS.</p>	<p>considered in more detail in the Tall Buildings Strategy Update Note.</p>
<p>Aviva Life and Pensions UK Ltd</p>	<p>Policy CR11</p>	<p>CR11 – Aviva broadly welcomes Policy CR11. As a major landowner in the Opportunity Area (CR11b) and (CR11e) Aviva has been very supportive in the past of the Council's Reading Central Area Action Plan and the subsequent Reading Station Area Framework. Aviva see this as an appropriate (flexible) 'blue print' for the future of this part of Reading that takes advantage of its location benefits, Aviva operates a successful retail park and the lease structures mean that comprehensive redevelopment is more likely to be towards the middle of the plan</p>	<p>Noted. No change needed.</p>

		<p>period. We consider that the development of the wider station area allows the significant improvement of north-south links through the centre and offers the opportunity to expand the core of the centre northwards to help meet development needs of Reading. As such, Aviva supports the Council's view that for the development needs of Reading. As such, Aviva supports the Council's view that for the development of these areas to be successful then developments must benefit from improve accessibility by public transport, and improved permeability for pedestrians and cyclists, particularly in a north-south direction to help change the perception of the area north of the station as a separate entity. We support the acknowledgment that the area can "Contribute towards providing a high-density mix of uses to create a destination in itself and capitalise on its role as one of the most accessible locations in the south east. Development for education will be an acceptable part of the mix." We welcome the acknowledgement that the indicative development capacity are to provide an indication only and that this density can increase and will not preclude higher densities being brought forward if they create high-quality well designed schemes (paragraph 5.4.6) and also that the area around the station is considered "appropriate for well-designed tall buildings, in line with the policy on tall buildings (CR10) and the area will be developed at a higher density even where there are no tall buildings" (paragraph 5.4.8). We welcome the balanced approach to flood risk and the acknowledgement that whilst part of the allocation lies within Flood Zone 2 and 3a but that this consideration must be weighed against the vital role that these sites can play in the regeneration in the centre area of Reading. With the above in mind, Aviva's starting point is to be supportive in principle of the proposals shown in Figure 5.3. As noted in earlier representations, it is important for the ultimate completion of regeneration across the Major Opportunity Area that as sites are likely to be brought forward at different timescales and by different site owners and be subject to piecemeal planning applications and that such individual applications should not prejudice the ability of adjoining owners to bring forward</p>	
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		<p>schemes in a coordinated and controlled way. Aviva considers it important that such development of these area does not cause one land owner to bear a disproportional amount of open space than other developers, or by the land use and placement of buildings on the edge of land plots result in a full stand-off being required to be absorbed by a land owner yet to bring forward its own proposals. Aviva welcomes the inclusion of policy CR11 viii which seeks to avoid such an inequitable approach and states that application should “viii) demonstrate that it is part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling the aspirations of this policy, and which contributes towards the provision of policy requirements that benefits the whole area, such as open space.” To omit such policy wording would be inequitable to landowners, as it would mean the first developer would achieve a minimal mitigation package or provision of public realm, whilst subsequent developers would be liable for greater mitigation.</p>	
<p>Greyfriars Church</p>	<p>Policy CR11</p>	<p>We do not find this policy to be legally compliant or fulfil the duty to co-operate. Policy CR11 is to be supported as a positive tool to secure improvements to specific areas within the town centre. Greyfriars Church is a particularly important historic landmark in a part of the town centre that is characterised by its modern, bustling atmosphere at the western end of one of the town’s main retail areas. It provides a physical and visual ‘end’ to Friar Street before the A329 junction abruptly appears ahead. However, despite the historical and cultural significance of the church, the land immediately surround the church does not contribute to that significance, partly due to the age and state of repair of the buildings and parking area within the church’s curtilage, but also because of the poor quality public realm to the west of the church parking area. Policy CR11 provides an excellent opportunity to designate the church and the land around it (including the public realm land between the A329 and the church) as an area for modernisation and public realm enhancements. However, as drafted, Policy CR11 is considered to be unsound in that it fails to provide the opportunity to</p>	<p>No change proposed. There may be scope for some improvements and enhanced public realm around Greyfriars Church. However, to incorporate the church, which is Grade I listed and one of Reading’s most significant medieval buildings, into policy CR11 which seeks very high density redevelopment would send completely the wrong message. Development on this site is highly unlikely to make any significant contribution to meeting development needs, given the significance of the church. Proposals for the church area will need to be considered on their merits in view of the constraints of the site.</p>

		<p>improve the site including and adjacent to Greyfriars church, and it is therefore not only not positively prepared, but it is not the most appropriate strategy and therefore is not justified. Amend Policy C11 by inserting a final paragraph (CR11j) to read as follows: “CR11j: Greyfriars church and environs – This area of the town centre presents an opportunity to deliver public realm improvements as well as the redevelopment of the Greyfriars church precinct which contains several structures that do not contribute to the significance of this highly valued Grade I listed church (including the church centre, portacabin structure and the 1970s west end extension). Development proposals should have regard to the desirability of sustaining and enhancing the significance of the church, as well as the wider social, cultural, economic and environmental benefits that conservation of this historic park of Reading can bring.” The proposals map should also be altered to depict the boundary of this additional area.</p>	
Historic England	Policy CR11	<p>Policy CR11 - Historic England welcomes and supports criteria vi) and vii) of Policy CR11 Station/River Major Opportunity Area as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.</p>	Noted. No change needed.
K2 Developments	Policy CR11	<p>CR11: Station/River Major Opportunity Area – This policy fails to identify a site specific boundary based on 1.36 ha on the proposals map. This needs to be clarified. We do not support the specific allocation of ‘150-270 dwellings, no significant net gain in offices or retail and leisure.’ This directly contradicts policies RL2 (which states a need for up to 34,900 sq. m of new retail, leisure and cultural space in this most accessible location) and CR4 (which envisages that the Central Core will be the prime focus for leisure and tourism development). As such, we urge the Council to remove reference to no net gains in leisure and retail opportunities within sub area CR11a. The allocation fails to recognise that large sites within the sub-area are in desperate need of regeneration, vacant and failing to contribute to the street scene in this highly visible part of Reading. More flexibility in this policy would allow</p>	<p>Partially agreed. Change proposed. This was not intended to restrict the development potential of the site, rather to provide figures which can be used for monitoring purposes. As the ground floor of this site is already in retail use, it is considered likely that any increase in retail or leisure will not be on a large scale. However, it is agreed that as worded it could be interpreted as overly restrictive. The wording for this site (as well as CR11b, CR11c and CR12d) should be amended to reflect that this is a working assumption rather than a restriction.</p>

		appropriate development to come forward in a viable way and ensure deliverability.	
Unite Students	Policy CR11	<p>CR11: Station River/Major Opportunity Area - Draft Local Plan Policy CR11 specifies the characteristics of development in the Station/River Major Opportunity Area. We recommend the following amendments to the supporting text of Draft Policy CR11.</p> <ul style="list-style-type: none"> The text should include, “given the positive contribution of student accommodation to housing need, any references on the site specific allocations to residential can also be interchanged with student accommodation.” 	No change proposed. These sites are required to meet Reading’s substantial need for general housing, not student accommodation, for which a specific need is not as clearly demonstrable.
Historic England	Policy CR11a	Policy CR11a - Historic England welcomes the commitment to conserving listed buildings and their setting of listed buildings in the area as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy CR11b	Policy CR11b - The Greyfriars Corner site is within the setting of the grade I listed Greyfriars Church and the grade II listed quadrant walls and railings to Greyfriars Vicarage. We would therefore welcome a specific commitment to the conservation of the setting of these listed structures, particularly given the high significance of the church, within Policy CR11b, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	No change proposed. It is considered that this is adequately covered by the general reference to listed buildings in CR11 vi and Figure 5.2
Historic England	Policy CR11c	Policy CR11c - The Station Hill and Friars Walk site is within the setting of the grade II main station building. We would therefore welcome a specific commitment to the conservation of the setting of this building within Policy CR11c, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	No change proposed. It is considered that this is adequately covered by the general reference to listed buildings in CR11 vi and Figure 5.2

Stanhope Plc	Policy CR11c	<p>Stanhope Plc supports the Council’s aspirations for the Station/River Major Opportunity Area.</p> <p>We welcome the suggested increase in the number of dwellings identified for the site, noting that its upper range goes beyond that of the extant consented position. However, the proposed dwelling numbers should not be regarded as a cap, and the policy text should reflect the fact that high density development is appropriate in the town centre, and that sustainably located sites such as Station Hill should optimise the quantum of housing delivery, with due regard to all other relevant planning policies, without an artificial constraint on density or overall housing numbers, in order to ensure that the Borough meets or exceeds its housing targets in the most sustainable locations.</p> <p>Furthermore, the policy does not recognise the retail and leisure floorspace already approved under the extant Station Hill consent (up to 13,500sqm retail and up to 2,000sqm leisure floorspace). It is unclear why specific mention has been made to single level north-south links. It would be clearer if the policy, instead, refers to providing ground floor links.</p>	<p>Partially agreed. Change proposed. Reference to north south links at a single level do not fully reflect the existing permission and should be removed. In terms of dwelling numbers, it is made clear throughout the plan that this represents indicative potential and is not to be applied as a cap. In terms of retail floorspace, the current permission actually results in a net loss, and the policy is therefore reflective of the current permission.</p>
Historic England	Policy CR11d	<p>Policy CR11d - Historic England welcomes the requirement in Policy CR11d Brunel Arcade and Apex Plaza that development should seek to enhance the setting of nearby heritage assets and carefully consider views from within the Conservation Area and Forbury Gardens, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.</p>	<p>Noted. No change needed.</p>
Environment Agency	Policy CR11g	<p>CR11g: In the first sentence, insert ‘the top of the bank of’ before ‘the river’ and at the end of this sentence, add ‘to create an undeveloped ecological buffer with enhanced ecological value.’</p>	<p>Partially agreed. Change proposed. The reference to the top of the bank of the river should be added. However, reference to an ecological zone fail to recognise that this is a site with existing public access directly along the riverbank, including the southern end of a pedestrian and cycle bridge, and this is not achievable.</p>

<p>Environment Agency</p>	<p>Policy CR11g (and SFRA Level 2)</p>	<p>SFRA Level 2, Site AB005 Riverside - The level 2 SFRA classifies this site as Flood Zone 2. According to our flood map for planning, the site boundary is partly within the Flood Zone 3 flood extent. The level 2 SFRA assessment says that the site lies above Flood Zone 3a and is therefore Flood Zone 2. We can't see any evidence that this is the case. It could be due to the fact that the spatial grid cells in this model are quite large, but if we are consulted on this site as a planning application, we would expect to see this demonstrated by a topographical survey showing that all areas within the site boundary lie above the 1 in 100 year flood level (Flood Zone 3). If it is found that the site lies within Flood Zone 3, although residential dwellings on this site will still be appropriate in accordance with table 3 of the NPPF, it will have consequences on what the appropriate climate change allowance should be for this site. If a topographical survey does not demonstrate that the site boundary lies above the 1 in 100 year flood level, then the flood mitigation measures for the development will need to be designed to the 1 in 100 plus climate change allowance of 35% and not 25% as stated In the level 2 SFRA. Residual risk to the development should be investigated against the 1 in 100 annual probability +70% allowance for climate change flood event and not the +35%. Therefore the evidence for the local plan is unsound as it is not justified or effective. We recommend that the level 2 SFRA and sequential test are updated to include the evidence as to why this site is considered FZ2 and not FZ3. If this is not possible, the we recommend that the documents are updated to reflect the possibility that the site may lie in FZ3 and therefore, any flood risk mitigation will need to be designed to the 1 in 100 plus climate change allowance of 35% with further resilience measures designed to 1 in 100 plus climate change allowance of 70%. We recommend that the council consider the effect that providing flood risk mitigation measures up to the 1 in 100 plus climate change allowance of 35% could have on the proposal and be confident that they can allocate 250 - 370 dwellings and 1,000 and 2,000m2 of leisure on this site and still provide the necessary floodplain compensation. If the floor levels have to be raised higher, there may be</p>	<p>No change proposed. As shown in the Sequential Test, the site is almost entirely Flood Zone 2 and 1. As the northern boundary adjoins the river, Flood Zone 3 hugs the boundary of the site and overlaps by a very small margin in places. Since this only affects the existing footpath along the Thames, there is no prospect of development being within Flood Zone 3, particularly with the need for a 10m buffer as specified in policy CR11g.</p>
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		<p>other planning constraints that conflict with this? Consideration should be given to the possibility that a 1 in 100 flood plus climate change allowance of 70%, could result in a sudden increase and speed of flooding to the site if the high wall to the North of the site could be overtopped by flood water. Therefore the residual risk could have a significant effect on any development. If this is the case, it may be that consideration is given to designing the flood risk mitigation measures to the climate change allowance of 70% and not just the 35%. A route of safe access and egress will need to be provided to an area of land wholly outside the 1 in 100 plus an allowance for climate change flood level of +35%. As this assessment is being left until the planning application stage, the council should also be sure that the emergency planning team would be willing to except an evacuation plan if it becomes apparent that a safe access and egress route is not achievable. The policy for this site should be updated to include that Development should take account of mitigation required as a result of a Flood Risk Assessment, as with the other sites that are situated in the flood zones. We understand that this site is to serve as a gateway connecting Caversham and the pedestrian bridge to the train station. The site is currently on a raised plinth. We presume that the ground level will remain the same and that the ground will not be lowered, which in turn would increase the flood risk on this site and also increase the risk of this site being deliverable.</p>	
SSE Ltd	CR11g	<p>We do not believe that the Local Plan is legally compliant or sound.</p> <p>CR11g: Riverside - The site comprises a rectangular shaped land parcel approximately 1.24 hectares in area. It lies in the Central Reading area and is located to the north of Reading Train Station and the town centre. It is bound by the River Kennet to the north, Norman Place office development to the east, Vastern Road to the residential properties on Lynmouth Road to the west.</p> <p>The site comprises office accommodation fronting Vastern Road, with operational electrical equipment located centrally. Vehicular access is available from Vastern Road and Lynmouth Road.</p> <p>The site is in Flood Zone 2 (Medium Probability of Flooding) and as such</p>	<p>Partially agreed. Change proposed. In terms of the leisure and office uses, the policy seeks to emphasise the opportunity for these uses rather than it being an absolute requirement, and a change can clarify this. Whilst offices may be complementary, there is scope for leisure use that has significance beyond the site itself given its Thameside location. In terms of the set-back, the Environment Agency has strongly recommended this, and it is incorporated within policy EN11 on waterspaces due to the</p>

		<p>the Council has undertaken a sequential and exceptions test in accordance with the NPPF. SSE welcomes the inclusion of a draft site allocation under sub-area Policy CR11g: Riverside for residential development, with an indicative density range of 201-298 dph (250-370 units). However, we have a number concerns about the specific requirements of the policy and the potential negative impact these may have on the deliverability of the policy and therefore the Council's ability to implement its Local Plan vision for the Station/River Major Opportunity Area. Draft Policy CR11g requires a set back from the river of at least 10m, which is not a requirement of the adopted site allocation. No justification for this requirement has been provided in the supporting text or the Council's evidence base. In fact it conflicts with draft Policy EN11: Waterspaces and CR3: Public Realm in Central Reading, which requires development adjacent to the river to enhance the relationship of buildings to the watercourse and to engage with the waterfront location with active frontages and engaging elevations. The Council's Statement of Consultation on the FDLP suggests that the 10m requirement is a response to the immediate context, where the Council claims is characterised by existing development set back by 8-9m. In our view this approach prejudices what proposals could come forward on this site, as well as what is and is not an acceptable relationship with the waterfront. This view has been taken by the Council in the absence of any evidence that assesses the particular visual and landscape qualities of the river and its sensitivity to development. In our view, imposition of a 10m setback in the allocation with no evidence to support the approach is both unacceptably restrictive and goes beyond the remit of a Local Plan, which should be dealing only with principles. This requirement places an unnecessary development constraint on the site which potentially puts at risk other Council objectives to deliver as many homes as possible over the Plan period and to create a north/south connection between the river and town centre. This runs contrary to paragraphs 17, 47 and 58 of the NPPF in failing to make efficient use of land by optimising the development potential of site to boost housing</p>	<p>importance of the river's biodiversity role. The towpath is 5m wide, and buildings along the south bank of the Thames are generally at least 8m back from the river in any case. In terms of open space, this location at the meeting point of the Thames towpath and the north-south link through the centre is a logical location for an area of open space, as identified in the Reading Station Area Framework. There is no minimum size specified, and it may be that a small, high-quality space is appropriate.</p>
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		<p>delivery. Policy CR11g states that any development should continue the north/south pedestrian and cycle link from the station, with “potential for an area of open space at the riverside”. SSE would endorse the objectives of the north/south route and the associated green link, but object to the requirement for an area of open space at the riverside, which in their view would place a further development constraint upon the site, putting at risk the other objectives of the Local Plan and draft Policy CR11.</p> <p>It is acknowledged that the wording only indicates that the open space may be provided, however, Figure 5.3 Station/River Major Opportunity Area Strategy identifies a ‘new area of open space’. On this basis, SSE are concerned that this will establish the requirement for an area of formal open space adjacent to the river. Paragraph 73 of the NPPF states that: “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 Council has not provided any evidence to support the requirement for formal open space on the site, which is contrary to the NPPF. On this basis, any open space requirement should be determined as part of a planning application in accordance with draft Policy EN9. Notwithstanding this, from a review of the Local Plan, and having regard for both existing and planned public open spaces close to the site (i.e. Christchurch Meadows to the north and the new civic spaces to the north and south of the train station), it is clear that the Council has not considered how these open spaces would be complimented by a new space on the site and how this would provide diversity across Reading’s open space network. It is our view that the green link requirement of Policy CR11g, presents an opportunity to provide variety in the network and would be of far greater value than a formal open space on the site. Policy CR11g states that the main use of the site should be residential, but adds that “some small scale offices and leisure will also be appropriate”. The indicative site capacity indicates 1,000-2,000 sqm of leisure and no net increase of office floorspace. The evidence base does not support the provision of</p>	
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		<p>non-residential uses on the site. In fact the spatial strategy for Central Reading states at paragraph 3.2.4 that the Local Plan will provide for up to 27,000 sqm of town centre uses, which is a significant reduction from the 40,000 sqm stated in the FDLP (paragraph 3.2.4). On this basis, there is no evidence to support an approach that would reduce the number of homes delivered on a central Reading site, contrary to paragraph 47 of the NPPF. SSE welcomes the recognition of the north/south pedestrian and cycle link as a Council priority at paragraph 5.4.6 and how this will be a given substantial weigh for decision taking purposes. However, Policy CR11g should also recognise the strategic significance of this movement corridor and require the scale of development to be informed by this important status. On the basis of the above, SSE request that Policy CR11g be amended to ensure that the policy is deliverable and to enable the Council to realise its objectives:</p> <p><u>“Development should maintain and enhance public access along and to the Thames, and should be set back at least ten metres from form an appropriate visual and physical relationship with the river. Development should continue the high quality route including a green link from the north of the station to the Christchurch Bridge, and its form and scale should respond to the strategic importance of this new connection with potential for an area of open space at the riverside.</u> The main use of the site should be residential, although some <u>complementary</u> small-scale offices and leisure <u>will also be acceptable appropriate.</u></p>	
Environment Agency	Policy CR11i (and SFRA Level 2)	SFRA Level 2, Site AB099 Network Rail Land, Napier Rd - According to our flood map for planning, the boundary for this site is in FZ3 and not FZ2 as stated in the level 2 SFRA. Unless a topographical survey demonstrates that this site lies above the 1 in 100 year flood level. If a topographical survey does not demonstrate that the site boundary lies above the 1 in 100 year flood level, then the flood mitigation measures for the development will need to be designed to the 1 in 100 plus climate change allowance of 35% and not 25% as stated In the level 2 SFRA. Residual risk to the development should be investigated against the 1 in 100 annual probability +70% allowance for climate change flood	No change proposed. As set out in the Sequential Test, whilst the site itself sits within a range of Flood Zones, including 3, only a portion of the site falls within the allocation. This is the western part of the site and is within Flood Zone 2.

		<p>event and not the +35%. We recommend that the level 2 SFRA and sequential test are updated to include the evidence as to why this site is considered FZ2 and not FZ3. If this is not possible, the we recommend that the documents are updated to reflect the possibility that the site may lie in FZ3 and therefore, any flood risk mitigation will need to be designed to the 1 in 100 plus climate change allowance of 35% with further resilience measures designed to 1 in 100 plus climate change allowance of 70%. All development will take place on the Western edge of the site but it is not clear how much. The development allocation is for 210-310 dwellings but this allocation will be shared alongside site AB007 (Napier Court). Therefore the evidence for the local plan is unsound as it is not justified or effective. We recommend that the council consider the effect that providing flood risk mitigation measures up to the 1 in 100 plus climate change allowance of 35% could have on the proposal and be confident that they can allocate the level of required dwellings on this site and still provide the necessary floodplain compensation. A route of safe access and egress will need to be provided to an area of land wholly outside the 1 in 100 plus an allowance for climate change flood level of +35%. As this assessment is being left until the planning application stage, the council should also be sure that the emergency planning team would be willing to except an evacuation plan if it becomes apparent that a safe access and egress route is not achievable. We advise that the emergency planning team are consulted prior to these sites being out forward in the local plan. If a safe access and egress route cannot be achieved to an area outside of the 1 in 100 year flood plus an appropriate allowance for climate change extent, then it should be confirmed that an evacuation plan would be acceptable.</p>	
Historic England	Paragraph 5.4.8	<p>Paragraph 5.4.8 - Historic England welcomes the recognition in paragraph 5.4.8 of the number of significant buildings in the area and the conservation area and historic Forbury Gardens nearby, and the requirement for development to respect the setting of these assets and avoid detriment to them, as part of the positive strategy for the</p>	Noted. No change needed.

		conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	
Historic England	Paragraph 5.4.11	Paragraph 5.4.11 - Historic England welcomes the recognition of the high archaeological potential of this area and the requirement for early consultation in paragraph 5.4.11 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy CR12	Policy CR12 - Historic England welcomes, in principle, criteria v) and vi) of Policy CR12 West Side Major Opportunity Area: the commitment to the protection of the setting of listed buildings in the area as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework. We would also like to see “which should inform the development” added to the end of criterion vi) and the commitment to include the protection of the listed buildings themselves as well.	No change proposed. This reference appears to already be covered in criterion vi.
Unite Students	Policy CR12	CR12: West Side Major Opportunity Area - Draft Local Plan Policy CR12 specifies the characteristics of development in the West Side Major Opportunity Area. We recommend the following amendments to the supporting text of Draft Policy CR12. <ul style="list-style-type: none"> The text should include, “given the positive contribution of student accommodation to housing need, any references on the site specific allocations to residential can also be interchanged with student accommodation.” 	No change proposed. These sites are required to meet Reading’s substantial need for general housing, not student accommodation, for which a specific need is not as clearly demonstrable.
Ropemaker Properties	Policy CR12b	CR12: West Side Major Opportunity Area – We consider this policy to be legally compliant and that it fulfils the duty to co-operate, but is unsound. We welcome the continued inclusion of site CR12b Great Knolly Street and Weldale Street within the Local Plan. As you will be aware, there is currently a resolution to grant planning permission on approximately half of this allocation for 429 dwellings. As has been set out in previous representations, there is clearly the potential for	Noted. No change proposed. The development referred to (where permission has now been granted) falls within the range specified, albeit at the top. Whilst this part of the site may only be half of the area geographically, it represents the vast majority of the land which is expected to come forward in the plan period. The remainder

		<p>significantly more dwellings than the indicative potential within the policy. In the first instance, Reading should be seeking to meet its own OAN, and should therefore be ambitious about the development of potential sites, particularly those in close proximity to the town centre and Reading’s high quality transport links. The HELAA has identified that recent developments within the town centre, have been achieving higher densities than those set out in the plan and the given the general thrust of government policy within the White Paper, the Plan should seek to increase densities wherever possible particularly on city centre brownfield sites close to transport links. In order to make this policy sound, the density for site CR12b (Great Knolly Street and Weldale St) should be increased to reflect the resolution to grant permission on half of the site for 429 dwellings, and also the evidence within the HELAA which suggests at 3.5 that recent new-build developments within the town centre have been achieving 3254 dph and on the fringe, 200dph. Clearly, this is subject to constraints, but the Plan should be ambitious in the numbers that can be achieved on sites.</p>	<p>(barring developments under construction) largely constitutes small business units between Great Knollys Street and Weldale Street. In calculating the development potential of the site, the HELAA recognises the need for replacement of such uses, and does not consider that redevelopment of these units for residential is likely to occur within the plan period, and therefore excludes them from the figures that have then fed into the allocation. It is therefore worth noting that, even if the specified dwelling range were to increase, this would not necessarily feed into a change to the overall expected delivery.</p>
Historic England	Policy CR12c	<p>Policy CR12c - Historic England welcomes the recognition of the heritage assets around this area and the statement that inappropriate building scale at the fringes of the site will not be permitted, in Policy CR12c Chatham Street, Eaton Place as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.</p>	<p>Noted. No change needed.</p>
Moorgarth Group Limited	Policy CR12d	<p>CR12: West Side Major Opportunity Area – Moorgarth generally supports the Council’s aspirations for the West Side Major Opportunity Area. In particular, Moorgarth supports the policy direction toward a mix of uses including residential in this location. Moorgarth generally supports Policy CR12d, Broad Street Mall, however, the indicative development potential for both residential and retail/leisure uses should not be regarded as an upper limit. The policy text should acknowledge that high density development is appropriate in the town centre, and that sustainably located sites such as Broad Street Mall</p>	<p>Partly agreed. Change proposed. The policy text for CA12d will be amended in line with other representations to clarify that the reference to there being no significant net gain in retail and leisure is a monitoring assumption not a policy stance. In terms of residential, the Local Plan is clear in a variety of places, particularly 5.4.15, that the dwelling ranges specified are indications and not policy caps, and that more detailed</p>

		should optimise the quantum of housing delivery, with due regard to all other relevant planning policies, without any artificial policy cap on density or overall housing numbers. This will assist the Borough to meet or exceed its housing targets in the most sustainable locations.	design work may be able to justify a greater number of dwellings. The Plan is clear that high density residential in the town centre is generally appropriate, and this has informed the whole strategy.
Historic England	Policy CR12e	Policy CR12e - The Hosier Street sub-area abuts, or possibly includes, part of the St Mary's Butts and Castle Street Conservation Area and a number of listed buildings. We would therefore welcome a requirement in Policy CR12e for the conservation and enhancement of the conservation area and these listed buildings, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	No change proposed. It is considered that this is adequately covered by the general reference to listed buildings in CR12 v.
Theatres Trust	Policy CR12e	West Side Major Opportunity Area – Site CR12 (Hosier Street): Paragraph 5.4.17 asserts that for some time there has been a need to replace the Hexagon in that the theatre is not suited to modern theatre requirements and is expensive to maintain. The Trust doesn't agree that the Hexagon is in need of replacement, nevertheless we welcome that any development of the theatre will only be acceptable if a replacement facility is provided and "approaches to the theatre will be improved". To ensure the future provision and sustainability of theatre and live performance in Reading and support its role as a centre for arts and culture as articulated in the Plan's Vision, the Trust requests that Paragraph 5.4.17 reinforces the requirements for re-provision as outlined in Policy RL6. It is also suggested that additional detail is included requiring applicants and the Council to work with the Theatres Trust and/or recognised theatre operators/architects to ensure any replacement venue is appropriately designed so as to be functional and meet the needs of audiences and performers.	Agreed. Change proposed. The supporting text should be amended to reflect the policy, and to include reference to the Theatres Trust, who are a statutory consultee.
Historic England	Paragraph 5.4.15	Paragraph 5.4.16 - Historic England welcomes the recognition in paragraph 5.4.15 of the Russell Street/Castle Hill and St Mary's Butts/Castle Street conservation areas and numerous listed buildings adjoining the West Side as a potential opportunity rather than a	Noted. No change needed.

		constraint, with the chance to significantly improve parts of the area to better relate to the conservation area, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	
Historic England	Paragraph 5.4.19	Paragraph 5.4.19 - Historic England welcomes the recognition of the high archaeological potential of this area and the requirement for early consultation in paragraph 5.4.18 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Aviva Life and Pensions UK Ltd	Policy CR13	Aviva welcomes Policy CR13, and as a major landowner in this Opportunity Area (CR13b/c), Aviva has been very supportive in the past of the Council's Reading Central Area Action Plan (AAP). The principle Aviva wish (as with the earlier allocation) is to raise the need for fairness and equality in seeking the development of the allocations. Landowners are reliant on the LPA ensuring that each development being brought forward within the allocation will be responsible for its fair share of mitigation and provision of public realm, whilst not prejudicing the appropriate development potential of individual sites through individual scheme designs. As with their comments on Policy CR11 Aviva welcomes the inclusion of CR13 vii which seeks to avoid such an inequitable approach and states that applications should "(viii) Demonstrate that it is part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling the aspirations of this policy, and which contributes towards the provision of policy requirements that benefit the whole area, such as open space". To omit such policy wording would be inequitable to landowners, as it would mean the first developer would achieve a minimal mitigation package or provision of public realm, whilst subsequent developers would be liable for greater mitigation.	Noted. No change needed.
Historic England	Policy CR13	Policy CR13 - Historic England welcomes, criteria v) and vi) of Policy	Noted. No change needed.

		CR13 East Side Major Opportunity Area, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	
Unite Students	Policy CR13	<p>CR13: East Side Major Opportunity Area - Draft Local Plan Policy CR13: specifies the characteristics of development in the East Side Major Opportunity Area. We recommend the following amendments to the supporting text of Draft Policy CR13.</p> <ul style="list-style-type: none"> The text should include, “given the positive contribution of student accommodation to housing need, any references on the site specific allocations to residential can also be interchanged with student accommodation.” 	No change proposed. These sites are required to meet Reading’s substantial need for general housing, not student accommodation, for which a specific need is not as clearly demonstrable.
Historic England	Policy CR13a	<p>Policy CR13a - Historic England supports the sensitive re-use of the historic prison building, which is grade II listed and a scheduled monument. However, we consider that this is least likely to be achieved through a conversion to residential, and therefore would like to see residential considered only as a last resort, only if it can be clearly demonstrated that other uses are not practicable. We would therefore like the policy to be amended to make this clear. We also suggest omitting the reference to the indicative potential for the number of dwellings as our experience shows that the higher number becomes the target, rather than the acceptable number of dwellings being based properly on a rigorous assessment of the number of dwellings the building can acceptably accommodate. Without these amendments we consider that Policy CR13a fails to provide adequate protection for this heritage asset of the highest significance in accordance with paragraphs 132-134 of the National Planning Policy Framework and therefore that the Plan is not sound in this respect.</p> <p>These comments are without prejudice to any comments we may wish to make on any proposals for re-use. Amend Policy CR13a to clarify that the conversion of the former prison to residential should be considered only as a last resort and only if it can be clearly demonstrated that other</p>	No change proposed. The Council considers it necessary to keep all options about the re-use of the prison open at this stage. The importance of securing a beneficial use of the building means that it would be inappropriate to rule out potential uses. Proposals will need to be considered against the significant heritage importance of the site and building. Dwelling numbers are mainly included as targets for monitoring, and the text makes clear that more detailed assessment may lead to a different conclusion.

		uses are not practicable e.g.: “The building would be used for commercial offices or a hotel, or, as a last resort, only if it can be clearly demonstrated that these uses are not practicable, residential or student accommodation, and could include some cultural or heritage element or related retail and leisure that draws on its significance.” Omit the reference to the indicative potential for the number of dwellings.	
Studios Construction (Reading) Ltd	Policy CR13a	CR13a: Reading Prison - In contrast to the aforementioned policies, we note policy CR13a Reading Prison, states: “The building would be used for residential or student accommodation...” This does not seem to be consistent with the emerging policies of plan, as the prison is not on or adjacent to an existing further or higher education campus. Whilst our client does not seek to object to draft policy CR13a in its entirety, Studios do wish to communicate the need for the Local Plan to be consistent, particularly within its own policies, in order to be found sound. This highlights the inconsistencies within the Council’s approach, as it is assessed as a sustainable location, however one which does not conform to draft policy H12.	No change needed. There are very specific circumstances relating to Reading Prison, in that it is a very substantial vacant listed building that requires a beneficial use that minimises its impacts on the integrity of the building. The internal layout of the building, may be more suited to being adapted to the smaller units of student accommodation than general residential, and it is important in this exceptional case that uses that could secure a beneficial future for the site are not restricted. These are unique circumstances.
Environment Agency	Policy CR13b	CR13b: We are pleased to see reference to buffer zones along the River Kennet in CR13b, Forbury Retail Park and CR13d, Gas Holder. These should be amended to state that the buffer zones should be a minimum of 10 metres in width measured from the top of the river bank, that they should be free from development and the ecological value enhanced.	Partly agreed. Change proposed. The reference to the top of the bank of the river should be added. However, reference to an ecological zone fail to recognise that this is a site with existing public access directly along the riverbank, and this is not achievable.
Environment Agency	Policy CR13c	CR13c: To be consistent with 13b and 13d, it should also include a buffer zone that is a minimum of 10 m in width measured from the top of the river bank, which should be free from development and the ecological value enhanced.	No change proposed. The areas immediately adjacent to the river are covered by listed buildings and will not be developed in any case. Open space would be close to the river, but not directly adjacent.
RBS Pension Trustee, Ltd	Policy CR13b	Site Specific Allocations – The extent of our client’s ownership is detailed on the Site Location Plan enclosed with this correspondence. Phase 2 of the Forbury Retail Park comprises seven large format retail warehouse units providing approximately 9,100 sq m of floorspace at ground floor	Noted. No change proposed. The current situation with regard to likelihood of development is noted, and it is understood that,

		<p>level. In addition, a new drive through KFC restaurant was recently constructed and it not open to the public. Site Allocation CR13b 'Forbury Retail Park' includes our client's site in addition to other retail warehousing to the east and south. Reading Local Plan – Pre-Submission Draft proposes the following allocation: <i>The site would be the focus of a new residential community, and, alongside residential, additional retail, leisure and community uses at a scale to serve the Kenavon Drive area would be appropriate. It should include a new area of open space and enhance the frontage to the canal, including a buffer zone to the canal bank to reflect its wildlife significance. Implementing this policy may involve complete redevelopment or using new additional development to improve the existing urban form of the area. Some parts of the site are likely to be implemented in the long term. Site size: 6.99 ha Indicative potential: 1,230-1,840 dwellings, no net gain of retail.</i></p> <p>Proposed Local Plan Amendment – Following the publication of the Local Plan Issues and Options stage document (January 2016) and the inclusion of the Site within the Reading Housing and Economic Land Availability Assessment, our client investigated residential led redevelopment of the Site. Given the high existing value of the established commercial floorspace, it is not economically viable to redevelop the Site for residential land uses in the short to medium term. Furthermore, given the uncertainty linked to longer term forecasts of development costs and values, it is impossible to predict whether a residential led redevelopment of the Site will become viable in the longer term. In light of this, there can be no certainty that the site will be available to contribute towards local housing supply over the emerging Local Plan period. Whilst the owner does not object to the proposed identification of the Site is one that offers potential for residential land uses in the future, it is critical that such an allocation does not impact on the established commercial function of the Site. In order for the emerging Plan to be deemed sound, it must be based on robust and credible evidence and effective. Given the commercial</p>	<p>implementation is considered to not be particularly likely within the plan period, or, if so, only in the long term. The November 2017 version of the HELAA takes account of this and does not assume delivery in the plan period. However, an allocation is justified given the aims of addressing underused sites on the edge of the centre.</p> <p>It is not agreed that the site needs to be a separate allocation, as many of the MOA sub-areas are in more than one ownership and may come forward separately.</p> <p>It is not considered that the allocation prejudices the ability to meet the operational requirements of the existing retail park. The existing RCAAP policy has been in place since 2009, but has not prevented applications being permitted for mezzanine floors, external alterations and a new pod unit. It is important that the long-term aspirations for the site are emphasised.</p>
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		<p>considerations set out above, there is an obvious risk that the Site will not be delivered which could lead to a shortfall in supply. The allocations that are progressed should be realistic in terms of phasing and overall deliverability. To properly reflect the position above, we would request that the Site is separated from the adjoining retail warehouses to create a new, distinct allocation. The new allocation should acknowledge the Site's established commercial function and the contribution it makes to meeting the commercial requirements of residents within the Reading Central Area and wider Borough. As set out above, the owner of the Site does not object to the Site being identified as one that has potential for housing. It follows that the allocation can support such a land use but this would not preclude any future commercial development linked to the established role and function of the Site. It is critical that any allocation does not prejudice the owner's ability to meet the operational requirements of existing or new operators as formats and consumer needs evolve and develop. Such requirements may include: the reconfiguration of and/or extension to existing floorspace; changes of use to other commercial classes or variations of conditions relating to opening hours or servicing. Below we set out our proposed revised wording for a new site specific allocation: <i>Forbury Retail Park Phase 2 – Revised Allocation – Forbury Retail Park Phase 2 is located in the Central Area and makes a positive contribution to meeting the retail and commercial needs of the local population. Given its location, it is suitable for a range of main town centre uses such as retail and leisure as defined by the NPPF. The site is also considered acceptable for residential land uses including private rented homes.</i> Should the Local Planning Authority consider a separate allocation is inappropriate, we would request that specific reference is made to the Site in the existing allocation.</p>	
Viridis Real Estate Services Ltd	Policy CR13c	<p>Site - The Kenavon Drive site is located to the east of Reading town centre and is approximately 2.1 hectares in area (see attached location plan). The site is bound to the north by the Reading to Paddington mainline, to the east by the Bellway Homes site (formally 42 Kenavon</p>	<p>No change proposed. As is noted, the dwelling figures are an indication, and it may be possible to accommodate more (or less) depending on detailed design. In overall terms, the density is</p>

		<p>Drive), to the south by Kenavon Drive, and by Forbury Retail Park to the west. The Toys R Us and Homebase development site on the south side of Kenavon Drive has a resolution from the Council to grant planning permission for a high density residential led mixed use scheme subject to there being no Direction to the contrary from the Secretary of State and completion of a Section 106 Agreement. The wider area comprises a range of land uses, including: retail to the southwest and west; and residential to the east and southeast. Building heights also vary from two/three storey houses to the southeast to six/seven/eight storeys to the east and south. The Toys R Us and Homebase proposals include buildings up to 11 storeys in height.</p> <p>Policy CR13: East Side Major Opportunity Area - Viridis welcomes the inclusion of a draft site allocation under sub-area Policy CR13c: <i>Kenavon Drive & Forbury Business Park</i>. However, for reasons already touched upon earlier and in Viridis' FDLP response, the Council's precautionary approach to development density results in Policy CR13c setting an indicative unit number of 130-190 homes on this site. This fundamentally conflicts with the NPPF in relation to optimising the potential of sites and the requirement to significantly boost the supply of homes. The Council's SoC states in response to Viridis' FDLP representations (pages 12 and 13) on Policy CR13c that: <i>"The Council has not sought to design any development on the site, and has used a methodology that is consistent across the Borough. It will be for an applicant to demonstrate that a specific scheme is appropriate."</i> This reinforces the point made earlier in this letter, that the Council has adopted a crude approach to assessing the development potential of sites, underpinned by the flawed pattern book density baseline in the Council's HELAA. The Council's approach treats the allocation site as urban (Figure 2, page 10) and adopting the 'pattern book' method has taken an average of recent developments in the 'urban' area. This results in an average density of 74dph, applied to all sites within the 'urban' area. This effectively means that sites in areas characterised by a</p>	<p>expected to reduce from west to east as the development gets further from the central core, and Policy CR13 talks of medium to high density rather than simply high density.</p> <p>It should be emphasised that the pattern book approach that the Council has sought to apply is 81 dph, not 74, as a 10% uplift in urban densities was applied in the HELAA. Once the range expressed in the policy is applied, the density of the site that would actually be subject to development goes up to 93 dph. This representation notes that the immediately adjoining site at 42 Kenavon Drive was recently developed at 77dph. Whilst the Meridian is adjacent, both the Cooper BMW site and the Homebase/Toys R us site are closer to the central core and station, and Cooper BMW is part of a tall buildings cluster and permitted for a 23 storey building. If an approach of setting a mid-range between the eastern and western extremes were adopted (which is not the Council's approach), then it would be Homebase/Toys R us that would be the appropriate site to consider, not Cooper BMW.</p> <p>The Council has not sought to design any development on the site, and has used a methodology that is consistent across the Borough. Specific sites may be developed for more or for less units, but the approach expects that this will equalise across Reading in terms of overall housing figures. It will be for an</p>
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		<p>very clearly defined domestic scale of development built around lower densities, such as Caversham, Norcot and Redlands, are considered at the same density as the draft allocation at Kenavon Drive. This approach runs contrary to the NPPF, specifically paragraph 59 which explains that density standards should be informed by neighbouring development and the wider local area. If this very sensible method was adopted then from a cursory glance at nearby development, the draft allocation indicative capacity should have regard to the following:</p> <ul style="list-style-type: none"> • Toys R Us site: 273 dph (planning reference 170509/FUL); • Former Cooper BMW site: 642 dph (planning reference 162166/FUL); • The Meridian Kenavon Drive: 209 dph (planning reference 030918); • Land at 42 Kenavon Drive: 77dph (planning reference 131280). <p>The average density of these neighbouring and local developments would be 300dph. In consideration for the particular site constraints, which the Council states in its SoC should see density reduce from west to east, and the two local density extremes at the Former BMW site and 42 Kenavon Drive, we would take the view that a sensible, realistic and achievable density range for allocation CR13c would be 200dph to 250dph, which roughly equates as between 415 and 515 units. On this basis Policy CR13c does not meet the following tests of soundness:</p> <ul style="list-style-type: none"> • positively prepared; • justified; and • consistent with national policy. <p>We would therefore request that Policy CR13c be amended to increase the indicative development potential to reflect the densities achieved on neighbouring development, which has been found by the Council to be acceptable in planning terms.</p>	<p>applicant to demonstrate that a specific scheme is appropriate.</p>
Historic England	Policy CR13c	<p>Policy CR13c - The site at Kenavon Drive and Forbury Business Park is within the setting of a number of grade II buildings south of Gasworks Road. Historic England would therefore welcome a requirement in Policy CR13c for the conservation and enhancement of the setting of these</p>	<p>No change proposed. It is considered that this is adequately covered by the general reference to listed buildings in CR13 v and Figure 5.4.</p>

		listed buildings, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework. The addition of a requirement to Policy CR13c for the conservation and enhancement of the setting of the listed buildings adjacent to the site.	
Environment Agency	Policy CR13d	CR13d: We are pleased to see reference to buffer zones along the River Kennet in CR13b, Forbury Retail Park and CR13d, Gas Holder. These should be amended to state that the buffer zones should be a minimum of 10 metres in width measured from the top of the river bank, that they should be free from development and the ecological value enhanced. We do not believe that access to Kennet Mouth is necessary as there is access on the opposite side and a footbridge very close by.	Partly agreed. Change proposed. The reference to the top of the bank of the river should be added. However, reference to an ecological zone would conflict with the aim of providing public access along the river, which we continue to consider an important element of the proposal to enhance permeability.
SGN and Danescroft	Policy CR13d: Gas Holder	CR13d: Gas Holder – The site is occupied by a single Gas Holder, some ancillary buildings, a water tower and an area of hardstanding. The site is broadly triangular in shape and is bounded by the River Kennet to the south, by the railway to the north, and by the recent development immediately adjoining the western side of the site formerly known as 42 Kenavon Drive. The site was granted planning permission for the erection of 192 dwellings with associated access, parking, landscaping and open space in 2013 under application reference 131280 and is currently nearing completion (now known as Robert Parker Road). The Gas Holder site is currently owned and operated by SGN, however the Gas Holder has been taken out of service and so is no longer in use. The Gas Holder occupies the majority of the site’s area, and the existing buildings and hardstanding currently remain in use as a depot for SGN, where vehicles and materials are stored. The site is fully operation and will remain so unless a viable planning permission for a change of use is achieved. As with many others across the country, the Gas Holder itself had become too expensive to maintain given its age. More modern techniques, such as line packing, are also gradually replacing the storage capacity previously provided by gas holders. Line packing involves storing gas within the existing pipe infrastructure. This has become	Partly agreed. Change proposed. The proposed amendments about provision of public access along the northern bank of the Kennet outside the Gas Holder site represent a reasonable approach and should be taken on board, albeit it is considered that the wording should be slightly different. In terms of the 10 metre buffer, this is based on advice by the Environment Agency, strongly articulated in their response to this Plan. Whilst the proposed amendments suggest a cross-reference to EN11, in practice EN11 says the same thing, so it is not clear how the amended policy would differ in practice. In terms of the dwelling numbers, as we have previously responded, the dwelling figures are an indication, and it may be possible to

		<p>possible as the quality of pipes has been improved over time. The hazardous substances consent for the Gas Holder was revoked at the end of 2012. The previous consultation zones associated with the hazardous substances consent around the Gas Holder have therefore been removed. There is no prospect of the Gas Holder being brought back into use as part of the network in the future or its adaptation for alternative uses. The potential for site contamination is understood to be significant and it is anticipated that extensive remediation works would be necessary before any redevelopment of the site for any use could be carried out. There remains some underground gas infrastructure which can be diverted and stopped up as part of a redevelopment plan for the site. The site is also understood to be close to an existing hazardous pipeline, however this is associated with the previous use of the Gas Holder and there would no longer be a need for the pipeline once the site is redeveloped for an alternative use. Part of the site falls within the Reading Air Quality Management Area (AQMA) due to its proximity to the railway line where it passes through the built-up area. The site also falls within Flood Zone 2. The principle of redevelopment of the site for residential use has been established in adopted planning policy for a number of years. Policy RC3f of the Reading Central AAP relates specifically to the Gas Holder and states that: "This area will be used for residential development. Development should enhance the character of the mouth of the Kennet and should maximise the potential of the site to be a river gateway to Reading." In terms of the surrounding area and rest of the East Side MOA, the development of 42 Kenavon Drive is now nearing completion as highlighted above, having been redeveloped by Bellway Homes for 192 new homes. In recent weeks the Borough's Planning Committee has also resolved to grant full planning permission for 765 flats up to a maximum of 11 storeys on the Toys R Us and Homebase site at Kenavon Drive, following an application made by L&Q last year. The allocation of the CR13d for residential development is strongly supported. The only change from the Regulation 18 version of the plan is the need to take</p>	<p>accommodate more (or less) depending on detailed design. The Council has not sought to design any development on the site, and has used a methodology that is consistent across the Borough. It will be for an applicant to demonstrate that a specific scheme is appropriate. Initial design options have not been submitted to the Local Plan consultation, and it is difficult to judge whether the site can therefore accommodate the level of development suggested. Merely being in a prominent location is not considered to justify such an increase in dwelling capacity without assessing options in more detail, but as has been noted, this can be undertaken through the planning application process.</p>
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		<p>into account of potential contamination on the site, which is supported. To ensure the soundness of the plan however, a number of comments are made below on the policy as currently worded and the indicative site capacity included within the Pre-Submission Draft Local Plan. Some of these points have been taken forwards from our previous representations where we consider there are still valid reasons for amendments to be made to the Plan as currently drafted. Flexibility is welcomed, as in this instance it is considered that the Gas Holder site is capable of accommodating up to 120 dwellings. It is therefore considered that the estimated capacity of 46-70 dwellings in CR13(d) represents a conservative indication of the development potential of the site. As discussed further below, it is also unlikely that a development of the scale indicated in the Pre-Submission Local Plan would be viable. The indicative capacity should therefore be increased in order to support the change of use envisaged by the Council in adopted and emerging policy. In the case of the Gas Holder (HELAA ref: AB016), an estimated development capacity of 58 dwellings was derived using the pattern book approach, rather than a site-specific manual calculation. The Council has then applied a buffer of $\pm 20\%$ to this figure, resulting in the indicative potential of 46-70 dwellings set out in the Draft Local Plan. Whilst no objection is raised to the 'pattern book' approach used in the HELAA in principle, for the reasons set out below it is considered that the Gas Holder is a site for which it would be more appropriate to utilise the site-specific manual calculation method for calculating development capacity. Firstly, the Gas Holder site is located at a prominent location in the east of Reading. Supporting paragraph 5.4.22 recognises that the East Side MOA is "highly visible from the railway line, and it therefore affects the perception of Reading for people who arrive or pass through by rail". Given its location, the Gas Holder site is the first part of the central area that is visible for people arriving from the east by rail, from both the London Waterloo and Paddington railway lines. This is confirmed in the Sustainability Appraisal, which notes that "the [Gas Holder] site is prominent on entry to Reading by train, and a beneficial</p>	
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		<p>development might therefore have positive economic effects". Due to its location next to the River Kennet, the policy itself also recognises the potential of the site to be a "river gateway" to Reading. Based on an initial design feasibility exercise it is envisaged that, through such a design, the site could accommodate between 100 and 120 dwellings. As the Council will be aware however, the costs of redeveloping a site such as this are not insignificant, due primarily to the costs associated with dismantling the gas holder and decontamination of the site itself. This would prohibit a traditional lower density residential scheme from being a viable alternative. Overall, it is therefore considered that the indicative capacity of the Gas Holder site should be increased from 46-70 dwellings to 100-120 dwellings, to reflect the prominent location of the site; its redevelopment potential as a rail and river gateway to Reading; and the need to ensure the site is allocated for a residential use of sufficient value to ensure the site comes forward for redevelopment, as desired in both existing and emerging policy. Whilst the principle of providing public access along the river is supported within the Gas Holder site itself, some areas of land required to provide a continuous pedestrian connection "to the Kennet Mouth" beyond the Gas Holder site to the north-east (as indicated by the dotted purple line on Figure 5.5.) fall in separate ownership to the Gas Holder site itself. Such connections would therefore fall outside the control of the landowner and/or subsequent developer. Continuous public access along the northern side of the River Kennet up to the Kennet Mouth would also require the existing railway to be crossed twice, as the Waterloo and Paddington lines have already started to diverge by this point. The Council consider that this "public access could be created under existing railway bridges using existing openings, so new tunnels and bridges are not required." It is recognised that continuous public access to the Kennet Mouth is an important policy aspiration. However, this should be reflected in the criteria for all new developments in the East Side MOA as a whole at the outset of the policy, rather than as part of the specific policy requirements for the Gas Holder. It is recommended that this instead be</p>	
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		<p>amended to “(ix) Maintain, improve and create new access along the north side of the River Kennet, <u>with a view to providing a continuous pedestrian connection to the Kennet Mouth.</u>” In terms of the requirement that development be set back a minimum of 10 metres from the river, the new clarification as to what is meant by ‘development’ in the supporting text to Policy EN11 ‘Waterspaces’ is welcomed (paragraph 4.2.50 refers). Fundamentally however, given the obvious implications for developable areas, it remains unclear how the proposed set back of 10 metres has been derived. The Council states that “10 metres is not particularly significant in the context of the development site, and it is considered that it should be achieved wherever possible”,³ however no further evidence has been referenced which justifies the 10 metre figure. As such this requirement is unjustified and the policy is therefore unsound as currently drafted. It is considered that a reduced set back would still allow the creation of a wildlife corridor along the river, whilst ensuring a more effective and efficient use of land. This is particularly important on previously developed sites within the urban area such as this, as encouraged by paragraph 17 of the NPPF, particularly given the significant costs associated with redeveloping sites such as this. For all the reasons discussed above, it is therefore considered that the wording of Policy CR13(d) should be amended as follows:</p> <p>CR13d, GAS HOLDER:</p> <p>This area will be used for residential development. Development should enhance the character of the mouth of the Kennet and should maximise the potential of the site to be a river gateway to Reading. Public access along the river to the Kennet Mouth <u>within the site</u> will be sought. Development should be set back at least ten metres from the river <u>in accordance with Policy EN11</u> and allow for a wildlife corridor along the river. Development should take account of potential contamination on the site.</p> <p>Site size: 0.71ha Indicative potential: 46-70 <u>100-120</u> dwellings.</p>	
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Historic England	Paragraphs 5.4.26 and 5.4.29	Paragraphs 5.4.26 and 5.4.29 - Historic England welcomes the recognition of the need to take account of impacts on the setting of historic sites and opportunities for enhancement, and that the prison site offers a particular opportunity to achieve this, and of the archaeological potential of the area in paragraphs 5.4.26 and 5.4.29, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Unite Students	Policy CR14	CR14: Other Sites for Development in Central Reading - Draft Local Plan Policy CR14 specifies the characteristics of development for other development sites in Central Reading. We recommend the following amendments to the supporting text of Draft Policy CR14. <ul style="list-style-type: none"> The text should include, "given the positive contribution of student accommodation to housing need, any references on the site specific allocations to residential can also be interchanged with student accommodation." 	No change proposed. These sites are required to meet Reading's substantial need for general housing, not student accommodation, for which a specific need is not as clearly demonstrable.
Environment Agency	Policy CR14a	CR14a: Ensure Sustainability Appraisal and allocation are consistent with regard to contamination.	No change proposed. The Council does not have any indication that this site is likely contaminated. General policies such as EN16 will apply in any case. There is a reference to contamination in the Sustainability Appraisal, which is an error. Due to the fact that the site is also within the floodplain and air quality management area, the appraisal in relation to human health (objective 11) would not change.
Historic England	Policy CR14b	Policy CR14b - Historic England welcomes the requirement for development to take account of potential archaeological significance in Policy CR14b, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy CR14c	Policy CR14c - Historic England welcomes the requirement in Policy CR14c for development to avoid detrimental impacts on the significance	Noted. No change needed.

		of the listed building on this site, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework	
Historic England	Policy CR14d	Policy CR14d - Historic England welcomes the requirements in Policy CR14d for development to avoid detrimental impacts on the significance of the listed building and the Conservation Area and their settings, and to take account of potential archaeological significance, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Sonic Star Properties Ltd	Policy CR14d	<p>The site (Former Bristol and West Arcade and 27 32 Market Place) is located within Reading Town Centre, on the principal shopping streets of Friar Street and Market Place. The site lies partly within the Market Street and London Street Conservation Area. 173- 175 Friar Street is a derelict vacant former arcade building constructed in the 1950s comprising ground floor retail units and three floors of vacant offices above. Owing to its abandonment for approximately a decade, the property is in a poor state of repair. Also included in the site are the Grade II Listed properties at 27 – 32 Market Place. All of these properties have also been vacant for a similar period of time. The last use of 28 – 28 Market Place was as a retail unit at basement and ground floor levels with ancillary offices at upper levels. The rear rooms also formed part of the pub at neighbouring 29 – 31 Market Place (The Coopers Arms). The former pub is arranged over basement, ground and three upper floors with the only tradable / public area located at ground floor and ancillary residential accommodation at upper levels. The last use of No. 32 Market Place was as a bank (Class A2) with ancillary offices above.</p> <p>The site is in a key central location, being situated on the corner of the Town Hall Square and in close proximity to Reading rail station to the north (a key transport hub) and key town centre destinations such as</p>	No change proposed. The site is identified as allocation CA14d, and it is not considered that the approach is overly restrictive given the site’s key position in the town centre, part of a conservation area and featuring a listed building. The background to the approach to the site is set out in the Housing and Economic Land Availability Assessment.

		<p>the Oracle to the south. In close proximity to the site are The Town Hall, Reading County Court and the Grade I listed St Lawrence Church. The Forbury Gardens are also within walking distance.</p> <p>Given its location in a prominent position in Reading town centre, it is essential that viable proposals to reinvigorate this vacant and derelict site come forward and that the emerging policies provide a suitable policy framework to enable its delivery. Section 2 of the NPPF seeks to ensure the vitality of town centres. In particular, paragraph 23 provides LPA's with guidance on achieving suitable planning policies that are positive, promote competitive town centres and pursue policies which support their viability and vitality.</p> <p>The principle of redeveloping this site for a mixed use development is considered to be acceptable by virtue of the Site Allocation. This provides a framework for this site to come forwards for redevelopment and includes the provision of ground floor town centres uses (retail and a public house). As it stands the proposed policies within the Draft Local Plan are overly restrictive with regards to the provision of retail uses, and as suggested above should include a mechanism to demonstrate the lack of demand or viability for small units. The adoption of a more flexible policy would enable a scheme to be delivered which includes an important ground floor retail function (and contribution to the town centre function) but which responds more directly to changing market demands.</p>	
Historic England	Policy CR14e	Policy CR14e - Historic England welcomes the requirements in Policy CR14e for development to enhance the Conservation Area and the setting of adjacent listed buildings, and to take account of potential archaeological significance, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy CR14f	Policy CR14f - Historic England welcomes the requirement in Policy	Noted. No change needed.

		CR14f for development to avoid detrimental impacts on the significance of this listed building and the Conservation Area, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	
Hammerson Plc, Owner of the Oracle Shopping Centre	Policy CR14g: The Oracle Extension	<p>As owner of the Oracle Shopping Centre and therein a major stakeholder in Reading, we do not consider the Local Plan to be sound. Reading Town Centre is recognised as one of the UK’s most important centres, with its retail offer boosted by the opening of The Oracle in the late 1990’s. It should also be recognised, however (in Chapter 4.6 of the Local Plan) that Reading Town Centre faces increasing competition from other centres in the Region, notably Bracknell and Oxford and that, to maintain its position and strength, it needs to develop and evolve. Site allocation CR14g recognises that there is a scope to extend The Oracle Shopping Centre at Bridge Street and Letcombe St. However, other opportunities exist to extend The Oracle Shopping Centre through either better utilisation of land within the control of Hammerson or through an extension onto neighbouring land. These opportunities, being actively explored by Hammerson, could come forward during the life of this emerging plan (i.e. before 2036) and Site Allocation CR14g should be redrafted to reflect this. In order for the Local Plan to meet the test of soundness and specifically reflect a strategy that meets development requirements, the allocation should increase the quantum of floorspace an extension to The Oracle is capable of delivering. Modifications are as follows:</p> <p><i>CR14g The Oracle Extension. Development of areas at The Oracle Shopping Centre and on adjoining land for retail. Development should:</i></p> <ul style="list-style-type: none"> • <i>Address flood risk issues;</i> • <i>Enhance the setting of the Conservation Area;</i> • <i>Take account of potential archaeological significance; and</i> • <i>Address any contamination on site.</i> <p><i>3,000 – 7,500m² of retail or town centre uses.</i></p> <p>Hammerson do wish to appear at the examination in public in order to</p>	<p>No change proposed.</p> <p>The Council is not opposed to the principle of expansion of the Oracle, as reflected by the existing allocation CR14g. However, no alternative options for other potential extensions have been presented to the Council for assessment. The representation seeks something of a blank cheque for expansion. It is not considered that this is appropriate without further detail on what that would entail. There are constraints in this area, notably the presence of a conservation area, scheduled ancient monument and listed buildings nearby, and flood risk. The supporting text acknowledges the potential for expansion of the Oracle, but states that these should be considered on their merits.</p>

		explain the development requirements for the Oracle Shopping Centre.	
Historic England	Policy CR14g	Policy CR14g - Historic England welcomes the requirements in Policy CR14g for development to enhance the setting of the Conservation and to take account of potential archaeological significance, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy CR14h	Policy CR14h - Historic England welcomes the requirements in Policy CR14h for development to make a positive contribution to the Conservation Area and the setting of nearby listed buildings, and to take account of potential archaeological significance, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy CR14i	Policy CR14i - Historic England welcomes the requirements in Policy CT4i for development to avoid detrimental impacts on the significance of the listed building and the Conservation Area, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy CR14j	Policy CR14j - Historic England welcome the requirements in Policy CR14j for development to enhance the setting of nearby listed buildings and to take account of potential archaeological significance, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy CR14k	Policy CR14k - Historic England welcomes the requirements in Policy CR14k for development to enhance the setting of nearby listed buildings and the Conservation Area and to take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the	Noted. No change needed.

		National Planning Policy Framework.	
Historic England	Policy CR14l	Policy CR14l - Historic England welcomes the requirements in Policy CR14l for development to avoid detrimental impacts on the significance of the listed building and the Conservation Area, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Environment Agency	Policy CR14m	CR14m <ul style="list-style-type: none"> In the fifth bullet point, we are pleased to see the inclusion of ‘...and set buildings back at least ten metres from the top of the bank of the river,’ For consistency, this wording should be used throughout the document when referring to ecological buffers to watercourses. A sixth bullet point should be added: ‘Not impact on the operation of the lock and weir.’ 	Agreed. Change proposed. This additional criterion should be added.
Historic England	Policy CR14m	Policy CR14m - Historic England welcomes the requirements in Policy CR14m for development to avoid harm to the setting of the listed Kings Meadow Pool and to take account of potential archaeological significance, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy CR15	Policy CR15 - Historic England strongly welcomes and supports Policy CR15, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Paragraph 5.4.40	Paragraph 5.4.40 - Historic England welcomes paragraph 5.4.40 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy CR16	Policy CR16 - Historic England welcomes Policy CR16 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by	Noted. No change needed.

		paragraphs 126 and 157 of the National Planning Policy Framework.	
LaSalle Investment Management	Policy CR16: Areas to the North of Friar Street and East of Station Road	<p>We do not consider this policy to be sound. Our client controls the site at 15-18 Friar Street, 2-16 Station Road and Harris Arcade. As such our client’s previous representations, submitted on 13 June 2017, in response to the Reading Borough Council’s (RBC) Draft Local Plan in respect of 15-18 Friar Street, 2-16 Station Road and Harris Arcade (‘the site’) still stand.</p> <p>Not Positively Prepared – The Pre-Submission Draft of the Local Plan does not properly address the identified local development requirements at the site. According to the NPPF, in order to be thought of as ‘positively prepared’ the plan should seek to “meet objectively assessed development and infrastructure requirements...” The Local Plan as currently prepared would fail to deliver the significant level of development for which there is an acknowledged capacity and requirement, in Central Reading. This is because Draft Policy CR16 as drafted precludes ‘wholesale redevelopment’ within the ‘Area to the north of Friar Street and east of Station Road’, a key central development site.</p> <p>The site as existing comprises a mix of retail and main town centre uses (including leisure and drinking establishments) and is located immediately adjacent to the Station/River Major Opportunity Area boundary. The western side of Station Road, opposite the site, is included within Policy CR11a and is identified as a Site for redevelopment as set out above. The western side of Station Road is also the boundary of the Station Road Tall Buildings Cluster area where buildings of 10 storeys and above would be considered. It is recognised that the landholdings within Draft Policy CR16 are unlikely to accommodate tall buildings, although the policy ought to recognise that in accordance with good design principles there may be opportunities to make better use of parts of the site. Station Road is identified as an essential north-south link where a high quality public realm is vital to integrating the Station Area with the existing shipping core. In</p>	Change proposed. The amendments suggested would fundamentally change the meaning of the policy, and could lead to developments that significantly affect the character and role of the site. However, the purpose of this policy was not to preserve the whole site in aspic, and it is accepted that there is potential for rewording to allow beneficial development to take place that ensures the future of the site whilst retaining the key elements of its character. Some wording changes are therefore proposed to achieve this.

		<p>recognition of this, we support the cluster of small local businesses within the Harris Arcade and seek to enhance the fine-grain retail offer through comprehensive consideration of development opportunities. In addition, Friar Street is included within the Friar Street Business Improvement District which includes the main retail, financial and night time economy uses.</p> <p>Massing – It is considered that the existing Site represents an opportunity for a phased redevelopment. A redevelopment scheme would have the potential to increase the efficiency of the site through careful and well considered increase in density as part of comprehensive proposals that consider the individual components, but also the site as a whole. Additional development across very low density parts of the site could be explored subject to good design and appropriate consideration of the townscape. It is recognised that County House provides a very strong element of the overall massing at the crossroads. It is considered that there is potential for at least, an extension into the service yard off Winston Terrace and for additional height, and massing to the predominantly single storey western part of the site.</p> <p>Uses – The Site is located within the RCAAP which will be “promoted and maintained as a top-class location for business, retail, leisure, culture and learning... the focus for continued high class mixed use development”. It is therefore considered that the Site represents an opportunity for redevelopment for a range of uses with active frontages on the ground floor and a mix of uses on the higher floors. In our view, a broad range of uses could be explored for the site, as follows:-</p> <ul style="list-style-type: none"> a. Retail and main town centre uses (including leisure and drinking establishments) as the Site is in the Primary Shopping Area, Central Core and an Active Frontage location; b. Hotel uses – as the Site is in the Central Core with the Central Area identified as the prime focus for major leisure, cultural and non- 	
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		<p>regionally significant tourism development; c. Office use – as the Site is in the Office Core; d. Student Accommodation given the accessibility to higher education and further education institutions in terms of walking, cycling and accessibility of all town centre bus services; e. Residential use in accordance with town centre aspirations. Therefore the document is unsound as it fails to maximise the development potential of the ‘Area to the north of Friar Street and east of Station Road’.</p> <p>The following wording is suggested for Draft Local Plan Policy CR16: “The <u>function of the</u> area east of Station Road and north of Friar Street, as shown on the Proposals Map, makes a positive contribution to the character of the town centre. <u>Where possible, development proposals should seek to enhance and sustain</u> the character of the <u>retail units within the Harris Arcade and the buildings fronting the streets will be conserved and, where possible, enhanced.</u> <u>Whilst there will be is</u> potential for <u>some</u> the conversion of buildings and, <u>potentially, some</u> development within the site that does not detrimentally affect its overall character. <u>Proposals for wholesale comprehensively considered redevelopment and enhancement of the area will not be supported as a positive opportunity to contribute to the mix of uses within this part of the town centre, in the context of wider town centre policies and other material considerations.”</u></p>	
Historic England	Paragraphs 5.4.41 and 5.4.42	Paragraphs 5.4.41 and 5.4.42 - Historic England welcomes paragraphs 5.4.41 and 5.4.42 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Reading Football Club	Paragraph 6.1.3	RFC also consider it important that the emerging Local Plan recognises the significant contribution the REP development would provide to the Borough and wider region within the supporting text to South Reading which references Reading Football Club within 6.1.3 of the Pre-	Agreed. Change proposed. This update sits better in paragraph 6.1.4.

		Submission Plan.	
Wokingham Borough Council	Section 6.2	Section 6 of the Plan concerns the South Reading Area, including potential development at Grazeley. There is no commitment at the stage to take the proposal for development at Grazeley forward. The land lies within Wokingham Borough and West Berkshire District areas but would have strong links to Reading. One of the key principles for the south Reading area, set out at paragraph 6.2.1.d. of the plan, recognises the importance of enhanced transport connections to any development at Grazeley, should this occur. WBC welcomes this inclusion within the plan. Figure 6.1 includes an indicative MRT route access the M4 from the Grazeley area towards the existing Park and Ride at Mere oak which is also welcomed. WBC considers the strategic transport elements of the Plan to be sound. WBC would welcome on-going co-operation on transport schemes, including improved bus services, which will enhance connections between Reading Borough and Wokingham Borough.	Noted. No change needed. Discussions around this issue will continue under the duty to co-operate.
Mapletree Investments Pte	Policy SR1	GPR still maintains that Opportunity Area SR1, Island Road should focus on B2 and B8, uses where B1 uses would be wholly ancillary. While the policy loosely has regard to this by stating that: “new business space comprising mainly industrial and warehouse uses, with some supporting office uses,” we would prefer more overt wording to reflect GPR’s intent. GPR previously resisted proposals in paragraph 6.3.3 which directed the Mass Rapid Transit to be directed through this site, rather requesting it to be directed toward Green Park Station. This paragraph remains unchanged. GPR therefore maintains its position in that the MRT should be directed to where it would capture most passengers. This would be Green Park and office users rather requesting it to be directed towards Green Park Station. This paragraph remains unchanged. GPR therefore maintains its position in that the MRT should be directed to where it would capture most passengers. This would be Green Park and office users rather than the Island Road area which will have much lower employee/passenger movements.	No change proposed. In terms of reference to offices, the policy already includes the emphasis on industrial and warehouse use, but it cannot ignore the existing implemented permission. The sub-area policies make clear that it is only SR1c where significant office will be appropriate, in line with the existing permission. In terms of the MRT route, it is not agreed that it is inconsistent with provision of a MRT route further south, which the Local Plan clearly shows as the main option. It should be noted that the permission recently granted at SR1c includes a safeguarded alignment for MRT along its southern boundary.
Environment Agency	Policy SR1	SR1: At the end of point v, please remove ‘based on the findings of an ecological assessment,’ as the biodiversity of all watercourses and their	Partly agreed. Change proposed. The reference to the findings of an ecological assessment was

		riparian corridors should be protected and enhanced, irrespective of the findings of an ecological assessment.	in response to comments on the Draft from Natural England, so should be retained. However, the wording can be amended to clarify that protection is not based on the findings of an assessment, but rather should take it into account.
Highways England	Policy SR1	SR1: Island Road Major Opportunity Area – SR1 has not materially altered and therefore all previous Highways England comments on this policy remain unchanged. <i>[Draft Local Plan comment: It is proposed that development in the Island Road Major Opportunity Area will provide approximately 120,000 to 150,000 sqm of new business space comprising mainly industrial and warehouse uses. Given the potential impact of the site on the M4 it is requested that any potential adverse impacts to the safe and efficient operation of the SRN be appropriately considered, managed and mitigated, in line with NPPF and Circular 02/2013.]</i>	No change proposed. Transport modelling work for the overall levels of development has been completed and is set out in the evidence base, and has been provided to Highways England.
Roxhill Developments, Ltd	SR1-Island Road Major Opportunity Area	We consider that the Plan is legally compliant, sound and fulfils the duty to co-operate. We consider that, overall, Policy SR1 meets the test of soundness for the following reasons: a. it seeks to meet objectively assessed needs for new industrial and warehouse development, taking the requirements of the FEMA into account; b. the Sustainability Appraisal recognises that the site would bring positive effects with regard to economic development and employment, minimisation of damage to undeveloped land and others; c. SR1 represents an opportunity to contribute towards objectives set out in the Thames Valley Berkshire LEP's Strategic Economic Plan, including addressing pockets of unemployment in Reading and recognising the importance of the connectivity of the area; d. The site provides an opportunity to assist in the management of the relationship between employment development and housing in South Reading; e. The area combines strong demand for B8 space and a prime location (A33 corridor); and f. recognises logistics as an economic contributor, higher than average salaries, technological progress and productivity. The allocation is	Noted. In terms of the detailed points, the response is as follows: <ol style="list-style-type: none"> 1. Partially agreed. Change proposed. It is accepted that development may come forward as more than one application, and that this may be acceptable, but there is still a need for development to be cognisant of the potential of other parts of the sub-area. The reference can be amended to enable this. 2. Agreed. Change proposed. This reference should be amended. 3. No change proposed. The potential link between the areas is undeveloped green land in any case. This site is in the functional floodplain, and there is not considered to be particular development

		<p>justified by RBC’s evidence base: the SHMA, FEMA and HELAA. The allocation would be effective, because it would be deliverable over the plan period. The allocation would be consistent with the requirements of the NPPF, which confirms the economic role of planning in building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation.</p> <p>Notwithstanding our support for the overall soundness of Policy SR1, it is considered that the Local Plan would benefit from minor modifications. Modifications are shown in bold and text to be deleted is shown in strikethrough:</p> <ol style="list-style-type: none"> 1. In text relating the SR1a, the meaning of “Development should be considered as a comprehensive whole” is unclear. Moreover, it might be construed as an unnecessary constraint development, given that sites WH017 and WH047 are in different ownerships and in practice commercial occupiers may be identified for different parts of sub-area SR1a at different times. It is considered that the text should be amended as follows: “Access to the dDevelopment should be considered as a comprehensive whole.” 2. Figure 6.2 identifies the area of land to the immediate north of sub-area SR1a as “Nearby sensitive location – wildlife and landscape.” However, feasibility plans being discussed with RBC have shown this area could accommodate a new managed landscaped wetland area as part of the Sustainable Drainage Strategy for sub-area SR1a. It is considered that the key relating to this area should be amended as follows: “Nearby sensitive location – wildlife, and landscape and water features.” It is considered that this minor modification would also ensure that SR1 is more consistent with Policy EN12. 	<p>potential.</p> <ol style="list-style-type: none"> 4. Partly agreed. Change proposed. The route is intended to be indicative only, and following a specific boundary would be likely to give a false impression of a route having been determined. However, the key should be amended to clarify that this is indicative. 5. No change proposed. The relevant policy that the wording should reflect is EN13 on Major Landscape Features, and the existing wording is in line with that policy. 6. No change proposed. This reference is to drainage, water quality and flood risk. It is not considered that any negative effects on these key matters should be enabled by policy. 7. Agreed. Change proposed. This reference should be amended.
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		<p>effects, as follows: “Avoid significant negative impacts on drainage...”</p> <p>7. For the sake of clarity and consistency with Figure 4.8, the seventh criterion of Policy SR1 should be amended to make reference to the proposed Mass Rapid Transit route, as follows: “Safeguard land which is needed for proposed mass rapid transit routes and stops.”</p> <p>It is considered that the above changes should be introduced as minor modifications in advance of the adoption of the Local Plan. We wish to appear in person at the public examination.</p>	
Environment Agency	Policy SR1a-c	SR1a-c: Ensure Sustainability Appraisal and allocation are consistent with regard to contamination.	No change proposed. The SA and allocation are consistent. Policy SR1 recognises the contamination issues, and these are also reflected in the Sustainability Appraisal of sites SR1a, b and c, with the issue being particularly significant for residential options.
Environment Agency	Policy SR1a	SR1a: The words ‘measured from the top of the river bank’ should be added between ‘and a 10m undeveloped buffer’ and ‘to the watercourse to the east.’	Agreed. Change proposed. This reference should be added.
FCC Environment	SR1a: Former Landfill at Island Road	We consider that the Local Plan is legally compliant, sound and fulfils the duty to co-operate. It is considered that the policy is sound as it provides for bringing underused/potentially despoil land back in a positive use whilst meeting a need for employment land in the area. Having an industrial and commercial designation on land adjoining the existing recycling facility will limit the potential for any amenity concerns and also provides opportunities should the existing facility wish to expand. Thus helping to provide enhanced resource management facilities in accordance with the waste hierarchy. It is agreed that industrial proposals should be located towards the northern boundary of the designation. But draft Policy SR1a should recognise the need for existing businesses to expand in the future, especially given the levels of growth/development allowed for by the Local Plan. Therefore the following wording should be included in the last sentence of the draft	No change proposed. There are no existing businesses within site SA1a. There is nothing to prevent business that are to locate on the site expanding in the future, but this will need to be considered on its merits at the time that it is proposed.

		policy. "Development should be considered as a comprehensive whole but also respect the future needs of existing businesses." We would like to appear in person at the examination to ensure that the future interests of FCC Environment and the services it provides to Reading and the surrounding area are adequately protected.	
Environment Agency	Policy SR1b	SR1b: Please add that the ecological buffer to the River Kennet should be a minimum 10m wide, measured from the top of the river bank.	No change proposed. The buffer to the river is already shown on Figure 6.2 and will need to be wider than 10m in any case to comply with this.
Highways England	Policy SR2	SR2: Land North of Manor Farm Road Major Opportunity Area – SR2 has not materially altered and therefore all previous Highways England comments on this policy remain unchanged. <i>[Draft Local Plan comment: It is proposed that the Manor Farm Road site will be re-developed to provide between 680 and 1,020 dwellings, as well as some retail and leisure uses. Given the potential impact of the site on the M4 it is requested that any potential adverse impacts to the safe and efficient operation of the SRN be appropriately considered, managed and mitigated, in line with NPPF and Circular 02/2013.]</i>	No change proposed. Transport modelling work for the overall levels of development has been completed and is set out in the evidence base, and has been provided to Highways England.
Historic England	Policy SR2	Policy SR2 - Historic England welcomes the requirement for development to take account of potential archaeological significance in Policy SR2 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Wokingham Borough Council	Policy SR2	In regard to site allocation SR2, Wokingham Borough Council requests that it is consulted when a planning application is submitted regarding any cross boundary impacts that development may have.	Noted. No change needed.
Booker Group PLC	Policy SR3: South of Elgar Road Major Opportunity Area	We welcome the continued identification of the 'South of Elgar Road Major Opportunity Area' for a residential-led allocation. Booker welcome the objective to accommodate around 3,700 homes in South Reading up to 2036 (increased from 3,100 in the Issues and Options document). We welcome that Policy SR3 includes 330-500 dwellings of the total in South Reading. We welcome that it has been amended since our previous representations to include reference for potential	Noted. No change needed. The policy already confirms that the potential of the site is indicative. Within the context of some of the densities that will be achieved in parts of Reading in the centre, a reference to 'high density' would be misleading, and would not

		<p>commercial uses to be incorporated as part of any future mixed-use development. We also welcome that part i of SR3 has been amended to allow for greater flexibility in the measures that could be utilised to ensure that there are no adverse effects on amenity as a result of proximity to adjacent industrial and warehouse uses. A buffer, as proposed in an earlier iteration, may not be the only suitable means of achieving this. We would like the Council to confirm that the range of residential units is indicative. The number of dwellings to be delivered on site would be dependent on the scale, massing and quantum of development which includes other uses as part of a mixed use development and the Opportunity Area being redeveloped in its entirety, including both the Makro site and adjacent land in separate ownership. We request that the following wording be added: <i>“The redevelopment of the site offers an opportunity to accommodate high density development.”</i> Booker also acknowledge and support the proposal to enhance pedestrian access between Elgar Road and Waterloo Meadows. We also consider that vehicular access could be improved through the addition of a further access point along Elgar Road south. Booker appreciate that further technical transport work will be required as part of a future application for the site, but request an additional access point is added.</p>	<p>reflect the sensitivities of the local area.</p> <p>It is not considered that an additional access point should be added to the policy without being subject to technical work, and this would need to be dealt with at application stage should it be required.</p>
Highways England	Policy SR3	<p>SR3: South of Elgar Road Major Opportunity Area – SR3 has not materially altered and therefore all previous Highways England comments on this policy remain unchanged.</p> <p><i>[Draft Local Plan comment: It is proposed that 330-500 dwellings would be provided on the South of Elgar Road site. Given the site location, it is unclear whether or not they will impact the SRN, either individually or cumulatively. Ahead of the Revised Draft Local Plan stage we would like to work with you to assess the potential impacts of this site on the SRN and consider any potential SRN mitigation measures that may be needed to successfully deliver the sites. This is required to demonstrate how any adverse impacts to the safe and efficient operation of the SRN will be managed and mitigated.]</i></p>	<p>No change proposed. Transport modelling work for the overall levels of development has been completed and is set out in the evidence base, and has been provided to Highways England.</p>

Historic England	Policy SR3	Policy SR3 - Historic England welcomes the requirement in Policy SR3 for development to give careful consideration to the archaeological potential of the area and be supported by appropriate archaeological assessment, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Environment Agency	Policy SR4a	SR4a <ul style="list-style-type: none"> Amend the first bullet point to read “Include a landscaped ecological buffer a minimum of 10 m in width to the River Kennet, measured from the top of the bank of the watercourse, to ensure no detrimental impacts ...” Omit “wherever possible” at the end of the sentence in this bullet point. Add to the end of the second bullet point “to the stream and its associated river corridor. This will include an undeveloped ecological buffer zone of at least 10 m width measured from the top of the bank on both sides of the watercourse.” 	No change proposed. The reference to an ecological zone fail to recognise that this is a site with existing public access directly along the riverbank that should not be lost, and it is not achievable for this to have a purely ecological role. There should be retention of trees wherever possible, but there may be reasons why individual trees cannot be retained. In terms of the stream across the site, it should be recognised that any deculverting and ecological enhancement is a gain over the current situation, and there needs to be a balance with providing reasonably developable plots of land. Development will need to comply with EN11 in any case.
Historic England	Policy SR4a	Policy SR4a - Historic England welcomes the requirement in Policy SR4a for development take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy SR4b	Policy SR4b - Historic England welcomes the requirement in Policy SR4b for development take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy SR4c	Policy SR4c - Historic England welcomes the requirement in Policy SR4c	Noted. No change needed.

		for development take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	
Environment Agency	Policy SR4d	SR4d: Ensure Sustainability Appraisal and allocation are consistent with regard to contamination.	No change proposed. The SA and allocation are consistent. Policy SR1 recognises the contamination issues, and these are also reflected in the Sustainability Appraisal of sites SR1a, b and c, with the issue being particularly significant for residential options.
Historic England	Policy SR4d	Policy SR4d - Historic England welcomes the requirement in Policy SR4d for development take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Environment Agency	Policy SR4e	SR4e: Third bullet point: We are pleased to see that development should be set back at least 10m from the river, but please add that this should be measured from the top of the river bank and that it should include ecological enhancements.	Agreed. Change proposed. This reference should be added.
Highways England	Policy SR4e	SR4e: Part of Former Berkshire Brewery Site – SR4e has not materially altered and therefore all previous Highways England comments on this policy remain unchanged. <i>[Draft Local Plan comment: As site SR4e is located immediately to the north of the M4 we would like to be consulted about any planned change and/or intensification of use beyond the existing site planning permissions]</i>	Noted. No change needed.
Historic England	Policy SR4e	Policy SR4e - Historic England welcomes the requirement in Policy SR4e for development to enhance the setting of the listed Little Lea Farmhouse as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.

Englefield Estate	Policy SR4f	The estate wishes to express support for the references made within the Draft Plan for development at Grazeley, for example at Policy SR4f.	Noted. No change needed.
Environment Agency	Policy SR4f	SR4f: We are pleased to see that development should be set back at least 10m from the river, but please add that this should be measured from the top of the river bank and that it should include ecological enhancements.	Agreed. Change proposed. This reference should be added.
Highways England	Policy SR4f	SR4f: Land South West of Junction 11 of the M4 – SR4f has not materially altered and therefore all previous Highways England comments on this policy remain unchanged. <i>[Draft Local Plan comment: The West of Berkshire Spatial Planning Framework identifies an opportunity for a major new garden village containing up to 15,000 new homes on land around Grazeley, south of the M4 and within the areas of Wokingham Borough Council and West Berkshire Council. The Local Plan notes that ‘it will be for the local plans for those areas to determine whether such a development is appropriate, and, if so, what the parameters should be’. We would welcome an opportunity to work with RBC, Wokingham Borough Council and West Berkshire Council to ensure that the impact of this site on the SRN is appropriately considered, managed and mitigated in line with NPPF and Circular 02/2013.]</i>	Noted. No change proposed. The three authorities will need to work with Highways England as the proposal evolves.
Historic England	Policy SR4f	Policy SR4f - Historic England welcomes the requirement in Policy SR4f for development take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Wokingham Borough Council	Policy SR4f	Policy SR4f concerns land south west of junction 11 of the M4 and sets out that this land, which comprises 3.84ha within Reading Borough, may be required in association with any major development around Grazeley. Through there is no commitment at this stage to take the proposal for development at Grazeley forward, the identification of this land for potential use in association with any development at Grazeley, is considered to be pragmatic and sound approach. Wokingham Borough council will need to continue to work with its partner	Noted. No change needed. Discussions around this issue will continue under the duty to co-operate.

		authorities to explore options to make any development that may be planned at Grazeley as sustainable as possible.	
Reading Football Club	Paragraph 6.3.18	<p>The Council will be aware the RFC submitted representations in response to the Issues and Options Consultation (January 2016) to assist with the preparation of the Local Plan. Since then, the Council have consulted on a Draft version of the Local Plan in the summer of 2017. The situation concerning the proposals at Royal Elm Park, adjacent to the Madjeski Stadium have also developed since that time. RFC submitted a planning application at Royal Elm Park (“REP”) in Feb. 2016 under reference 160199. The Council considered the application at Planning Committee on the 26th April 2017, at which Planning Committee Members passed a resolution to grant permission, subject to the completion of a Section 106 legal agreement. The Section 106 Agreement is nearing completion, following which, consent will be issued by the Council. Notwithstanding promotion of the site or inclusion within the emerging Local Plan as an allocation, the presence of a motion to grant in relation to the above-mentioned development has led the Council to consider the site to be a commitment. In accordance with other sites within Reading which exceed 10 dwellings or 1000 sq. m of employment development, which have planning permission, the Council have stated within paragraph 7.3.18 of the Pre-Submission Local Plan that there is not considered to be a need to identify these sites within a policy, as the permission establishes the principle of development. The Council continues to state, within paragraph 7.3.18 of the Pre-Submissions Plan that “any future applications on these sites will be acceptable where they are substantially the same as the existing permission” and “will need to be considered against the policies in the plan, in particular whether it would adversely impact the likelihood of meeting Reading’s identified development needs.” RFC agree with the principle of the Council’s comments as stated above, however, wish to comment on the table which summarises major development progress, to the top of page 194 of the Pre-Submission Plan, which is stated as being correct to 31st</p>	Agreed. Change proposed. This is a factual update, and the table should be amended with this development, and other tables similarly updated.

		<p>March 2017. This referenced table is now out of date. Prior to adoption of the Local Plan the table should be updated to include the REP scheme which currently has a resolution to grant permission and is further anticipated to receive permission prior to the adoption of the emerging Local Plan. Should this referenced table be updated to refer to the REP scheme, as is understood to be the intention of the Council, RFC would on that basis consider the Local Plan sound with reference to REP. REP will provide significant residential, retail and leisure provision within Reading Borough, and its contribution towards the objectives of the Local Plan should be reflected by its recognition within the aforementioned table concerning development progress.</p>	
Sport England	Policy SR5	<p>SR5: Leisure and Recreation use of Kennetside Area – Sport England is supportive of this policy but believes it would be more robust if there was an adopted Built Facilities Strategy and Playing Pitch Strategy to set out in the Local Plan which sports facilities will be brought forward to benefit the community.</p>	<p>Noted. No change needed. This is accepted, although the low-intensity nature of the site is unlikely to lend itself to built leisure facilities.</p>
Tarmac	Policy SR5	<p>Policy SR5: Leisure and Recreation Use of the Kennetside Areas - Tarmac support the provisions of Policy SR5 to promote sites for low-intensity leisure and recreation use.</p>	<p>Noted. No change needed.</p>
Thames Water	Policy SR5	<p>SR5: Leisure and Recreation Use of the Kennetside Areas - Whilst we do not object to the Policy itself, we have a concern with regards to a marina being a potential use. Thames Water would need to be satisfied that there would be no adverse impact due to, for example, increased turbidity. If the Council decide to proceed with the above policy we would request that the last paragraph of the Policy is amended to read: “Any proposals will need to demonstrate that there will be no adverse impacts on biodiversity, flood risk, landscape, public foot and cycle access along the river and the operation and condition of the river and the operation of the adjacent Water Treatment Works. If a proposal results in additional use of the Kennet by boats, it should not have an adverse effect on the River Kennet Site of Special Scientific Interest further upstream.” And the additional text included as supporting text “Thames Water should be contacted at the earliest opportunity to</p>	<p>Agreed. Change proposed. These references should be added.</p>

		discuss any potential proposal.”	
Environment Agency	Paragraph 6.3.20	6.3.20 – With regard to any proposed marina development, consideration would have to be given to the potential for additional boat traffic to have a deleterious impact on the River Kennet Site of Special Scientific Interest further upstream.	No change proposed. This is already referenced within the policy itself.
Historic England	Paragraph 7.2.1	Paragraph 7.2.1 - Historic England welcomes key principle g (“Areas of landscape and heritage importance will be preserved.....”), as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework, although we prefer the term “conserved” to reflect better the terminology of the National Planning Policy Framework and as recognising that sensitive change can take place that maintains or even enhances the significance of heritage assets.	Agreed. Change proposed. This reference should be amended.
Historic England	Paragraph 7.2.7	Paragraph 7.2.7 - Historic England welcomes the commitment to the “preservation” of important heritage assets, including four conservation areas and a historic park, in paragraph 7.2.7 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework, although we prefer the term “conserved” (and “enhanced”) to reflect better the terminology of the National Planning Policy Framework and as recognising that sensitive change can take place that maintains or even enhances the significance of heritage assets.	No change proposed. The reference to heritage assets already uses 'conserved'. The reference to preservation is to landscape and the AONB.
Sport England	Policy WR1	WR1: Dee Park – I would reiterate our comments on the draft Local Plan submitted in June 2017: Sport England would encourage the Council to confirm in the policy that any existing playing field and sports facilities within the development area will be protected or replaced. The Council should use its Built Facilities Strategy and Playing Pitch Strategy to set out in the Local Plan which sports facilities will be brought forward to benefit the community.	No change proposed. It should be noted that this development is already covered by an outline planning permission and a number of reserved matters permissions, and much of the development has already been completed.
Ellis, Liz	WR2: Park Lane	I do not think this part of the plan is sound or fulfils the duty to	No change proposed. The benefits of the

	<p>Primary School, The Laurels and Downing Road</p>	<p>cooperate. In the Tilehurst area, there is already little free space. Tilehurst bounds West Berkshire. The West Berkshire Local Plan proposed allowing the building of a large number of new houses immediately on the border of Tilehurst. The sites are Land to the east of Sulham Hill, Tilehurst – Policy HSA8, Stonehams Farm, Tilehurst (EUA003) – Policy HSA9 and Stonehams Farm, Long Lane, Tilehurst (site reference EUA008). These sites are listed on pages 29 to 34 in the Housing Site Allocations DPD (2006-2026) West Berkshire Council: Adopted May 2017. It is proposed that these sites will provide the delivery of 35, 15 and 60 dwellings respectively. That is a total of 110 homes which should have an emphasis on family housing. As seen in the West Berkshire Council Local Plan, these sites border West Tilehurst. In their plans, there is no mention of providing any local infrastructure, such as schools, surgeries, pharmacies, etc. The implication is that inhabitants will use facilities provided in West Reading (Tilehurst). In addition there appears to have been little or no collaboration between West Berkshire and West Reading to determine how appropriate services and infrastructure should be provided. The Park Lane School site provides junior schooling for the children of Western Tilehurst. It has its own playing field in Downing Road. It must be noted that the playing field is the only bit of open space in this area of Tilehurst that is suitable for playing sports. Once it has gone, there will be no other. Much has been made of the fact that the infant school, The Laurels, is not on the same site as the junior school, Park Lane School, but in general this is not seen as an impediment to providing a good level of education both in the Infants and Junior Schools. Now in this version of the Local Plan, it appears that it is intended to sell off the site of Park Lane School including the Downing Road playing field to provide residential housing (45 to 55 dwellings). The education authorities have for many years attempted to persuade those that will listen that it is expedient to take this course of action for the good of our future. Although there is a general move to amalgamate infant and junior education into one site and provide one primary level of schooling it is</p>	<p>scheme in terms of consolidation on a single site have been set out previously and are outlined in the supporting text. This was discussed at the Examination into the SDPD and, with modifications (which remain in the Local Plan) was considered to be justified and effective. The Local Plan policy does not propose a loss of school places, and ensures that replacement library and health provision will be provided.</p> <p>A Draft Playing Pitches Strategy has been undertaken which looks at Downing Road, which is not in use for community sports provision. It concludes that the site could be developed if mitigation were provided in terms of provision of youth 11 vs 11 pitches.</p> <p>In terms of meeting infrastructure needs across the whole area, the Council has undertaken extensive co-operation with West Berkshire on both their Housing Site Allocations DPD and on RBC's Local Plan, and this has included consideration of infrastructure priorities. Duty to co-operate issues are considered in more depth in the Duty to Co-operate Statement. It should be noted that, within the context of growth elsewhere, the cumulative amount of development in Tilehurst is not as significant as seen elsewhere.</p>
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		<p>often for financial reasons rather than educational reasons. There is little evidence to show that a primary school on one site provides for a better education. Section 7.3.5 gives no rationale or evidence as to why the current arrangement provides an unsatisfactory primary education environment. And indeed it does not suggest how packing a nursery school, an infant school, a junior school, a library and a health clinic on to a small site – with practically no play or sports fields, will benefit our children. Moreover the plan as outlined suggests that the Blagrove nursery will also be incorporated into the Laurels site. The proposed replacement school on the Laurels site will be a smaller school on a smaller site and will have practically no playing field space. So at a time when there will be a requirement to have a larger school to accommodate the increase in the local population together with that of West Berkshire too (potentially as many as 160 families) the local authority plans to decrease the number of school places and build on the only playing field in this area. This cannot be sound. In particular, The Laurels site cannot possibly provide sufficient room to school all these new children. When the idea for the redevelopment of the new Laurels school was first mooted it was rejected by many local people. Rightly they thought that the authorities were planning to take Blagrove Recreation ground to be part of the Laurels site. The authorities have no absolute right to do so. That was established after a public inquiry. In addition, section WR2 of the plan mentions that Tilehurst Library and the Health Clinic are currently on the Laurels Site. There is no mention of how these services will be retained if the plan to move the junior school to the Laurels site is undertaken. It smacks of squashing a large number of necessary services into a very small space with no room for manoeuvre at a later stage when services for an even larger population are required. The inhabitants of Tilehurst will be very much impoverished if the plan to release Park Lane school site and the Downing Road Playing Field for housing goes ahead. Site W2: Park Lane Primary School, the Laurels and Downing Road should be removed from the local plan. It is unsound in that it does not meet development and</p>	
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		<p>infrastructure requirements for west Tilehurst, nor does it include providing for any infrastructure required by the neighbouring authority. There will, in the not too distant future, be a requirement for increased numbers of school places. There is no evidence that any discussions have been undertaken between West Berkshire and West Reading to determine how any of the required infrastructure and services required will be required. I do not wish to appear in person at the examination.</p>	
Cottee, Jenny	WR2: Park Lane Primary, The Laurels and Downing Road	<p>I do believe the Local Plan is legally compliant, but it is not sound. This section does not mention a very significant matter: the number of Early Years School places on the site. It appears that implementing the unaltered plan would result in the total number of Early Years places being very significantly reduced. This matter has not been the subject of any public consultation. It is this avoidance of a difficult issue that renders this section unsound. It appears that the much-needed places currently provided in both schools (Blagrove Nursery School and Park Lane Primary School) that will be accommodated within the scheme, not elsewhere in the vicinity. There has been no mention of the retention of Early Years places; the matter of re-provisioning the number of Early Years places has not been addressed in publicly available documents. The following modifications should be made—Include in 7.3.4 after car parking and associated facilities, <i>replacement Early Years school provision</i>, replacement library, health clinic; Include in 7.3.6 the following new sentence after the first one, <i>The replacement Early Years provision within the new scheme will match that currently provided by the two schools (Blagrove Nursery and Park Lane Primary)</i>. I would like to appear in person at the public examination. The matter has not been raised in any of the many consultation documents over the years. Blagrove Nursery school, although in ‘temporary’ accommodation has been an important community asset for decades. Its influence to local well-being stretched beyond the youngsters directly catered for. Latterly the influence was achieved through ‘Sure Start’. Previously many less formal methods were successful in supporting families. I have no knowledge of the Early Years provision at Park Lane Primary School, but</p>	<p>Agreed. Change proposed. The intention of the policy was not to indicate that the early years provision would be lost. This should therefore be rectified in the policy.</p>

		believe the issue of the possibility of loss of quality of local Early Years provision needs attention.	
Sport England	Policy WR2	WR2: Downing Road – I would reiterate our comments on the draft Local Plan submitted on June 2017. <i>Sport England recommends that the Council wait until the completion of the Playing Pitch Strategy before allocating this site for development. Sport England therefore objects to this policy as currently worded. Sport England welcomes the Council's intention to allocate no other playing fields in the Borough for development.</i> In addition Sport England could not support pitch improvements to offset the loss of a playing field unless it was supported by a robust and up-to-date adopted Playing Pitch Strategy.	No change proposed. A Draft Playing Pitch Strategy has been completed and included within the evidence base, and has looked at this site in particular. The proposed consolidated school site would include playing fields, and the policy also states that there will be compensation in terms of qualitative improvements. This was discussed at the Examination into the SDPD and, with modifications relating to justification of loss within national policy (which remain in the Local Plan) was considered to be justified and effective.
Thames Properties Limited	Policy WR3a	WR3a: Former Cox and Wyman Site – To the south and east of the site lies in area of existing housing which comprises high density Victoria terraced streets with on road parking. To the north-west and west is the remainder of the Richfield Avenue CEA. The building is unsuitable in terms of layout and design for most modern industrial operations. Cox and Wyman vacated in April 2015 and it has since been let on almost a nil rent basis, however there has been no significant interest to occupy the unit long term on normal market terms. The site is therefore not fulfilling its employment designation and is appropriate for housing. Thus, we support WR3a. The policy implies that RBC's priority for the site is residential use, but commercial use would be considered if demonstrated to be appropriate. Thames Properties have undertaken a comprehensive masterplanning exercise to determine how to make the best and most efficient use of the site having regard to the criteria of draft Policy WR3a. This process, which has included extensive pre-application engagement with RBC's Officers, has culminated in the preparation and submission of a planning application for a high-quality residential development comprising 96 dwellings and areas of public	Noted. No change proposed. The potential for commercial on one edge is included in the policy, as it may help to ease the transition between employment and residential on the site. However, it is not a formal requirement within the policy, and if a successful layout can be achieved without this commercial element, then the policy is worded to allow that to happen.

		open space. Given the island nature of the site, we consider that it is well-suited to a solely residential scheme comprising a mix of housing and apartments with landscaping and open space. It is not considered that the inclusion of commercial uses on the western edge will enhance the overall scheme or assist in improving the transition between residential uses and the adjacent CEA to benefit future residents (as sought by the Spatial Strategy). We agree that the site could be delivered within the short-medium term of the RBC Local Plan period, i.e. 2016-2026.	
Historic England	Policy WR3c	Policy WR3c - Historic England welcomes the requirement in Policy WR3c for development to take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Sport England	Policy WR3d	WR3d: Rivermead Leisure Centre – Sport England supports the Council’s intention to improve the sports facilities at Rivermead. However, given that work to support this was carried out in 2015, it would be prudent to revisit the work to ensure the right facility mix/size of pool is adequate for current and future need.	Noted. No change proposed. The type of facility needed remains as previously set out.
Historic England	Policy WR3e	Policy WR3e - Historic England welcomes the requirement in Policy WR3e for development to avoid detrimental impacts on the significance of the listed building and the Conservation Area as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy WR3g	Policy WR3g - Historic England welcomes the requirement in Policy WR3g for development to enhance the setting of the Conservation Area and nearby listed buildings as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy WR3i	Policy WR3i - Historic England welcomes the requirement in Policy WR3i	Noted. No change needed.

		for development to take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	
NHS Property Services	WR3j: Land at Moulford Mews	<p>The above site was transferred to the NHSPS following the NHS reforms in April 2013. The NHSPS maintain and improve around 3,500 properties nationwide, working with NHS organisations to create safe, efficient, sustainable and modern healthcare and working environments. A major part of NHSPS's role is the efficient management and disposal of properties which are no longer required by the NHS for the delivery of services. It is important to recognise that capital receipt from disposals and any saving will be reinvested in the NHS to provide funding for new improved services and facilities. The site currently comprises of a vacant parcel of land extending to approximately 0.16 ha. The former Battle Hospital which previously occupied the site closed in 2005 and was subsequently demolished, leaving the site vacant. It is bounded by residential in the form of modern terraced houses to the east and a block of flats set over four storeys to the north. To the south of the site (the rear) is the Curzon Club, which fronts onto Oxford Road, whilst a Tesco superstore lies to the west of the site. It is the NHSPS's aspiration to bring forward their land for disposal and it has been in pre-application discussions with the Council (Ref: 171091) to secure the delivery of the site.</p> <p>Policy WR3j - Land and Moulford Mews: The NHSPS fully support the Local Plan's allocation of their land at Moulford Mews by virtue of WR3j. However, the policy is considered unsound as it is currently drafted and does not meet the tests of soundness as set out in paragraph 182 of the National Planning Policy Framework (NPPF). The NHSPS objects to the proposed arbitrary cap on the quantum of development which makes the unjustified assumption that the site can only accommodate 10-16 dwellings without any robust evidence. The site can deliver more dwellings than indicated and this density cannot</p>	No change proposed. The dwelling figures are an indication, as the Local Plan itself notes, and it may be possible to accommodate more (or less) depending on detailed design. The Local Plan states that these will not be applied as a restrictive range or a 'cap' and that detailed proposals may demonstrate that the site should accommodate more, or less. The range specified has been based on the Housing and Economic Land Availability Assessment, and it is considered that this is sufficiently robust evidence to justify a flexible range in a Local Plan allocation.

		<p>be reasonably reached without a detailed planning and design exercise. This policy is also inconsistent with national policy, particularly the NPPF where the intention is to “significantly boost the supply of housing” (paragraph 47), “encourage the effective use of land by reusing land that has been previously developed” (paragraph 17) and “to optimise the potential of the site to accommodate development” (paragraph 58). It also advises Local Plans to “allocate sites to promote the development and flexible use of land” (paragraph 157). Government guidance, set out most recently in the Housing White Paper (February 2017) is also committed to significantly deliver more homes on public sector land. It sees the NHSPS as a key stakeholder in the process and the NHSPS is now being pushed by the DCLG to deliver more housing and at an accelerated timescale. Furthermore, the policy is also at odds with emerging Policy H2 which provides guidance on the appropriate density and mix within residential schemes. The wording of Policy H2 is welcomed as it advocates the need to “maximise the efficiency of land use”.</p> <p>Modifications: Local Plans by nature should be non-prescriptive, allowing policies to be “sufficiently flexible to take account of changing market conditions” (paragraph 50). By imposing an arbitrary ceiling on the number of dwellings that could be delivered eliminates a key element of plan flexibility. We strongly urge that the policy is amended to reflect a higher range of 16-26 dwellings based on the work the NHSPS has already done which will enable a higher rate of delivery for this sustainable urban brownfield site.</p> <p>Summary: For the reasons identified above, Policy WR3j is unsound as it is not justified or consistent with national policy. We therefore strongly urge that the suggested amendments to the policy are taken forward before the examination stage. It is imperative that the site is not subject to overly onerous policies, particularly when the NHSPS is pressured by the White Paper and DCLG to deliver more housing. It also has a</p>	
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		statutory duty to help finance improved healthcare services and facilities nationally through the disposal of their sites.	
Historic England	Policy WR3p	Policy WR3p - Historic England welcomes the requirement in Policy WR3p for development to take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy WR3q	Policy WR3q - Historic England welcomes the requirement in Policy WR3q for development to take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Cottee, Jenny	WR3s: Land at Kentwood Hill	This section is sound. The wording and sense are consistent with other parts of the document (e.g. EN5 and EN13). No modifications are suggested, retain as is. I only wish to appear at the examination if a variation is considered. I am reluctantly content with the loss of ex-allotment land to development proposed in the pre-submission draft, believing that some of this land should have been designated for other purposes. However, if there were suggestion to modify the text protecting the views through the site to the Chiltern escarpment, I would wish to speak.	Noted. No change needed.
Historic England	Policy WR3s	Policy WR3s - Historic England welcomes the requirement in Policy WR3s for development to take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy WR3t	Policy WR3t - Historic England welcomes the requirement in Policy WR3t for development to take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required	Noted. No change needed.

		by paragraphs 126 and 157 of the National Planning Policy Framework.	
Tilehurst Poor's Lands Charity	WR3t, WR3s and EB7Wu	<p>Background - The Tilehurst Poor's Lands Charity (TPLC) was initially created to provide fuel for the poor of the Parish. Over time, the Charity's aims have broadened to provided support for those in need within Tilehurst, with the provision of grants to local people to provide much needed items such as furniture, clothes or white goods. As the name suggests, the Charity owns land, some of which has been sold and the proceeds invested, so that the Charity's income comes from both investments and rents. The Charity owns land at Kentwood Hill, Tilehurst, as shown on the submitted Site Location plan which, as we summarise below, has long been recognised as a potential development location. The land ownership extends to 6.6 ha in total and comprises the following land uses (which are identified on the Site Location Plan): Builder's Yard, Non-Statutory Allotments, Recreation Ground, Two areas of grass/scrubland, Tree filled area. The site is located in a residential area, less than 130 m from the local centre (the Tilehurst Triangle) which provides a wide range of local services and amenities. It is well served by public transport and in close proximity to a number of facilities including schools and GP surgeries. Given the site's location and proximity to services it forms a highly sustainable location which is capable of providing much needed additional housing (including family housing) in Reading.</p> <p>Site history – The site, other than the previously developed area (the builder's yard) is currently allocated as Public and Strategic Open space under Policy SA16 of the RBC Sites and Detailed Policies Document. The tree filled part of the site is a Local Wildlife Site and Major Landscape Feature and includes a number of trees which are subject to Tree Preservation Orders. The previously developed area of the site (the builder's yard) has been the subject of considerable discussion and analysis during the preparation of the Sites and Detailed Policies Document (SDPD) where it was initially identified for residential development for 11-17 dwellings (Policy SA8 of the draft SDPD).</p>	Noted. No change needed.

		<p>However, the allocation was excluded from the SDPD (adopted October 2012) upon the recommendation of the Inspector who considered it would result in piecemeal development that would not address the future of the wider site. Specifically in relation to Policy SA8, the Local Plan Inspector stated: <i>“Both the site allocated in the DPD and the enlarged site advanced by the site owner would result in piecemeal development that is not well related to the surroundings. There would be uncertainty as to the future of surrounding parcels of land. A comprehensive approach is required that deals with all the land between Kentwood Hill and Armour Hill (including the builder’s yard, unused land, the allotments, and playing field) having regard to the needs of the area. Consequently as this policy is not justified by the evidence and contrary to national planning policy it is unsound and should be deleted.”</i></p> <p>Consideration of the Site within the emerging Local Plan – The site was identified within the Issues and Options document which was consulted on in February-March 2016 as site A14: Allotments and Adjacent Land. The IOP identified a number of options for the future of the site including full development, partial development and no allocation. We submitted representations to the consultation support the development of the site for residential development. The site has also been identified in the HELAA as site KE008. The HELAA identifies that the site is available and potentially suitable for residential development with the allotments retained and residential development on the land at Kentwood Hill and Armour Hill. Since, consultation with RBC has confirmed the approach supported by the TPLC of the recreation ground, allotments and tree filled areas being retained as open space and remaining areas of the site allocated for residential development. The draft Local Plan (April 2017) split the site into three proposed allocations, two residential (WR3s and WR3t) and a proposed Local Green Space (EN7Wu). The draft Local Plan also identified a tranche of land both within and beyond the site as an Area of Identified Biodiversity Interest (EN7) and a Major Landscape Feature (EN13). We submitted representations to this consultation</p>	
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		<p>including Indicative Masterplans, Ecological Appraisal, Site Access Appraisal and Initial Landscape and Visual Appraisal. Following the consultation the Council published their Statement of Consultation which provided summaries of the consultation responses received. A total of 8 comments (including 2 objections) were received in relation to draft allocation WR3s and 28 comments in relation to WR3t (including 6 objections). The majority of the comments received were from existing allotment owners requesting the retention of the access and parking to the allotments. This is now addressed within the latest iteration and we expand upon this below. Following the consultation on the draft Local Plan, further discussions with Council Offices took place in relation to the retention of the access and parking for allotments within draft Policy WR3t as Officers responded to the consultation responses received. TPLC confirmed they were prepared to accept the proposed alteration and that they intend to retain (or provide an alternative) water source and maintain taps for the allotments users.</p> <p>Pre-Submission Draft Reading Borough Local Plan (Nov 2017) – As set out in our previous representations, our clients support the principles and broad specifics of the draft allocations in relation to the site (WR3s, WR3t and EN7Wu). In addition to RBC’s evidence base and analysis (which underpins these allocations) the additional evidence base prepared and submitted by our clients (and expanded upon in our previous representations) confirms the appropriateness of this location for residential development. Some minor changes have been proposed (additions underlined):</p> <p>“WR3s – Land at Kentwood Hill Development for residential. Development should: [...]</p> <ul style="list-style-type: none"> • Provide for <u>well-vegetated</u> green links between the copse and the Victoria Recreation Ground, and between the copse and Kentwood Hill; • Avoid adverse impacts on important trees including those 	
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		<p>protected by TPO, <u>and on the stream in the copse; [...]</u></p> <ul style="list-style-type: none"> • <u>Avoid adverse visual impacts on the West Reading Wooded Ridgeline major landscape feature, and ensure views can be gained through the site from the recreation ground and neighbouring streets towards the Chiltern escarpment; [...].”</u> <p>WR3t – Land at Armour Hill Land at Armour Hill provides similar criteria to Policy WR3s with the following differences: [...]</p> <ul style="list-style-type: none"> • <u>Ensure that there is no reduction in vehicle access to, parking for and security of the allotments; [...].</u> <p>The policy then goes on to identify a capacity of 12-18 dwellings on the 0.45 ha site. Our clients support the proposed allocation of the site, and as set out previously, consider a capacity of 18 dwellings to be an appropriate allocation. Our clients support the proposed amendments to the policy. Whilst the compliance of any application proposals against the draft policy criteria within both housing allocations (including the proposed amendments summarised above) would be fully assessed at the planning application stage we have undertaken a review of this, informed by the technical work undertaken to date (including the illustrative masterplans) and anticipate that the requirements set out in the policy would be able to be met within any proposed development scheme, including a suitable access.</p> <p>TPLC support the residential allocation of Kentwood Hill and Armour Hill at the higher end of the proposed capacities identified (62 and 18 respectively). In addition, we note the comments made by RBC in the emerging plan (para 7.3.13) where it is acknowledged that the capacity of allocated sites will ultimately depend on various factors that need to be addressed at the application stage. This is also mentioned in the Statement of Consultation, where RBC responded to a response received in relation to the Armour Hill site that <i>“the Plan accepts that</i></p>	
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		<p><i>the final total may be outside the range specified where it can be justified.</i>” TPLC are supportive of these comments, which mean the sites would have scope to maximise their contribution to the “pressing need” for further housing in Reading and also provide a substantial level of additional family housing as sought by the emerging plan. TPLC also support the retention of the allotments and recreation ground as local green space/public open space (EN7Wu).</p>	
Hicks, Julie	WR3t: Armour Hill	<p>The proposals map identifies WR3s as Armour Hill and WR3t as Kentwood Hill but the policy has it the other way round – I am objecting to the Armour Hill allocation. I consider that the Local Plan is legally compliant, sound and fulfils the duty to co-operate. I am confident that officers at RBC, being aware of these requirements, have sought to meet the as best they can. As a resident on Armour Hill I can confirm that Armour Hill already struggles to cope with the volume of traffic using the street made hazardous due to the steepness which restricts views up and down the road and the narrow carriageway. It is accepted that the suggested site allocation is low but any additional dwellings here will only make the current situation worse. I can also confirm that the allotments provide a useful habitat for local wildlife; badgers, foxes, deer and hedgehogs have all been seen going into or around the allocated site. It seems mean and petty, for the sake of 18 dwellings, to destroy this habitat particularly if the allocation of the adjoining Kentwood Hill site goes ahead. Finally, while I have referred to the steepness and narrowness of the road as being a hazard for drivers, these characteristics with the heavy natural landscaping along the south side of the road lend a pleasant rural appearance and this character should be protected rather than lost. I would like to appear in person at the examination and to be assured that my representation carries as much weight as possible when the Inspector considers the proposed Local Plan. However, if there are others making the same objection, I would be happy to be represented by a fellow objector.</p>	<p>Change proposed. The error on the labelling of the Proposals Map should be corrected.</p> <p>In terms of the principle of the allocation, there is a very significant need for new housing of 699 dwellings per annum, and the Council must consider the contribution that a variety of sites, including such greenfield sites can make to addressing this issue.</p> <p>The policy ensures that biodiversity is taken into account in any proposals. The part of the land of greatest wildlife significance is the Withies copse, and this is preserved and protected in the Local Plan, together with green links linking it into the wider Green Network.</p> <p>The policy also ensures that any development should assess and mitigate any impacts on the Armour Hill/Kentwood Hill junction. Transport Modelling for the Local Plan did not show that the immediate surrounding roads would be over capacity.</p> <p>The policy also requires retention of a landscaped border to Armour Hill.</p>

Tilehurst Allotments	WR3t: Land at Armour Hill	We believe that this section is legally compliant and sound. The wording and aims are consistent with other parts of the document (e.g. EN8). Furthermore, this section reflects findings at an earlier planning inquiry and instructions of planning inspector to prevent piecemeal development of land owned by the Tilehurst Poor Lands Charity. We do not suggest any modifications and would only like to appear at the examination if further changes are proposed. Members of the Tilehurst Allotment Society Committee have extensive experience of this site and an understanding of how the planning process affects development. We wish the Local Plan to be an effective tool throughout its 20-year life. A representation of the Society could illustrate the problems that would arise if constraints on potential development of the land were loosened.	Noted. No change needed.
Stephen Hicks (representing signatories of enclosed petition)	WR3t: Land at Armour Hill and WR3s: Land at Kentwood Hill	We consider the plan to be legally compliant, but not sound or fulfilling the duty to co-operate. The allocation of site WR3t for 12-18 dwellings does not take into account the adjacent WR3s allocation for 41-62 dwellings. Therefore the cumulative effect of the proposed housing allocation is not being holistically assessed. The allocated areas largely comprise long established allotment use and mature amenity and open space protected for the benefit of the Tilehurst's poor. The amenity land is both an important wildlife haven/green lung but also provides a natural woodland setting to the existing boundaries of the Armour Hill and Kentwood Hill roadways. There is increasing demand for allotments in Reading and a desire for community and individual 'self-grow' projects. Any development will have a negative effect on the quality and quantity of allotment provision on the site and in Tilehurst generally. The proposed allocation does not acknowledge the fact that the area provides part of a green wildlife corridor linking other major habitat areas such as Mclloy Park, Blundels copse, Newbury Park and the Thames corridor and should be protected as such. The allocation will destroy the existing established wildlife habitat including deer, fox, hedgehog and badger without having 1 st assessed the potential impact. The sites could both be classed as greenfield land and should be protected as such. The allocation does not take account of recent	<p>No change proposed</p> <p>In terms of the principle of the allocation, there is a very significant need for new housing of 699 dwellings per annum, and the Council must consider the contribution that a variety of sites, including such greenfield sites can make to addressing this issue. There are no in-use allotments within the identified sites, nor do they form particularly functional open space.</p> <p>The two sites WR3s and WR3t were considered as part of the same wider site in the Housing and Economic Land Availability Assessment, are in the same ownership, and have been part of the same consideration throughout the process.</p> <p>The policy ensures that biodiversity is taken into account in any proposals. The part of the land of greatest wildlife significance is the Withies copse, and this is preserved and protected in the Local</p>

		<p>additional infill developments both in proximity to the site and with other residential site allocations in the Tilehurst area including those on the borders within West Berkshire. The ability of the topography of the sites to deliver up to 80 dwellings has not been considered. Alternative Local Plan site allocations and overall housing supply targets within the town need to be given balanced and reasoned consideration when considering sites WR3t and WR3s and other infill or brownfield opportunities. The cumulative impact of the allocation has a detrimental effect on the wellbeing of local residents resulting from but not exclusively:</p> <ul style="list-style-type: none"> • Loss of open space • Loss of local visual amenity from neighbouring streets • Loss of strategic visual amenity over the Thames Valley • Increased pressure on existing and decreasing green space • Damage to established wildlife habitat • Loss of environmental • Increased pressure on local and public services and facilities including schools and health • Increased pressure on the existing inadequate road network both in terms of additional traffic volume and on street parking • Additional noise and light pollution • A detrimental effect on the historic and rural setting of aspects of Armour Hill and Kentwood Hill. <p>There is further risk that the allocation will put pressure on other similar existing land to be allocated for housing. Site WR3t Armour Hill should be allocated as a protected as a protected as an area of wildlife habitat/open space and allotment use to ensure a mixed, balanced and sustainable neighbourhood environment. The extent of the allocation of Site WR3s Kentwood Hill should be reduced to the previous allocation of the Kentwood Hill commercial use only and the remainder of the site protected in accordance with site WR3t. I would like to appear in person at the examination.</p>	<p>Plan, together with green links linking it into the wider Green Network.</p> <p>The policy also ensures that any development should assess and mitigate any impacts on the Armour Hill/Kentwood Hill and Kentwood Hill/Norcot Road/School Road junctions. Transport Modelling for the Local Plan did not show that the immediate surrounding roads would be over capacity.</p> <p>The policy also requires retention of a landscaped border to Armour Hill and Kentwood Hill, as well as recognition of the need to retain the view across the Thames Valley to the Chiltern escarpment.</p> <p>Duty to co-operate matters are dealt with in full in the Duty to Co-operate Statement.</p>
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<p>Bell Tower Community Association</p>	<p>WR4: Potential Traveller Transit Site at Cow Lane</p>	<p>In its vision statement in 2.1.5 the Council says it sees Reading as “a City of rivers and parks” with the example of the Thames between the Caversham and Reading Bridges. However, moving West from the Caversham Bridge, the presence of travellers’ site might deter residents from using the Thames Path. This might also impinge on the priority in 2.1.7 of keeping the town green, safe and active and the core strategy outlined in 2.1.8 which says: “Green areas throughout the town, including watercourses, woodlands and open green space will be protected and enhanced and linked together as a recreational and ecological resource.” The location of Wr4 on the flood plain also calls the site into question and contradicts CC3 that developments should incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change. This is particularly relevant given central government guidelines on travellers’ sites and flood plains in the light of caravans’ vulnerability to flooding. The impact on the use of the site as a travellers' camp on the flood risk would also need to be assessed according to 4.2.98. The rise in reporting when travellers unofficially set up a camp on this site in Nov 2017 means the development will fail to safeguard amenity and not have a detrimental impact on crime and safety according to CC8. At this time, 39 crimes were reported according to TVP. That compares with 7 in both Oct 2017 and Nov 2016. The site is also likely to cause detriment to outlook, contradicting CC8, as well as counter policy EN5 on protecting significant views (1 & 3) as shown by figure 4.2 and be in contravention of H13 iv. The use of WR4 for a travellers’ site also runs counter to most of the provisions in policy EN11 on waterspaces. Proximity to the Thames would also mean the Council would have to ensure the site did not have a detrimental effect under EN16 and under 4.2.91 on the provision of appropriate sewerage outlets. WR4 is also close to core employment area EM2g. The location of the travellers’ site is likely to deter businesses from using parts or all of it, resulting in a loss of employment land (EM3). Also, WR4 states that it should not have significant adverse effects on existing operations, in particular Reading Festival, which</p>	<p>No change proposed.</p> <p>The full results of consultation still need to be reported to Policy Committee and a decision made on whether or not to proceed with the site. This is expected to happen later in 2018. The proposed policy WR4 in the Local Plan is intended to reflect that this represents a potential site, which is in the process of being considered, and flags up the main issues.</p> <p>It is recognised that there are issues which are still to be resolved in full. Impact on nearby uses, including Reading Festival, and on access to waterways are matters which will still require full investigation as part of taking a proposal forward.</p> <p>In terms of the flood risk, the site has been through the Sequential Test and is considered to have complied with the requirements of the NPPF.</p> <p>The site is capable of landscaping so that there is no visual effect, including on views from distance under EN5. This is a mixed commercial area in any case, and it is unlikely that a site would significantly detract from the overall impression. Policy CC8 refers to impact on residential amenity, but this site is some way distant from residential properties, far more so than most other sites that were assessed.</p>
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		seems unlikely. Any detrimental effect on the festival would run contrary to the core strategy outlined in 2.1.8 of Reading's role as a centre for arts and culture expanding.	
Bracknell Forest Borough Council	WR4: Potential Traveller Transit Site at Cow Lane	Bracknell Forest Council is supportive of Policy WR4 'Potential Traveller Transit site at Cow Lane' to help address the increase in unauthorised encampments in and around Reading. It is noted that there are potential conflicts with existing commercial operations that could be affected, including the fact the site is currently used as part of the annual Reading Festival. For information, Bracknell Forest Council has also commissioned consultants to carry out an up to date assessment of needs. The Council is still considering the results of the study, which includes a requirement for permanent pitches and a transit site as part of a strategic cross-boundary solution.	Noted. No change needed.
Environment Agency	Policy WR4	WR4: The site boundary for this site allocation is in FZ3. Table 2 of the National Planning Practice Guidance classifies caravans, mobile homes and park homes intended for permanent residential use as 'highly vulnerable' and Table 3 shows that this vulnerability would not be compatible with Flood Zone 3. We advised in our consultation response to the Reading Borough Gypsy and Traveller, Travelling Showperson and Houseboat Dweller Accommodation Assessment 2017 on 06 Nov 2017 that this site is redrawn to exclude all areas of Flood Zone 3. This has not been done. We recommend that the site boundary is redrawn, otherwise we would object to the planning application for this site as it would be contrary to the NPPF. If this site is redrawn so that the site lies wholly within FZ2, then the exception test is required in accordance with table 3 of the NPPF. The flood risk for this site has not been assessed in the level 2 SFRA and therefore it has not been shown that it has passed the exception test. We suggest that the flood risk for this site is assessed in the level 2 SFRA and if part 2 of the exception test can be passed, suitable flood risk mitigation measures are incorporated into the site specific policy.	Partly agreed. Change proposed. It is recognised that there is a small portion of the site within Flood Zone 3, and that this should not be used for caravans in accordance with national policy. However, these elements need to stay within the site boundary, as the boundary will need to include access, landscaping, and removal of every part of Flood Zone 3 would result in an illogical site boundary. Instead, WR4 should be amended to rule out caravans in Flood Zone 3. SFRA Level 2 has been carried out for the site, and the conclusion was that it could be developed safely, subject to various policy recommendations.
Festival Republic Limited	WR4: Potential Traveller Transit	Festival Republic are strongly opposed to the proposed identification of land at Cow Lane for a traveller transit site. Our clients were extremely	No change proposed.

	<p>Site at Cow Lane</p>	<p>disappointed to note that notwithstanding the representations made on their behalf on 16 October 2017 regarding the gypsy and traveller consultation document the Borough Council has proposed the policy in the most recent iteration of the Local Plan. A copy of those representations which still stand is attached. Paragraph 2.3 of the Consultation Document indicates that if following the consultation the site is “considered suitable for transit provision” in “would potentially” be included in the Pre-Submission Draft Local. There has been no indication of any evaluation of the consultation responses and (particularly in the light of our client’s representations) no justification for the inclusion of the proposed policy has been given.</p> <p>General – It is of course noted that the policy as drafted makes it clear that: “any proposed development for transit accommodation should: Not have any significant adverse effects on existing operations in particular the Reading Festival...” The acknowledgement of the importance of Reading Festival in paragraph 7.3.21 is welcomed. It is appreciated that the Borough Council recognises that the Festival is a “major asset” and that any proposal must “ensure that the ability of the Festival to operate will not be threatened” but Festival Republic’s position is that that cannot in practice be achieved. There will inevitably be “significant adverse effects” on the operation of the Reading Festival. The reality is that if Cow Lane becomes a transit site the Festival cannot take place. The site at Cow Lane should not therefore be allocated.</p> <p>Reasons –</p> <ul style="list-style-type: none"> • The site is part of the centre of operations for the entirety of the Festival organisation throughout the 6-8 weeks when the festival site is being prepared then taken down. • The access to the site (the Blue Gate – at the south end of Cow Lane) is the main access for all supplies and construction materials. It is the only access suitable for high vehicles which are required for construction purposes. It is essential that the 	<p>The full results of consultation still need to be reported to Policy Committee and a decision made on whether or not to proceed with the site. As such, the representations made will be dealt with in full at that point. This is expected to happen later in 2018. The proposed policy WR4 in the Local Plan is intended to reflect that this represents a potential site, which is in the process of being considered, and flags up the main issues.</p> <p>As stated within policy WR4, the policy will not enable any development which puts the operation of Reading Festival at risk. The importance of the Festival to the town’s economy and cultural role is not to be underestimated. What needs to be investigated in full before any decision is made is the extent to which provision of a transit site in this location renders the Festival inoperable, including whether this might mean a transit site not being available for the time of the Festival operations. After full investigation, it is possible that this may result in the proposals not being taken forward.</p> <p>It is not agreed that the issues raised in relation to the other 80 sites are based on a cursory examination, nor that they can be easily mitigated. In the case of visual amenity for instance, most of the sites excluded on this basis are pieces of amenity land directly in front of residential properties, often at road junctions, and are very different to the Cow Lane site.</p>
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		<p>Festival has absolute control of the Blue Gate from the start to the finish of the 6-8 week period.</p> <ul style="list-style-type: none"> • The main stage is on land owned by Festival Republic immediately to the west of the footpath in Cow Lane. Behind the stage is the backstage area and where portable cabins used as offices throughout the festival are located. Immediately across Cow Lane to the east is the proposed site area. For many years this area has been used for security, counter terrorism checks, catering, broadcasting and other communications and emergency vehicles. • The northern strip of the proposed site adjacent to the existing ditch is used as a direct exit route from the arena onto Richfield Avenue for up to 20,000 day visitors. • For the smooth operation of the Festival organisers need absolute control of the areas in which they operate. A transit site in the heart of the operation would deny the operators, the police and other services the necessary control and compromise any counter-terrorism checking that currently takes place at the entry point. <p>The site is required for 6-8 weeks from the end of July to the beginning of September. There are three main vehicle access points to the main Festival site, Blue Gate, Orange Gate and Yellow Gate. Blue gate is the only access which is in practice suitable for use by high vehicles. It is directly off Richfield Avenue and is the only appropriate access for production and artist arrivals and for setting up and closing down as well as supplies during the whole 6-8 week period. Further the Blue Gate provides the best available access to the whole of the festival complex. As the Borough Council is aware, the event has capacity (and licence) for 99,999 people (for the 2018 event). The main stage is located in the optimum position to accommodate festival goers and manage noise. The core of the operation needs to be proximate to the backstage area and offices. The area has been used over a number of years for various administrative requirements including security control, counter-</p>	<p>In terms of the flood risk, the site has been through the Sequential Test and is considered to have complied with the requirements of the NPPF.</p>
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		<p>terrorism checking of personnel (those employed at the site and others as necessary) communications (the BBC has its own compound within the site) other organisations and catering for personnel/staff working on the site. The chosen site therefore functions as part of the nerve centre of the whole festival operation. The strip of land immediately to the south of ditch and within the identified site is used to enable safe and speedy egress from arena through the site for day visitors heading back into Reading and/or to the main railway station. It is not used for access but enables visitors to leave the arena as swiftly as practicable directly onto Richfield Avenue and to follow the public highways network from there. The route has been agreed with the Borough Council and the police who arrange for the road to be closed to facilitate egress for such visitors. Attached to this representation is an area photo demonstrating something of the strategic location and impact of the proposed site and a plan which has been prepared to illustrate the proximity of actual uses undertaken on the potential site to the stage and backstage areas. Over the years the Reading Festival organisers have worked hard to agree and to refine practical arrangements for the various operations with the Borough Council, the police, emergency services, suppliers, broadcasters as well of course as visitors to the Festival itself. The allocation of the heart of the operation for another use would seriously disrupt the existing arrangements which are known to and accepted by key stakeholders. Such disruption would endanger the smooth running of the event. As will be apparent and is already known to the Borough Council, the organisers of the festival need to have control of the whole of the festival site. It is inconsistent with the need for control for a third party to be in the middle of the operations. The organisers would of course have no control over any third party which would have rights of access and egress conflicting with the needs of the festival.</p> <p>Possible alternative sites – Paragraph 7.3.20 of the pre-submission draft asserts that the Cow Lane site “is considered to be the only location in Reading where transit needs could be potentially met.” That is with</p>	
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		<p>respect an extreme proposition. Our clients made representations on the Gypsy and Traveller Consultation Document (Sept 2017). That document identified 80 or so sites owned by the Council that were considered. At the end of Annex 1 of the consultation document there is the comment: “The reasons for rejections set out above are not necessarily the only reason why a particular site is considered unsuitable. Once a site had been excluded for robust reasons, there was not considered to be any need to identify further issues.” A number of sites are rejected on the basis of visual amenity. Others are rejected on the basis that the land is required for other use – e.g. continued use as a car park. There is no evidence of why the various reasons are considered “robust.” In particular there are a number of parcels of land where the only reason is “visual amenity” but nothing to demonstrate the robustness of the assertion. The final bullet point in draft policy WR4 requires “a strong landscape buffer.” Landscaping is anticipated. It must be possible to make appropriate landscaping provision even where in the case of other possible sites there may be a potential adverse impact on visual amenity. There are a number of sites – e.g. within the South Reading area – that could be reconsidered if it is considered that provision must be made for a travellers’ transit site within the Borough.</p> <p>Reading Festival and its Importance to Reading – The recognition of the importance of the Festival to Reading as a “major asset to the town” is welcomed. As indicated in Festival Republic’s response to the consultation draft the most recent economic impact assessment indicated that the festival generates approximately £20 million into the local economy with a further £20 million into the wider UK economy. It is therefore a major economic driver. Reading has become well known internationally for the Festival and in some parts of the world Reading is known more for its Festival than for any of its other significant achievements. The objective contained within the draft policy itself that the proposed development should “not have any significant adverse effects on the existing operations (in particular the Reading Festival)</p>	
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		cannot be achieved. It is either the transit site or the Festival. The allocation of the site should be rejected.	
H&T Properties Ltd	WR4: Potential Traveller Transit Site at Cow Lane	<p>We do not consider the plan to be sound. Policy WR4 should be removed. We would like to appear in person at the examination. We were extremely disappointed to note the proposed policy in the most recent iteration of the Plan despite representations made in October regarding the Gypsy and Traveller Consultation. No response, summary or assessment of the September Consultation Responses have been provided or reported to our client or issued on the Council's website. It is not clear how the Council has reached this conclusion. Given the time frame, it seems the allocation has been pushed through with haste and without consideration of significant issues that make the site unsuitable. Moreover, it appears that the Council have not properly and fully assessed the alternative sites (of which there are more than 80). Many appear to have been summarily dismissed for reasons that could be mitigated. The issues facing this proposed site cannot be so easily mitigated and put at risk one of the town's biggest economic drivers.</p> <p>Flood risk – The site itself if located within Flood Zone 2 and directly adjoins an area of land within Flood Zone 3. In applying the sequential test preference should be given to land that is located in Flood Zone 1 and if no reasonably available alternative is available for the type of development proposed, only then should consideration be given to locating development within Flood Zone 2 (and then Flood Zone 3). Caravans are also considered within the Technical Guidance to the NPPF as being highly vulnerable. It is clear from the Gypsy and Traveller Consultation Document that there are other reasonably available sites in Flood Zone 1 which have been disregarded for issues such as landscaping, which is easily mitigated. It is also material that the change of use of the Site to that of a transit site will increase risk of flood risk in and around the area as well as increase the risk to life and property.</p> <p>Highway Access – The Site is located on land at the junction of Cow Lane</p>	<p>No change proposed.</p> <p>The full results of consultation still need to be reported to Policy Committee and a decision made on whether or not to proceed with the site. As such, the representations made will be dealt with in full at that point. This is expected to happen later in 2018. The proposed policy WR4 in the Local Plan is intended to reflect that this represents a potential site, which is in the process of being considered, and flags up the main issues.</p> <p>It is not agreed that the issues raised in relation to the other 80 sites are based on a cursory examination, nor that they can be easily mitigated. In the case of visual amenity for instance, most of the sites excluded on this basis are pieces of amenity land directly in front of residential properties, often at road junctions, and are very different to the Cow Lane site.</p> <p>In terms of the flood risk, the site has been through the Sequential Test and is considered to have complied with the requirements of the NPPF. No sites have been excluded for reasons of 'landscaping'. Landscape significance, which is a very different matter and much more difficult to mitigate, is mentioned, but no sites are excluded purely on this basis in any case.</p>

		<p>and Richfield Avenue with vehicle access proposed off Cow Lane. Cow Lane is a very busy road and positioning a gypsy traveller site adjacent to a busy road should not be considered practicable or appropriate. We are concerned that there will be a substantial increase in the vehicular use of the junction which will exacerbate highway problems. The movement of vehicles towing either caravans or trailers especially during rush hours and would be highly hazardous and would cause serious harm to the free flow of traffic and highway safety in the locality. We are concerned there will not be adequate visibility for vehicles exiting and entering the Site since it is located on a wide bend. The Council is clear that they wish to maintain Richfield Avenue as a Core Employment Area (EM2g on the Proposals Map). This policy states that employment development should be in highly accessible locations. The allocation of the site for a non-employment use would have a detrimental effect of the economic role of the area by negatively impacting the highway network and would contradict the purpose of the Council's proposed Employment policies. Locating the proposed transit site on land where the negative impacts such as on landscape amenity would ensure that the inherent conflict within the Local Plan is avoided.</p> <p>Impact of the use of land in the surrounding area – The area to the south of the site is surrounded by industrial, leisure and agricultural uses. We have offices currently based on Cardiff Road which is in close proximity to the Site. On the western side of the Site is a vast amount of open space which Reading Festival takes place every year. It is contended that a transit site at this location is incompatible with nearby land uses. In particular, Reading Festival is a major economic driver for the local area and the site is required for around 6-8 weeks from the end of July to September. It is difficult to envisage how a traveller site would be sustainable having a major adverse impact on the Festival. A transit site would be better situated in a location closer to residential areas. The current location is isolated from the settled community and the physical separation may lead to non-integration, physical isolation and a</p>	<p>It is recognised that there are issues which are still to be resolved in full. Access, impact on nearby uses, is a matter which will still require full investigation as part of taking a proposal forward.</p>
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		<p>rise in anti-social behaviour offenses.</p> <p>Possible Alternative Sites – Paragraph 7.3.20 of the pre-submission draft asserts that the Cow Lane site “is considered to be the only location in Reading where transit need could potentially be met.” That is with respect an extreme proposition. A number of sites are rejected on the basis of visual amenity. Others are rejected on the basis that the land is required for other use – e.g. continued use as a car park. There is no evidence of why the various reasons are considered “robust.” In particular, there are a number of parcels of land where the only reason is “visual amenity” but nothing to demonstrate the robustness of the assertion. The final bullet point requires a “strong landscape buffer.” Landscaping is anticipated. It must be possible to make appropriate landscaping provision even where in the case of other possible sites there may be potential adverse impact on visual amenity. There are a number of sites (e.g. within the South Reading area) that could be reconsidered for a travellers’ transit site within the Borough.</p>	
Pang Valley Group of the Ramblers’ Association	Policy WR4	<p>WR4 - Public Footpath Reading 17 is a designated public footpath and as such access is limited by Section 34 of the Roads Traffic Act 1988 to pedestrian use only. In my submission to the consultation exercise in October 2017 I pointed out that the designation of Cow Lane as a dedicated footpath meant that access to this site cannot be obtained legally by motor vehicle. I suggested that an alternative access should be used either from Richfield Avenue itself or along the back of the former Leaderboard Golf Driving Range. I am pleased to see that any existing Rights of Way are to be protected by the wording highlighted above in the sub-paragraphs to Policy WR4 but nevertheless register an objection because the heading of the Policy suggests that access will be from Cow Lane. The identification of Cow Lane as a Gypsy and Traveller site is premature given there are many difficulties to be overcome with access and that it clashes with the pop festival use. Accordingly the heading of Policy WR4 and the wording of the justification paragraphs should be amended to reflect that the Borough Council have identified a potential</p>	<p>No change proposed.</p> <p>It is recognised that there is still a considerable amount of work to do on deciding on whether to move forward with the site and drawing up specific proposals. The access to the site is something that will need to be further considered, and, as pointed out, the policy ensures that there should be no detrimental effects on the right of way. The title of the policy does not indicate the access point, and there are other allocated sites listed as being on roads that they would not ultimately be accessed from (see e.g. rear of 303-315 Oxford Road). This is just a title to locate the site.</p>

		site but difficulties with access and use have to be resolved. Any reference to access from Cow Lane should be removed from the Policy heading since that is aspirational.	The policy and supporting text already indicate that there are matters which remain to be resolved, including the impact on the Festival. This will be assessed later in 2018.
Robert Collard Ltd	WR4: Potential Traveller Transit Site at Cow Lane	R Collard Ltd are strongly opposed to the proposed location of land at Cow Lane for a traveller transit site. Our client has recently acquired premises in the Richfield Avenue Economic Area. Our client notes that the previous drafts of the Local Plan made no mention of an allocation of a transit site within the Reading Borough, and Policy WR4 has only been included in the latest, pre-submission draft. This has meant that the normal process of allowing the public the opportunity to comment on draft policies of the Local Plan, when taken as a whole, has not been provided in respect of Policy WR4. Instead it has simply been summarily inserted in the pre-submission draft issued on 30 November 2017. Our client understands that the Council did run a consultation in September 2017 regarding Gypsy and Traveller sites. However this consultation only closed on the 24 October 2017, leaving just over 4 weeks between the closure of the consultation and the insertion of the new proposed policy into the pre-submission draft. Our client does appreciate that the Council has a duty to try and provide suitable sites where there is a need for them, and our client understands that the Council is limited to allocating a site from land within its ownership as no privately owned sites were submitted for the location of Gypsy and Traveller sites during the Call for Sites process. However, the Council asserts that out of 80 potential sites only 1 site within its ownership has been identified which could potentially meet transit needs. The method upon which the Council has reached this conclusion is unclear. Although the September Consultation document referred to the site assessment process as a background paper to inform the consultation, the detail of the site assessment process lacked substance. At the end of Annex 1 of the consultation document there is the comment: “the reasons for rejections set out above are not necessarily the only reason why a particular site is considered unsuitable. Once a site had been excluded	<p>No change proposed.</p> <p>It is accepted that the policy was not included within the Draft Local Plan and there was therefore no opportunity to comment on it at that stage. However, the entire Draft Local Plan consultation was not a statutory requirement, as the Council could have proceeded from Issues and Options directly to Pre-Submission, so it is not agreed that this renders the plan unsound. In terms of the Gypsy and Traveller Provision consultation, the four week timescale is not considered to have been unreasonable. The public was afforded the opportunity to comment on the site assessment, including whether or not it was robust.</p> <p>It is not agreed that the issues raised in relation to the other 80 sites are based on a cursory examination, nor that they can be easily mitigated. In the case of visual amenity for instance, most of the sites excluded on this basis are pieces of amenity land directly in front of residential properties, often at road junctions, and are very different to the Cow Lane site. Reasons such as the need for continued use as a car park are largely self-explanatory. It is not necessarily comparable to temporary uses such as the Festival, when the Council needs to</p>

	<p>for robust reasons there was not considered to be any need to identify further issues”. However, examination of the site assessment process lacks sufficient detail to inform the public on how and why certain reasons were considered ‘robust’ and others were not. In particular sites are rejected on the basis that the land is required for other use – e.g. continued use as a car park. There is no evidence of why these are reasons are considered “robust” whereas the fact that the proposed site is required for the use of Reading Festival, one of the major contributors to the local (and UK) economy, has resulted in allocation. Furthermore, there are a number of parcels of land where the only apparent reason for rejection is “visual amenity” but there is nothing to demonstrate the robustness of this assertion or how this conclusion has been reached. Whilst this visual amenity is a valid concern, it is often possible to mitigate this impact. Indeed the final bullet point in draft policy WR4 requires “a strong landscape buffer”. It is clear that landscaping is anticipated and therefore why would it not be possible to make appropriate landscaping provisions in a number of alternative sites. This surely must be a more sensible approach than allocating a site that would result in an inherent conflict with a number of other draft policies within the Local Plan.</p> <p>It is considered that the decision of the Council to simply consult on the proposed allocation of one site, without giving the public the opportunity to comment on the site assessment procedure or even the necessary information to understand and consider the basis of that assessment is flawed. There are a number of legitimate and significant issues and reasons as to why the allocation of this site is unsuitable. These reasons should be weighed in the balance against the other available site options and the potential mitigation measures that would be available to turn one site that on the face of it appear unsuitable in planning terms to a site that is suitable. In respect of the proposed site the issues cannot be easily mitigated. The allocation of this site puts at risk on of the town’s biggest economic drivers, the Reading Festival, and a number of significant businesses who contribute heavily to the</p>	<p>consider the extent to which the functions of the Festival site can only be accommodated in this location.</p> <p>It is recognised that there are issues which are still to be resolved in full. Access, impact on nearby uses, is a matter which will still require full investigation as part of taking a proposal forward, as will the true extent of impact upon the Reading Festival.</p>
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		<p>economic success of the Thames Valley. The Council themselves recognise this contribution, and they are clear that they wish to maintain Richfield Avenue as a Core Employment Area (EM2g on the Proposals Map). The proposed Employment policies clearly states that Employment development for industrial, storage and distribution should be located in highly accessible locations. Cow Lane is an extremely busy road which suffers from a high degree of congestion, especially during the rush hours in the morning and evening. The current highway infrastructure of this area of Reading is inadequate to deal with the greater strain of increased vehicular movement that will be added through the provision of the Site and also be able to support the expansion and development of the economic area as envisioned by the other policies submitted in the draft local plan. The allocation of the proposed site for non-Employment use therefore represents an inherent conflict with the other policies of the Local Plan, something that cannot be easily mitigated against. In light of the above, our client strongly believes that the proposal for the Site to be situated in this location will be incongruous with the surrounding uses. The allocation of the Site will have a detrimental impact on the local highway network which supports one of the Readings key economic areas, not to mention the direct impact on the Reading Festival. An alternative site that where the negative planning issues can be properly mitigated against should be considered. In light of the reasons above, our client does not consider that the Local Plan is sound in respect of Policy WR4. In particular, our client does not consider that the Policy WR4 is justified. Due to the lack of information regarding proposed Policy WR4 the Council have not demonstrated that the proposed policy has been weighed against the reasonable alternatives available to the Council nor that their conclusions are based on proportionate evidence. Policy WR4 should be amended so that the Council is not allocating a specific site to locate the transit site on. This will allow these issues to be robustly assessed in a proper manner.</p>	
Thames	Policy WR4	WR4: Potential Traveller Site at Cow Lane – It is understood that the	No change proposed.

<p>Properties Limited</p>		<p>proposed allocation of site WR4 at Cow Lane has arisen from the updated GTAA – which identified a need for 10-17 permanent pitches and a transit site of 5 pitches – and the Council’s conclusion that it is the only site in the Borough within the Council’s ownership that has some potential to accommodate the transit site requirement. The subtext to Policy WR4 notes that there are existing commercial operations that could be affected by the allocation of the site for transit pitches and more detailed consideration of the site’s potential is required (paragraphs 7.3.20-21). If this is the case, the site should not be proposed for allocation in the emerging Local Plan without the evidence to support that it is suitable and available, and will not have a detrimental impact on existing commercial uses. H13 (provision for gypsies and travellers) sets out at criteria vi) that proposals for new sites for gypsies and travellers should “Be located in line with national and local policy on flood risk, and not involve location of caravans in Flood Zone 3.” The EA’s flood mapping illustrates that the site is covered by Flood Zones 2 and 3, with the highest risk areas covering the northern, southern and the western edges of the site. It is therefore questionable whether dry access into the site from Cow Lane can be achieved. It is also unclear whether there is sufficient space within the Flood Zone 2 areas of the site to accommodate the 5 pitches requires without encroaching into the higher risk area in Zone 3. The National Planning Policy Framework (NPPF) advises at paragraph 100 that ‘Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk’ and that ‘Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property.’ A sequential test is therefore required to determine whether there are more suitable sites available within lower risk areas (Flood Zone 1) in the Borough. It is not clear whether this exercise has been undertaken in the Council reaching the conclusion that this is the only site with potential to accommodate the need. Thames Properties would</p>	<p>The full results of consultation still need to be reported to Policy Committee and a decision made on whether or not to proceed with the site. This is expected to happen later in 2018. The proposed policy WR4 in the Local Plan is intended to reflect that this represents a potential site, which is in the process of being considered, and flags up the main issues.</p> <p>In terms of the flood risk, the site has been through the Sequential Test and is considered to have complied with the requirements of the NPPF. There is sufficient space within Flood Zone 2 to accommodate the transit needs, and there is a proposed change to address this issue.</p>
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		therefore argue that the proposed allocation of site WR4 is unjustified and lack sufficient evidence to justify its inclusion in the Local Plan.	
Thamman, Vijay	WR4: Potential Traveller Transit Site at Cow Lane	<p>We wish to express our concern at the potential allocation of the above Site for a Gypsy and Traveller Transit Site and object in the strongest possible terms to the inclusion of this land in the Local Plan. We understand that the current proposal is for 5 pitches to be located on the Site, along with supporting facilities. We understand that the Council is required as a matter of law to assess the need for all types of housing as part of their Local Plan process, but this requirement does not extend to the allocate sites to deal with that need that are unsuitable for the purpose. The Council has a duty to properly assess the planning merits of any allocation of land, including flood risk, the impact on the neighbouring properties, the character of the area as well as the impact on the surrounding road network and viability of the area. As such, there are a number of significant issues with the Council's proposal. The Council has lighted above the option of allocating of transit site as a way of reducing the number of unauthorised encampments in and around Reading. This logic is flawed. There are a number of transit sites in the neighbouring authorities which are now used as permanent pitches. The creation of a transit site results in the proliferation of unauthorised pitches in the immediately surrounding area to the Site. Adjacent to the above Site is a large area of open space which currently hosts the annual Reading Festival. The creation of an enclave within Reading for businesses in and around Richfield Avenue/Cow Lane has been a deliberate strategic policy of the Council for a number of years and we have a number of tenanted properties in this area. The introduction of a Transit Site does not fit within that strategic policy and does not fit within the character of the area. The Reading Festival and these businesses generate a significant amount of business for the local economy. It does not appear that any thought has been given into the potential impact that the allocation of a Transit Site would have upon these businesses. Indeed recently this site has been used as an unauthorised encampment and there has been considerable impact of</p>	<p>No change proposed.</p> <p>The full results of consultation still need to be reported to Policy Committee and a decision made on whether or not to proceed with the site. As such, the representations made will be dealt with in full at that point. This is expected to happen later in 2018. The proposed policy WR4 in the Local Plan is intended to reflect that this represents a potential site, which is in the process of being considered, and flags up the main issues.</p> <p>The impact on nearby areas including business remains to be fully investigated. However, it should be noted that it is quite common across the UK for traveller sites to be located in close proximity to commercial and industrial areas.</p> <p>The Council is not aware of any authorised transit sites in neighbouring authorities that are now used as permanent provision. It is also not agreed that the provision of a properly managed transit site would increase the amount of spend in removing unauthorised encampments, and we believe the opposite to be true.</p> <p>It is not agreed that the issues raised in relation to the other 80 sites are based on a cursory examination, nor that they can be easily mitigated.</p>

		<p>those businesses already. Something that the police are aware of. As such there is a very high risk that the unauthorised encampments on this land would have a significant and highly detrimental impact on the economy of Reading as a whole. Moreover, the allocation of a transit site in the above location is likely to increase the amount of spending that the Council will have to incur in removing clearing unauthorised encampments. The viability of the proposal is therefore fundamentally flawed on the basis of this location. If the Council is wedded to the idea of providing a transit site within the Borough, then a more suitable site should be sourced. The Council suggests that they have undertaken a thorough assessment of the alternative sites available, but many appear to have been dismissed for less fundamental issues. In short, the allocation of this Site for a Transit Site is ill-thought through and will not address the fundamental issues facing the Council.</p>	
Wokingham Borough Council	Policy WR4	<p>Policy WR4 identifies the potential for a site at Cows Lane to be delivered to accommodate 5 transit pitches. WBC responded to the Sept/Oct consultation on Gypsy and Traveller provision stating that it had no objection to the suitability of this site for transit pitches. However, WBC also stated that consideration should be given to use in part of the site for permanent pitches therefore being a mixed use transit and permanent scheme. This would likely require formal delineation of the transit and permanent elements. No such mixed use is proposed through policy WR4. WBC does not consider this policy in itself to be unsound, given that it proposes to meet the full identified need for transit pitches, but notes that the opportunity to investigate mixed use has not been taken forward to help address permanent Gypsy and Traveller pitch need.</p>	<p>No change proposed. There is not considered to be scope to meet any of the permanent needs on site. The full extent of the area shown is 0.73ha, but this reduces very substantially when taking account of exclusion of parts of the site in Flood Zone 3, provision of access and necessary landscaping, and is likely to be more than halved, and highly unlikely to be able to accommodate permanent accommodation as well as transit. The Council's priority is provision of transit facilities, as it directly addresses the issues that the Council faces on a regular basis with unauthorised encampments.</p>
Environment Agency	Section 8: Caversham and Emmer Green	<p>Strategy for Caversham and Emmer Green: Mention is made of the potential for development involving residential gardens. This is at odds with paragraph 4.2.60 in support of policy EN12, which stresses the importance of "well vegetated gardens" as green links through the Borough.</p>	<p>No change proposed. There is not considered to be a conflict in all cases. Some garden sites are not particularly well-vegetated. The realities of the housing need in Reading are that there will continue to need to be some use of residential gardens, and areas such as Caversham, with its</p>

			large gardens, are likely to continue to see this development.
Hermes Property Unit Trust	Section 8: Caversham and Emmer Green	Section 8 (Caversham and Emmer Green) – We are supportive of the objectives set out at paragraph 8.2.1 and further note that paragraph 8.2.3 references the potential for additional town centre uses in and around central Caversham. We feel, however, that reference should be made to the opportunities for further residential development within the District Centre to assist in meeting the housing requirement for the area over the plan period. We also support the reference to the extant permission at paragraph 8.3.5 alongside reference to ‘any future applications on these sites will be acceptable where they are substantially the same as the existing permission.’ The supporting text advises that the permission establishes the principle of development in this location and therefore an allocation is not required. As such, the permission allows for retail, leisure and residential on site.	Noted. There is not any significant known potential for additional residential development over and above existing permissions, although there may be small-scale opportunities. It is not therefore considered appropriate to reference additional potential here.
Leeke, Veronica	Section 8: Caversham and Emmer Green	I consider the plan to be legally compliant, sound and fulfils the duty to co-operate. I would like to endorse the following 2 paragraphs of section 8, which emphasises the importance of the surrounding Chilterns AONB in the character of the area of Emmer Green: 8.2.4 The relationship of the landscape with the Chiltern Hills and River Thames, described in paragraph 8.1.6, and of the townscape with the former separate settlements of Caversham and surrounding hamlets, will be preserved. 8.2.5 The adequacy of infrastructure to support additional development remains one of the most significant concerns in the area. In particular, transport, education and healthcare are issues that would need to be addressed in any development.	Noted. No change needed.
Historic England	Paragraph 8.1.5	Paragraph 8.1.5 - Historic England welcomes paragraph 8.1.5 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Rowe, Dr Simon	Paragraph 8.2.1	Caversham Specific Area Plan: Section 8.2.1 (a) – only mentions ‘pedestrian’ links. How about cycles?	Agreed. Change proposed. This reference should be added.
Historic England	Policy CA1a	Policy CA1a - Historic England welcomes the requirement in Policy CA1a	Noted. No change needed.

		for development to take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	
Sport England	Policy CA1a	CA1a: Reading University Boat Club – Sport England supports this policy but emphasises it is on the proviso that the boat club has been reallocated and is operational prior to the existing site being redeveloped.	Noted. No change needed.
University of Reading	Policy CA1a	<p>The Boat Club – The site is located a short distance to the north of Reading town centre, within Caversham and Emmer Green. Within close proximity to the River Thames, the site is occupied by the University’s Boat Club with two main buildings centrally positioned within the site. A number of services and facilities within Reading town centre are within walking distance. The southern half of the site is located within Flood Zone 3 whilst the northern half of the site is located within Flood Zone 2. Existing buildings and parts of the adjacent residential development are within Flood Zone 3. The Boat Club has been previously promoted in response to the Council’s Issues and Options suggesting an indicative capacity of 15 dwellings at 30 dph on the assumption of the retention of the Boat Club on the site and development only to the northern half of the site.</p> <p>Policy CA1a: The University supports this Policy in general terms, however, considers that the indicative capacity of the site should be increased to 16-40 dwellings. The University does however object to wording included within this Policy which states “Development for residential, subject to relocation of the boat club” and consider the restriction dependent of relocation of the boat club for any residential development to take place to not be justified and therefore an unsound inclusion within the Policy. We suggest bullet point two of the draft Policy be amended to the following: “Take account of the risk of flooding, and locate development only in the portion of the site in Flood Zone 2, closest to Abbotsmead Road,</p>	<p>Partially agreed.</p> <p>Change proposed. The requirement to relocate the boat club should not stand in the way of its loss should the RL6/NPPF requirements be fulfilled, as for any other sports facility. The policy should be amended to reflect this.</p> <p>In terms of flood risk, the requirement to develop only the areas in Flood Zone 2 are a key part of the reason this site has passed the sequential test and can therefore be included in the Local Plan. Whilst there may be technical solutions, this cannot be assumed at this stage, and will have to be considered on their merits at planning application stage and it is not therefore considered that the dwelling range should be increased.</p>

		<p><u>unless it is demonstrated that suitable flood risk mitigation options are available to facilitate the development of a greater proportion of the site.” We had previously advised that if development of the Boat Club site (CA1a) resulted in the need for the redevelopment (or conversion) of the existing Reading Boat Club buildings on the site to the extent the Boat Club could not operate, then the relocation of the club, could be conditional on finding, and demonstrating, that an alternative location has been found. This could then be required within the policy to be secured by Section 106. Should the Council seek to do this, previously suggested wording could be used: “any development that would result in the loss of the Boat Club facilities shall not be approved unless an alternative location for the Boat Club be found and secured by legal agreement, or where it can be demonstrated that there is no longer demand for the facility.”</u></p>	
Ansell, Julian	CA1b: Part of Reading Golf Course, Kidmore End Road	<p>I do not think this policy is legally compliant or fulfils the duty to co-operate.</p> <p>1. The area identified is 3.75 ha providing 90-130 dwellings. At present this is a privately owned open space. The Council has already expressed concerns about air quality in the Reading area and a development such as this would have a significantly detrimental effect on residents. In its response to potential loss of open space the Council stated that the need for housing meant that the obligation for the protection of undeveloped land could not be met. The area concerned is close to the heart of Emmer Green and this response is not considered adequate, the need to ensure the health of residents must be the first consideration.</p> <p>2. An application to South Oxfordshire District Council (SODC) for a development by Gladman Homes of land off Peppard Road for 245 residential dwellings has been comprehensively opposed by the Council and, in the appeal statement dated December 2017, a number of points were raised all of which are also relevant to the proposed inclusion of the land owned by Reading Golf Club:</p> <ul style="list-style-type: none"> • 1.1 ‘an unfortunate precedent for unplanned development 	<p><i>Representations have raised a wide variety of issues in common with this proposal. Rather than repeat responses, the response below identifies the common issues and sets out the Council’s position.</i></p> <p>Need for development: The Council has a very significant need for new homes, both in overall terms and for affordable homes. The Berkshire Strategic Housing Market Assessment has identified a need for 699 new homes, including 406 affordable homes, per year up to 2036. Whilst there are many previously developed sites in Reading which can accommodate development, and indeed the vast majority of new homes in the Local Plan would be on such sites, these are already accounted for and will not be sufficient to meet the identified need. Indeed, even with the inclusion of this part of the</p>

		<p>on the boundary of the Borough with unforeseen detrimental impact on the infrastructure’</p> <ul style="list-style-type: none"> • 1.2 ‘an area where infrastructure is already under severe pressure.’ • 2.4 ‘access across the River Thames within Reading is restricted to 2, single land bridge crossings which operate at full capacity at peak travel times.’ • 2.12 ‘school capacity in the area is very tight and would not support further substantial additional development.’ • 4.6 ‘the capacity of the Peppard Road/Buckingham Drive roundabout junction exceeded capacity following the Arcady assessment...’ • 4.26 ‘Reading Borough have concerns over air quality...’ <p>It is considered disingenuous for the Council to include such statements in its opposition to the Gladman Development but at the same time to ignore them by including the Reading Golf Club land in its own local plan.</p> <p>3. The responses by the Council to the points raised in opposition to the inclusion of the Reading Golf Club land in the Local Plan were inadequate and the Council has failed to set out specific proposals to deal with the problems which they themselves have identified in the points noted under section 2 above.</p> <p>4. At the most recent meeting of the members of Reading Golf Club when the proposal to develop the land owned by the Club was discussed, the members voted overwhelmingly to reject the plan. No open land to replace the lost open land has even been identified as available and a request to SODC to include land owned by the Club in their Strategic Housing and Economic Land Availability policy was turned down in October 2017 as not being in accordance with spatial strategy (SODC SHELAA site 71 details included with this representation). I would like to appear at the examination to present the case for removal of CA1b and to draw attention to the long term effects upon Emmer Green.</p>	<p>golf club site, the Council is in a position where it needs to rely on homes being provided within the rest of the Western Berkshire HMA.</p> <p>Loss of open space: In terms of loss of open space, the site is not accessible other than to members, contains no designations other than protected trees (which can be retained in any development), and this part of the course is not particularly visible from public areas. Preservation of all undeveloped land in Reading is not possible in view of the high level of need for new housing,</p> <p>Transport: The Council is aware of concerns around transport infrastructure within the area. Transport Modelling work has been undertaken and does not indicate that this development will have a significant effect on the local road network in terms of pushing roads and junctions over capacity. There is a particular issue with Kidmore End Road, and the policy clarifies that this is to be resolved within any application.</p> <p>Thames Crossing: Crossing of the Thames is identified in TR2, and work on this is progressing.</p> <p>Education: In terms of impacts upon education provision, the Council has identified a need for a new 6FE secondary school within Reading, as well as expansion of some existing schools, and is actively pursuing options for its provision. It is the Council’s understanding that Chiltern Edge</p>
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Bee, Kevin	CA1b: Part of Reading Golf Course, Kidmore End Road	<p>I do not consider the plan to be sound or that it fulfils the duty to co-operate. The plan has not appropriately articulated why there is a need for more houses in the Emmer Green area. Especially in the context of a flat housing market and barely growing economy. The plan provides no solution to the issues with which it raises, i.e.:</p> <ul style="list-style-type: none"> • Take measures to mitigate impacts on the highway network, particularly Kidmore End Road; • Take account of potential archaeological significance; and • Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required. <p>In particular, no solution to the impact on Kidmore End Road has been demonstrated, which in part is only wide enough to allow one car through at a time. Emmer Green Primary School would also be put under extra pressure to provide a safe environment for its pupils whilst using Grove Road to access the school. There is no evidence that the duty to co-operate has been fulfilled. Another concern is the impact to the environment. Reading Golf Club is a very beautiful course and has many very old trees and hedgerows it helps to preserve. What the plan does not seem to consider is the impact of having 130 extra houses on schools and other local services such as healthcare. The area is very attractive to families and the local schools are already oversubscribed. This will be particularly hard for the secondary school provision with a single school, Highdown, having to take extra pupils. The following should be provided:</p> <ul style="list-style-type: none"> • A plan for the roads surrounding its development to ensure a safe environment for pedestrians and road users. • A plan for increasing the provision of places at local schools. • A plan for increasing local healthcare provision such as GPs and dentists. • A plan for safeguarding the local environment. 	<p>School is also to remain open. Further work will also be needed on primary education provision within the Borough, although the needs are less pressing than secondary.</p> <p>Healthcare: There is recognition of the issues around GP surgeries in the area, and the policy requires provision of primary healthcare on site.</p> <p>Loss of open space: In terms of loss of open space, the site is not accessible other than to members, contains no designations other than protected trees (which can be retained in any development), and this part of the course is not particularly visible from public areas. Preservation of all undeveloped land in Reading is not possible in view of the high level of need for new housing,</p> <p>Ecology: The part of the Golf Course identified is not a designated Wildlife Heritage Site/Local Wildlife Site and contains no identified BAP priority habitat. Previous ecology advice has not identified any particular significance.</p> <p>Trees: There are a limited number of TPOs on site, which can be worked around.</p> <p>SANG: Suitable Alternative Natural Greenspace relates to European designated Special Protection Areas, and is not applicable here.</p> <p>Health and safety/residential amenity: It is</p>
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Bingley, Patrick	CA1b: Part of Reading Golf Course, Kidmore End Road	<p>I am writing to raise my concerns about this proposed build. There are not enough school or doctor's places. You'll already be aware that the road system can't handle the amount of existing car users either. If new housing must be found, then please convert the multiple new empty office blocks in Reading town centre.</p>	<p>Loss of leisure: The proposal set out in the plan will retain the golf club, and provide a new clubhouse.</p>
Bishop, Rob	CA1b: Part of Reading Golf Course, Kidmore End Road	<p>I do not consider the Local Plan in respect to site CA1b is sound because:</p> <ul style="list-style-type: none"> • The proposed development will create extra road traffic (around 200 cars), most of which will exit the proposed development to Kidmore End Land to get to the B481 Peppard Rd. Kidmore End Ln is effectively a one way road alongside the Emmer Green recreation ground and this extra traffic will only serve to make it a bottleneck. Once on the B481, most cars will head towards Reading town centre, causing tailbacks to the Esso garage. It also causes cars to illegally cut through our private road (Grosvenor Rd) causing a queue to enter Henley Road. I moved here because it was quiet and I pay for the upkeep of the road. The extra traffic increases my maintenance costs, destroys its quiet nature and subjects me and my neighbours to abuse from drivers when we try to stop it. • Without a third Thames Bridge, the proposed development will exacerbate the existing traffic problems. No new schemes north of the river should be approved until this bridge is built. • There is no evidence that the proposed development will provide an upgrade to the existing infrastructure (road, parking, schools, surgeries, etc.). Until there is clear evidence of actual plans (not just a financial contribution), the infrastructure is at risk that it will never be adequate. • The proposed development will adversely affect the "green lung" that the present golf course provides to local residents. 	<p>Air quality: Development will need to mitigate any effects on air quality, or any exposure to poor air quality. This is an issue that affects much of Reading, and will need to be factored into development.</p> <p>Detailed matters: It is not for the Local Plan to fully design out the scheme and undertake all necessary detailed work. Matters such as water and wastewater infrastructure are for a developer in liaison with Thames Water. Detailed solutions for Kidmore End Road will need to be drawn up as part of the development process, as is generally the case.</p> <p>Relationship with Gladman scheme: The proposal is of a smaller scale than the Gladman proposal, and is within the existing urban fabric. Each proposal needs to be considered on its merits.</p> <p>Duty to co-operate: duty to co-operate matters are dealt with in more detail in the Duty to Co-operate Statement. However, SODC has not</p>

		<ul style="list-style-type: none"> • The proposed development puts at risk the ongoing viability of Reading Golf Club, a recreational facility to local residents. It also puts at risk the 100 year history of the Club on this site (a significant heritage in the Reading area). • There are many important trees on the proposed development site (one is a three hundred year old oak tree), some that are protected by TPOs and many that have recently been planted by Reading Golf Club in conjunction with the Woodland Trust. The proposed development scheme puts all of these at risk. <p>I do not wish to appear in person at the public examination.</p>	<p>raised any specific concerns with the Local Plan proposal.</p> <p>Proposal to release the whole golf club for development: No formal proposal for development of the whole golf course has been put forward to the Council for consideration, either for inclusion in the Local Plan or as a planning application. As such, the Council has in no way advocated or endorsed this proposal, nor provided any formal comments to the Golf Club on it. It is not included within the Local Plan for Reading, or for South Oxfordshire. There are clearly a number of significant issues that would need to be taken into account with such a proposal, and it would need to be assessed if and when it is formally submitted to us. It would also require extensive co-operation with South Oxfordshire District Council. This would of course require further consultation, either as part of a local plan or as a planning application.</p>
Calder, Colin	CA1b: Part of Reading Golf Course, Kidmore End Road	<p>I do not consider the policy to be sound or to fulfil the duty to co-operate. Once again we have a set of proposals which are totally lacking in rounded and coordinated thinking. They are driven only by meeting Government targets and show very little thought for the needs of the current community. North of the River Thames through Caversham and Emmer Green, we have a lack of school capacity, lack of doctors and dentist surgeries, lack of transport facilities (bus service cut recently), very poor road/green space/pavement maintenance and a road system that is totally unfit for current needs. More homes at Reading Golf Club are likely to bring at least 200 additional cars, major pressure on local services and traffic chaos during building and after completion. This part of Reading already has very little natural space and the current proposal will destroy a significant part of what we have. The area is a major support to our wildlife. The Club is over 100 years old and is part of the heritage and fabric of the community, used for a number of non-golf meetings. I suggest RBC take a closer look at many empty properties – old office space, empty shops and homes around the town – before destroying land that contributes to achieving cleaner air and reduced pollution. In order to make the plan sound, provide proof that all the requirements of the community are being properly considered in planning matters. I do not wish to appear at the public examination.</p>	
Cushley, Jim	CA1b: Part of Reading Golf	<p>I wish to object to the development on Reading Golf Course, as described in CA1b in the Local Plan. I would like this site to be removed</p>	

	Course	<p>from the Local Plan before it is submitted to the Secretary of State. I think the Local Plan is in part unsound, because CA1b is not a true representation of what is planned. It says that the golf clubhouse will be relocated, and that additional holes will be acquired in South Oxfordshire. None of this is true. Reading Golf Club have told its members that they plan to sell the whole of the golf course for housing, with 300-500 homes on Reading Borough Council land, and 480 homes in South Oxfordshire. Members of the golf club have been told that they will receive a 6 figure sum from the sale of the land, which will be done in a phased way. The golf club have been talking to a planning expert, developers, and South Oxfordshire District Council, and should have informed Reading Borough Council of their plans, which are different from CA1b. So my objection is that CA1b is incorrect and gives a misleading impression. CA1b refers to 90-130 dwellings. A replacement club house. Replacement holes in South Oxfordshire. It is based on a golf course still existing. The public have looked at this description, and made their comments. But it is a masquerade. It does not say that the plot of land in CA1b is the first phase of a huge development. The public have rightly objected to the plan, because of lack of infrastructure – roads, no 3rd bridge, schools, GP surgeries, etc. Imagine the number of responses if the people of Reading knew that there are discussions about almost 1,000 dwellings on the golf course, not the 90-130 in the Local Plan. But the public were not able to comment because CA1b is not a reflection of what is being proposed. So I think CA1b, Part of Reading Golf Course, should be removed from the Local Plan.</p>	
Dunkley, Jim & Susie Downer	CA1b: Part of Reading Golf Course, Kidmore End Road	<p>We find it hard to believe that the building of yet more houses in the Emmer Green area is being considered. I wonder whether the planners have ever:</p> <ol style="list-style-type: none"> 1. Driven from Emmer Green toward Caversham and Reading during rush hour. 2. Having eventually reached Caversham experienced the frustration of trying to park at the Waitrose/Iceland car park. 3. Tried to book an appointment in one of the local medical 	

		<p>practices.</p> <ol style="list-style-type: none"> 4. Tried to get a place for their child in the local schools. 5. Damaged their tyres on the terrible road surfaces, Tarmac that cannot cope with the sheer weight of traffic. 6. Considered the new development of 120+ houses at Sonning Common and that traffic from this development will be using the same roads. 7. Considered that the Thames Valley is already over-populated. 8. Considered that if Reading Golf Course is built upon then the community will lose a green space with many trees which help to keep a healthy environment. 9. The existing infrastructure will not cope with more cars and more people and where is money to be found to provide more services, health, education, transport? 	
Evans, Gary	CA1b: Part of Reading Golf Course, Kidmore End Road	<p>This has just been brought to our attention by local residents and some that are as I do, have our properties backing onto the golf course. This is of concern to us due to the fact that Caversham and Emmer Green are already suffering from over development and cannot handle or support the existing population with the current infrastructure in place. The increase in traffic into the area (particularly with development in South Oxfordshire, namely in Sonning Common is also bearing more weight and strain on the only two road traffic bridges we have in Reading. The current NHS services with local surgeries and the Royal Berks hospital are under strain and under-performing, we are at Priory Avenue surgery, regarded as one of the worst in the country and with an increase in housing, it will not get any better! The schools are also under strain and a new school still not agreed for the Caversham area? Albeit there was one in the planning for when Bugs Bottom was passed and never appeared? The golf course is steeped in history over 100 years old and should be kept for recreation to the community of Reading and surrounding areas without alteration. When we had planning submitted for an extension to our property on Highdown Hill Road in Emmer Green, it was initially turned down for being an "over visually dominant</p>	

		<p>bulk and not in keeping with the natural beauty of the surrounding area.” What impact would 90-130 houses do to this area in respect to natural beauty? There are many trees with TPO’s along and across the golf course as well as natural areas for wildlife to thrive. We have seen deer, pheasants, foxes, badgers, bats, hedgehogs, toads, frogs, many bird species and more in our garden. This would create a massive impact to the wildlife in the area. I understand too from some of the members that they are not keen on this either and that it may be in the interest more for the shareholding members, as I am led to believe that they may get a substantial return with any development that gets passed. I have read the statement which is attached from the Chairman that a member has sent to me and it appears that the club has financial difficulties and are keen to progress. This is not in the interest of all members and certainly not all local residents! The club should be open more to the public and considering improvements in management, then perhaps it would be in a better place and continue to provide sport for the local community. We object to any planning proposals.</p>	
Farey, Steve & Julia	CA1b: Part of Reading Golf Course, Kidmore End Road	<p>With reference to the Residential and new clubhouse and suggestion of 100 dwellings, using plan densities approx. 85-134 dwellings we would to register our opposition to this and any further development of Reading Golf Course due to the impact on the environment and further pressure on the already densely populated area of Emmer Green. Road congestion at current levels is already causing major concerns in this area. Our current infrastructure is struggling to meet present demand, without adding all of the above. Additional housing, additional people and additional motor vehicles will increase emissions still further and the lost open land will be gone forever. Notwithstanding the effect on our wildlife, trees, shrubbery and open space that we need to maintain as a human race. We are gravely concerned not only about the present but the future of this area. It is beholden on all of us to protect our environment for the future generations.</p>	
Grashoff, Andrea	CA1b: Part of Reading Golf	<p>I do not believe the plan is sound, legally compliant, or fulfils the duty to co-operate. I strongly object to the inclusion of the area designated in</p>	

	Course	<p>CA1b and request its removal. Its inclusion is counter to two of the main expectations of the plan: open space protection and a positive strategy for heritage conservation. The whole of Reading Golf Course (RGC) is a natural open Green space supporting the environment and an extensive array of wildlife, fauna and flora. It has been this way for the last 108 years it should remain this way into the future. The area is an important green space with protected wildflowers and various tree species many subject to TPO. Any development would have a highly detrimental impact on the established balanced natural environment. Loss of recreation and amenity value would be highly detrimental and counter to RBC policy. The green space in question forms a natural conduit to the neighbouring ancient woodlands and areas of Outstanding Natural Beauty in the Chilterns in South Oxfordshire. Any residential development would not only have all of the above negative effects by would cause increased traffic flow on relatively narrow roads, excessive on-road parking and congestion in Caversham and the town centre. The promise of the third bridge in the document is clearly undeliverable. This has been undelivered for 30 years. The provision of this important link is not even mentioned under 'Major Transport Projects.' The body of the document recognises that the delivery is outside the remit of RBC and dependant on surrounding councils. The services and infrastructure for the houses in Emmer Green was designed to meet the needs of the original housing development in the 1930s -1950s. Adding more houses to the infrastructure would place an unbearable further stress on the infrastructure which is already stressed (especially healthcare and schools).</p>	
Howard, Bethan	CA1b: Part of Reading Golf Course, Kidmore End Road	<p>-unacceptable increase in traffic pollution, noise and congestion – hundreds of vehicles added to quiet roads with noise, congestion, high pollution resulting ill health/premature death and road safety hazards, especially children walking to school and the elderly or infirm (e.g. from local retirement housing).</p> <p>-high increase in air pollution and significant risk to health, especially children and risk of severe illness and premature death to all local</p>	

		<p>population</p> <ul style="list-style-type: none"> -this development is contrary to several statements in the Government's recently published 25 Year Environment Plan -unacceptable impact of traffic, noise and pollution on Courtenay Drive, with or without 'protection' for Kidmore End Road -inadequate provision of doctors -inadequate provision of school places -loss of green space and ecology -loss of green space that acts as an air filter for pollution from busy roads and from central Reading -possible inadequate water and sewerage provision -high risk of additional unwanted development after this 'first phase' -the size of the development is out of proportion to recent local development (garden infill) -the access to the proposed development on Kidmore End Road is unacceptable as already dangerous with speeding vehicles, bus stop hazards, parked cars, irresponsible overtaking and ice on the hill in the winter -risk of noise from leisure development events -adverse impact to residents of parking on residential roads, when car park full 	
Jones, Nick	CA1b: Part of Reading Golf Course, Kidmore End Road	<p>I'd like to register my objection to the Reading Golf club proposal to sell part or all of the club, and its impact on the proposed local plan. Emmer Green is bursting at the seams when it comes to infrastructure. We moved to the area in Summer 16 and had to send out kids to a non-local school, meaning car trips. The local schools don't have places and the key road junctions such as that at the Prince of Wales pub, are extremely busy. 90-130 new houses will swamp the infrastructure further. As a cycle commuter, I've had near misses on Evesham Road and at the roundabout with Pepperdine Road. My wife has witnessed accidents there too (bikes hit by cars). Again, traffic pressures from the news development would make the situation worse at busy times. National Cycle Route 5 also crosses the golf course at the end of</p>	

		<p>Highdown Hill Road. It is one of only two non-public highway ways to cycle into Reading and is used for commutes and leisure all week long. This is due to its status as a national route between London and Oxford. There are plenty of kids who use it to avoid having to cycle on dangerous routes (Peppard Rd from Emmer Green to Sonning Common). It is also used by charity cycles and by horse riders from the Stables adjacent to the golf course. As well as golf, the course provides leisure for walkers (dog walkers and others). It has a right of way which provides a great link that allows circular walks from Emmer Green and Caversham. I have also cross country skied here in winter. It is a fantastic resource of finely landscaped planting with beautiful mature trees. Many may not have a TPO. As we live right next to the course we can also watch the Red Kites in their nests and hunting across the course. Also, old maps indicate old habitation around the second and fourth greens and may be of archaeological interest.</p>	
King, Mr and Mrs DJ	CA1b: Part of Reading Golf Course, Kidmore End Road	<p>We understand that part of the Reading Golf course is being considered for development and we would like to express our objection. The current draft plan for 115 houses centred around the 18th and 1st tee effectively would mean the end of the Reading Golf course which, as mentioned in my previous letter, is the Green Lung of the village. Also open the door for much more development which the infrastructure in Emmer Green (Roads, Schools, Doctors, Water etc.) cannot cope. The impact of pollution, noise and traffic are often inevitable in any planning application but to take it away from Reading Golf Course which offers in terms of wellbeing so much to the village, together with the loss of wildlife, would be in direct contradiction to the planning guidance when there are so many brown field sites available in Reading. The site is clearly an amenity area of long standing and is very much an integral part of the social environment of this village, with many important trees which add to the areas lungs. Most residents would, perhaps understandably not be in favour of more development. There are many sites other than Emmer Green which could accommodate the infrastructure required to manage the impact of traffic, school places,</p>	

		healthcare and water supply which Emmer Green cannot handle.	
Lawson-Mudge, Jane	CA1b: Part of Reading Golf Course, Kidmore End Road	<p>It has been brought to my attention via a leaked correspondence among Reading Golf Club members that suggests a submission has been reissued to develop part of the course to make way for 130 houses and a leisure centre. If this is the case, how can it be possible that local neighbours have been given no notification of these proposals – with a 26th January deadline to voice any opposition? If this is based in fact, I would have to strongly place my objection on record – to further develop a green space, a haven to wildlife, in an area whose public resources are already under massive strain to meet the demands of primary school places and available doctors' appointments (to name but two objections) would be devastating to the local community. Where would any site entrance be positioned during proposed construction and how would the additional noise and airborne pollution from 130-260 vehicles be compensated for? The Kidmore End Rd is predominately, a country road that leads on to a narrow and highly restricted winding lane. Gravel Ln has already been partially cut off to prevent traffic cutting across from Kidmore Rd Caversham Heights to minimise accident and dangerous through traffic. Are RBC and the highways department honestly considering turning this quiet residential area into a noisy and polluted thoroughfare? I understand that this land borders both Berkshire and South Oxfordshire, so I would appreciate clarification as to how individual council's approach and authorise such decisions (in areas of shared boundaries). Do I need to address my letters of opposition, to two planning authorities? Please could you also provide clarification on the following concerns I have: As stated on the Reading Golf Club website, this is 'an area of park and woodland' a Green site, which is now, being put forward for development (bordering existing developments). I believe that a Site of Alternative Green space would need to be identified before any planning were approved. Where, would this S.A.N.G fall, if under a shared authority - would it be in Reading Borough or South Oxfordshire- or both? Additional concerns I have, are the contribution to the continuance of existing pathways and</p>	

		<p>cycle lanes and what would be done regarding the widening of highways to provide safe passage of traffic along narrow country lanes (single track with 'passing' in some areas). The proposal that is being put forward is for the development of 480 homes. This would be devastating on both the environment and on an infrastructure under existing pressure.</p> <p>Any large development would cause irreversible and significant environmental damage. My understanding is, that all new developments must make provision for at least 30% affordable housing; Older citizen housing; plus environmental conditions including bike and public transport allowances before planning is approved- am I correct in this belief? As this land was developed 100 yrs ago and is a long established recreational facility (open to members of the general public); would I therefore be correct in my understanding that these alternative facilities would have to be returned to the community, by way of relocation- if so- would that facility be located within Reading Berks or South Oxon? My concerns regarding all of these questions are steeped in the long held anticipation of previously unfulfilled planning 'promises' that now make the community less trusting of such assurances. The most publicly debated of these, continues to be an agreement over the location of a new school in Caversham & the continuing crisis over school places. Having attended the meeting at the Bugs Bottom development- where assurances were given that a school would be built and money paid to the council solely for this purpose- 20 years ago, and still no school being built, what assurances can our community now trust. Would S.A.N.G areas for the preservation or relocation of park; woodland and public, recreational facilities need to be appointed before planning were approved? I appreciate that many of my questions might be hypothetical at this juncture and the decisions I make reference to, occurred 20yrs ago, before many current councillors took office, but someone must be held accountable to both current and future generations.</p>	
Lawson, Ian	Policy CA1b	The plan is not sound. CA1b describes the change of use of the Reading	

		<p>Golf Course which has been an important asset of not only the locality but the whole of Reading for over 100 years. It has been the subject of successive overtures from developers over the years which to an extent blighted the club and the properties boarding the land. This important green asset should be left alone. To build 90+ homes on the land would overload the roads in the locality and cause further significant traffic jams which already can reach from the Henley Road to Buckingham Dr. CA2 discusses the development of Caversham Park. The need for a third river crossing would have to be completed before any new housing were to be approved for Caversham and Emmer Green.</p>	
Lunn, Sue	CA1b: Part of Reading Golf Course, Kidmore End Road	<p>I object very strongly to proposals by Reading Golf Club to development of all or part of their land in Emmer Green. The volume of traffic north of the river grinds to a halt very easily, with just a minor accident or small road works. So far we have been very lucky, but it is inevitable that some accident will happen and the emergency services will not be able to get through. To build even 150 houses and each with at least 2 cars would cause yet more pollution and danger on roads that are already very busy at times. It is important for health and safety to think very carefully about pollution levels, road safety, losing more green space and the danger to the environment. The schools (in particular, primary schools), local doctors' surgeries and hospitals are all over-subscribed and the situation is dire, without any more houses. It is very important to have the right infrastructure before even considering development. Development north of the river in Reading/South Oxfordshire is impossible without the building of a third bridge.</p>	
Morley, David	CA1b: Part of Reading Golf Club	<p>I do not believe the plan is legally compliant, sound or fulfils the duty to co-operate. I think the plan to develop on the golf course is ill considered for a number of reasons, the most serious in my mind is the impact on the already overpopulated road infrastructure in the area. The traffic getting into Reading in rush hour is even now ridiculous and I cannot see how an increase in traffic can be accommodated. In addition the schools and doctor surgery services are also I believe running at capacity. We are fortunate to live on the course and we see deer,</p>	

		rabbits and other wildlife as well as the wide variety of trees and shrubs, all of which would be lost if this development were to go forward. Finally the course at Reading should be considered as a great asset to the entire area and one that should be treasured. It has been in existence for over 100 years.	
Morley, Kim	CA1b: Part of Reading Golf Course, Kidmore End Road	I would like to register my concerns regarding the possible development of Reading Golf Club. I hope I am not being a NIMBY, but a development of the size being talked about of 400-500 houses would impact the local area. It would add to the congestion on already busy roads in the area in particular through Caversham which is already a bottleneck. Would the ever-talked-about extra bridge over the Thames actually happen? There is also a lot of pressure on local community services such as school and doctors surgeries. How will this be addressed? I understand there is a need for more housing, but the infrastructure does need to be in place.	
Parry, Richard	CA1b: Reading Golf Club Course	<p>I live in Eric Avenue and back on to the second fairway of Reading Golf Course. I have lived in this house since 1987 when I came to Reading with a work promotion. It is a lovely location and I and my family have been very lucky to live here. Recently I have become aware of the possibility that the Course may be given over to housing under the terms of the Local Plan and I am deeply concerned about this prospect and its implications for the whole environment in Emmer Green. In short I would like the Council to withdraw the Course from the Local Plan before it is submitted to the Secretary of State at the end of March. My objections and concerns can be summarised as follows:</p> <ul style="list-style-type: none"> • the increase in road traffic around Emmer Green and the roads into Reading. From personal experience it can take over 30 minutes to get as far as Prospect Street of a weekday morning and with perhaps another 500+ cars on these roads each day it may become intolerable. • the lack of sufficient healthcare and school places for an expanding population. I well remember the promises made when permission was given for the development of Bugs Bottom. None of which came to pass. 	

		<ul style="list-style-type: none"> • I understand that levels of pollution are already high across Reading and the increase in cars and car journeys together with the loss of green space would combine to make things much worse. • the Council and the Government have made it clear that they will prioritise the development of brownfield sites before considering green field sites such as Reading Golf Course. I have recently learned that the Homebase site in the centre of town is due to be converted into as large number of flats and it seems to me that this is in keeping with this strategy and far more sensible. • if the Course were to be developed I would expect the whole road network around Emmer Green to be reconfigured. A new junction at the at the end of Kidmore End Road plus the loss of part of the recreation ground to widen access to the roads into Reading. <p>I do hope that you and your team can be persuaded that the whole idea is impractical and, probably, unnecessary given the availability of brownfield sites that may better provide the number and affordability of homes the Council needs.</p>	
Rodda, Matt	CA1b: Part of Reading Golf Course	<p>I'm writing to express my opposition to the Reading Golf Course development in the draft Local Plan. I have met with residents of Emmer Green, and am satisfied that this draft plan runs counter to Council planning policy. Whilst I accept that the decision will ultimately be made by the local planning committee, I would like to put my opposition to this draft plan on record prior to its submission to the Secretary of State on 31st March 2018. I fear that, if this submission is accepted by the Secretary of State, future planning applications will be something of a formality. As such, I would like to argue the case against this plan in advance of it becoming a point of conflict and contention between the Council and residents of Emmer Green further down the line. Reading Borough Council has (in line with Labour Party national policy) rightly prioritised regeneration on brownfield sites in its own planning policy,</p>	

		<p>rather than on greenfield sites such as this one. There is enough brownfield land in Reading to accommodate for our development needs. As such, I see no reason to build in open spaces on the outskirts of town. Moreover, I do not believe that Reading Borough Council ought to sanction a development that would come at such a high cost in terms of pollution and traffic. Given a lack of transport links in this area (further outlined below), my constituents have calculated that the development would bring car movements per day. Consequently, Emmer Green would experience a potential ten-fold increase in traffic in Emmer Green (which hardly has the infrastructure to cope with this growth, in a town already plagued by car traffic). The Golf Course itself, furthermore, is a 'green lung' – absorbing carbon emitted in other parts of Reading. Building on it would, therefore, come at a cost to the total level of carbon emissions produced by this town. In fact, this planning application is in direct conflict with Council planning policy, and also the Government's 25-year Environment Plan, as regards:</p> <ol style="list-style-type: none">1. Future developments being within walking- or cycling-distance from amenities and employment opportunities (which is not the case here).2. Developments having easy access to public transport (again, not the case in this instance).3. Preserving open spaces, such as the Golf Course.4. Preventing further boundary developments, in areas like that around Kidmore End Road. <p>Finally, my constituents are also concerned regarding potential conflicts of interest within the planning committee and department. As 'confidential' communication within the Golf Club itself has stated that each member stands to earn a six-figure sum for the potential future sale of land, it is incumbent on me to stress that no Golf Club member (or relative of a Golf Club member) should be involved with the decision itself. I would like any Council official or Councillor involved with the planning process to declare any conflict of interest of this nature publicly, before the planning committee meets. I would be grateful if</p>	
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		you could let me have a reply dealing with the points raised here, and if you would reconsider this draft submission.	
Smith, Linda and Peter	CA1b: Part of Reading Golf Course, Kidmore End Road	<p>We have written to you on this issue earlier – see attached email comments dated March 2016 – chiefly concerning the adverse impact of developing the golf course site and adjoining local areas. We are of the opinion that the latest version of plans still has not addressed the key issues that we raised at that time and therefore repeat our objection. The latest plans still do not effectively address the points that we raised: The serious concerns of traffic density and further pressure on school places and doctor services. Indeed there are further points that must be considered alongside the proposals to develop the area in proximity to the Golf Course site: Since our last communication, it has become increasingly apparent that traffic density and speed along Kidmore End Road continues to worsen as the road is ever more a “rat run” to the main road to Oxford and Sonning Common. This has recently deteriorated even as new houses have been built on the edge of Sonning Common. This speed and density issue already causes concern due to the increased risk from the traffic to young children at the entrance and egress from the playing field area (well used) on Kidmore End Road. Already there is clear regular occurrence of road speed well in excess of 30 mph which posted limits seem unable to control. The proposed development is liable to lead to even more high speed occurrences and increased risk to children – both at play and walking to the local schools. The development would also lead to an increase in the traffic flows into the areas of outstanding natural beauty in South Oxfordshire, on roads which are not wide enough to allow two-way traffic flows. Some of these roads, especially the one from Emmer Green to Kidmore End, are already well-used and further traffic would significantly increase the risk of serious accidents. The potential development of the golf course area also should be considered alongside the risk to the fine, well-developed trees, many of which should be subject to existing TPO’s. Protecting such arboreal growth and environment is likely to conflict with the efficacy of proposed housing</p>	

		<p>development. Furthermore, we have in the past been told that the area is one where there is an active community of bats. We would expect that any plans of mid/large-scale development as proposed would be subject to the usual restrictions and controls that apply for such protected species. These concerns, together with the points raised in our original communication to you confirm even more that the risk to our young children, the surrounding environment and its amenity outweighs any potential benefit that may be realised from such a development. We reiterate our opposition to the proposals in the Reading Borough Local Plan.</p>	
Smith, William	CA1b: Part of Reading Golf Course, Kidmore End Road	<p>I do not consider this policy to be legally compliant, sound or that it fulfils the duty to co-operate. Given the scale of the proposed development there are serious access issues to and from the main road that would be very disruptive to the surrounding area and its residents. These would be extremely difficult and expensive to remedy. If Clayfield Copse was turned aside I cannot see why this site with far more access issues should be even considered. Developments such as the Bewley Homes development which has direct access to the main road makes much more sense although some of the comments below also apply. There are currently serious access issues to the centre of Reading, the IDR and beyond from North of the Thames. The rather obvious solution to this would be the third bridge inking to the 329M. Until this is actually built there can be no question of any further development on this scale north of the river. The Golf Course itself provides a beautiful open space enjoyed by members past and present and hopefully the future. Far too many such leisure facilities are being destroyed. There are also a large number of local residents who enjoy views over the open space with its many long standing trees many of which have preservation orders on them. There are already many shortcomings in the provision of essential services to the current residents of the area, a lack of school places and insufficient medical services (try getting a doctors appt in Emmer Green!) Given the access issues raised, only sites with direct main road access should considered. A third river crossing would need to be in</p>	

		<p>place before any major schemes such as this can be considered. The schemes must not be sanctioned without the bridge. The golf course fails on both issues. I do not wish to appear in person at the examination.</p>	
<p>Staines, Mark and Rachael</p>	<p>CA1b: Part of Reading Golf Course</p>	<p>I do not believe the Local Plan is legally compliant or sound. Within this document sections: 8.2 relates and puts the plans into direct conflict with statements made. 8.2.1 (b). Is not achievable. Based on location of planned site. 8.2.1 (e) this proposed plan places more immediate and direct pressure on an area of Outstanding Natural Beauty. Road infrastructure to the site is significantly restricted on Kidmore End Rd with a single flow of traffic in operation at the upper most end of Kidmore End Rd adjoining the Peppard Rd. 8.2.4 states: "As a result of the limited development capacity, the overall strategy in this area is largely based around ensuring that, where development is to be accommodated, it is done in a way that prevents adverse effects on the existing areas. Of particular importance in Caversham and Emmer Green are potential effects on landscape, heritage and infrastructure. The relationship of the landscape with the Chiltern Hills and River Thames, described in paragraph 8.1.6, and of the townscape with the former separate settlements of Caversham and surrounding hamlets, will be preserved." This proposed development directly conflicts with the above statement. The local schools do not have sufficient capacity for what could be expected to be an additional 180+*children. The roads and parking availability cannot accommodate the projected 200** cars. This does not take into account site access for Heavy construction vehicles, which would require navigating through quiet residential roads (single lane in places) and may not have sufficient access. 8.2.5 states: "The adequacy of infrastructure to support additional development remains one of the most significant concerns in the area. In particular, transport, education and healthcare are issues that would need to be addressed in any development." The council have already identified that any such development effectively is not viable. There are more appropriate sites as referenced within the document that provide a more immediate and</p>	

		<p>viable planning option from an accessibility perspective. However core infrastructure pressures will remain for main road access, schools, doctors' surgeries and access to the main arterial roads.</p> <p>** Estimated figures based on 90 dwellings</p>	
Teer, Sigi	CA1b: Part of Reading Golf Course, Kidmore End Road	<p>I am concerned about further development in the Caversham/Emmer Green area, particularly the proposal to build 90-130 dwellings on part of Reading Golf course in Kidmore End Road. The infrastructure in this area is not in place to take more housing. The road infrastructure is insufficient. At the moment it can take up to 20 minutes to get from Emmer Green to Caversham, let alone Reading. The traffic jams at the traffic lights between Peppard Road and Prospect Street are a nightmare. There is often a queue of cars from the traffic lights at the bottom of Peppard Road right up to the Esso petrol station in Buckingham Drive. Before RBC considers further development in this area, a third Thames Bridge is a MUST to alleviate the traffic problems which are already horrendous. Part of Kidmore End is a single land road as cars are parked in front of the terraced cottages. Furthermore, it takes a long time to get onto Peppard Road from the junction with Kidmore End Road as the flow of traffic is constant. On Saturday it took me 10 minutes to find a parking space at Waitrose car park in Caversham because there is already an overload of people and cars which Caversham obviously cannot cope with. Surgeries – The waiting list at Emmer Green Surgery for an appointment is long and is getting worse. Green Space – Reading Golf Course is 108 years old. A beautiful landscape which is enjoyed by golfers and walkers alike. Something we should be proud of and not to be destroyed by more housing. Spaces like this are important for physical and mental wellbeing. There are hardly any beautiful green spaces left in Emmer Green. There are old mature trees and wildlife whose habitat will be destroyed and will not be able to be replaced. I strongly oppose a housing project at Reading Golf Course.</p>	
Teer, Trevor	CA1b: Part of	I would like to strongly object to any further development in Caversham	

	Reading Golf Course, Kidmore End Road	<p>and Emmer Green. Firstly the road infrastructure is not capable of taking the extra traffic that such developments would generate. The traffic jams at the traffic lights between Peppard Road and Prospect Street are a nightmare at the moment without any additional traffic. The same goes for the junction between Bridge St and St Peters Hill. As everyone knows a third Thames Bridge is urgently required to enable traffic to get over the Thames rather than having to go over to Sonning, which has only one carriageway, or through the centre of Reading. A third Thames Bridge must be one of a number of pre-requisites before any further development north of the Thames can be contemplated. Your proposal for developing Reading Golf Course particularly worries me. Reading Golf Club is 108 years old this year and to contemplate ravaging such a lovely green space and amenity is sacrilege as far as I am concerned. The golf course is also home to many species of animals and insects and would be impossible to replace as green lung for the area. Kidmore End is effectively, in large part, a single lane road with cars parked outside of the terraced cottages. Any extra traffic using that road would just exacerbate the situation beyond acceptable limits. This would only be partially mitigated by widening the road and taking away some of the playing field! There are many other reasons that I could enumerate which would make the proposed development beyond the pale but I will just say that such an idea will infuriate many local people in Emmer Green. I therefore strongly oppose these proposals.</p>	
Waite, P	CA1b: Part of Reading Golf Course	<p>I am writing to state that I want the site to be removed from the local plan for the following reasons: Traffic in Emmer Green and Caversham is always congested already. There are bottle necks at the two bridges every day, for most of the day. The stationery traffic increases pollution making it unpleasant to walk anywhere or even wait at bus stops. The number 22 bus service has been reduced which means people will have to use their cars more. The bus service north of the river is far less frequent than to other parts of Reading. The golf course is a greenfield site and is a much needed 'green lung' in an urban area with a traffic problem. Local infrastructure is barely coping with the existing</p>	

		<p>population. The Heights School was announced 3 ½ years ago and is almost full on its temporary out of area site off Gosbrook Road. There are no firms plans (announced) as to where or when it will be built for existing residents. What provision for education will be included if this development went ahead? The council still has not addressed the fiasco over the lack of a school on the Bugs Bottom development. The Waitrose car park barely copes with existing customers. Any increase in the local population will put more pressure on the village centre. Anyone living on the new development would have to travel south, towards Caversham and the two bridges to access local services. The consultation period for this development is far too short. As usual, those most affected seem to be the last to know. Our local MP is against this development and as he represents us, I hope you will accept his opinion.</p>	
Wakely, Nigel	CA1b: Part of Reading Golf Course	<p>I am making this representation at the last minute since I only became aware of the local plan proposals this week. My first comment therefore is that the consultation process is itself ineffective in that it fails to inform those who are likely to be directly affected by proposals. In my view, this proposal (CA1b) fails the soundness test. It's inclusion in the plan appears to respond to an opportunistic wish to sell land for housing development rather than as a conclusion from objective planning analysis. Reading has very few areas that are not already developed so destroying remaining green space should be considered last of all when assessing the alternatives. From environmental & sustainability viewpoints, it appears perverse to proactively allocate this site. During the Local Plan's consultation phase, others raised many specific and legitimate concerns that the development would make things worse than they are now for the local community, for example:</p> <ul style="list-style-type: none"> • Environmental quality, leisure facilities and green space would be diminished • Traffic congestion in the local road network and through the bottlenecks of Caversham shopping centre & the Thames bridges would be exacerbated 	

		<ul style="list-style-type: none"> Local schools and healthcare facilities are already full and so would become overloaded <p>The planners' responses do not convince me that adequate funding and actionable plans will be brought forward to properly deal with these concerns. The planning approach appears to simply focus on the provision of additional housing and to brush aside all other issues. In fact, the proposal appears to make existing issues worse than they now are. If this pocket of land is no longer needed by the golf club, then the plan should consider alternative uses that help solve problems raised during the consultation process and justify why allocation for housing is better for the local community than using it for leisure, provision of healthcare, schools or other needs. Furthermore, I would advocate that if, following sound analysis, housing development is to be allowed, it should be on condition that the remaining green space owned by the golf club is given long-term protection and is opened to provide better public access.</p>	
Williams, Christine	CA1b: Part of Reading Golf Course	<p>I do not consider this policy to be sound or that it fulfils the duty to co-operate.</p> <ol style="list-style-type: none"> Local primary schools and the nearest secondary school are currently oversubscribed. No mention of additional schools Traffic on Kidmore End Rd – incidents which have caused even slightly heavier traffic than usual down Kidmore End Road lead to gridlock back from the junctions of Kidmore End Road and Grove Rd/Peppard Rd. With additional 90-130 dwellings this would almost certainly become a daily occurrence, particularly if families had to drive to get to school(s). Traffic in Caversham – traffic coming from north of the river is already causing numerous issues in Caversham and across the 2 bridges. New Houses in Oxfordshire – there are currently plans for additional houses near the border of Berkshire/Oxfordshire which will add to the above issues. <p>The following modifications are required:</p>	

		<ol style="list-style-type: none"> 1. Additional school(s) or additional provision at local schools. 2. Investigate road layout changes, particularly with the junctions of Kidmore End and Peppard Road and around Grove Rd (one way system?). 3. A more immediate solution to a 3rd bridge over the Thames. 	
Cushley, Jim	CA1b: Part of Reading Golf Course	<p>I wish to object to the development on Reading Golf Course, as described in CA1b in the Local Plan. I would like this site to be removed from the Local Plan before it is submitted to the Secretary of State. I think the Local Plan is in part unsound, because CA1b is not a true representation of what is planned. It says that the golf clubhouse will be relocated, and that additional holes will be acquired in South Oxfordshire. None of this is true. Reading Golf Club have told its members that they plan to sell the whole of the golf course for housing, with 300-500 homes on Reading Borough Council land, and 480 homes in South Oxfordshire. Members of the golf club have been told that they will receive a 6 figure sum from the sale of the land, which will be done in a phased way. The golf club have been talking to a planning expert, developers, and South Oxfordshire District Council, and should have informed Reading Borough Council of their plans, which are different from CA1b. So my objection is that CA1b is incorrect and gives a misleading impression. CA1b refers to 90-130 dwellings. A replacement club house. Replacement holes in South Oxfordshire. It is based on a golf course still existing. The public have looked at this description, and made their comments. But it is a masquerade. It does not say that the plot of land in CA1b is the first phase of a huge development. The public have rightly objected to the plan, because of lack of infrastructure – roads, no 3rd bridge, schools, GP surgeries, etc. Imagine the number of responses if the people of Reading knew that there are discussions about almost 1,000 dwellings on the golf course, not the 90-130 in the Local Plan. But the public were not able to comment because CA1b is not a reflection of what is being proposed. So I think CA1b, Part of Reading Golf Course, should be removed from the Local Plan.</p>	<p>No change proposed. No formal proposal for development of the whole golf course has been put forward to the Council for consideration, either for inclusion in the Local Plan or as a planning application. As such, the Council has in no way advocated or endorsed this proposal, nor provided any formal comments to the Golf Club on it. It is not included within the Local Plan for Reading, or for South Oxfordshire. There are clearly a number of significant issues that would need to be taken into account with such a proposal, and it would need to be assessed if and when it is formally submitted to us. It would also require extensive co-operation with South Oxfordshire District Council. This would of course require further consultation, either as part of a local plan or as a planning application.</p>
Eden-Jones,	CA1b: Part of	I am grateful for the plan's identification of sensitivities relating to this	

Sarah	Reading Golf Course, Kidmore End Road	<p>development and the care that needs to be taken. However I understand that very recently on 23rd January, therefore since the publication of the Pre-Submission Draft Local Plan, there were firm proposals by the Chairman of Reading Golf Course to sell the whole site and re-locate the club elsewhere. This is an entirely different proposition to that in the Plan. <u>I believe, in the light of this, greater restrictions needs to be put in the Plan for this site to manage the ambitions of developers.</u> I would urge the Council to consider very carefully the impact of 700 dwellings – suggested by the golf club and feasible if agreed to by South Oxfordshire – on this piece of land on the surrounding area. Already the schools in the area are at capacity. Even if only half of the suggested dwellings had one child on a conservative estimate that is a whole new school that would be required. This is the same issue for doctor’s surgeries. Strain would also be put on the water and sewage network. The roads are already at gridlock in this area in the mornings and evenings and there is much congestion with the schools around St Barnabas Road with risks to pedestrians and cyclists. I believe there is no capacity in terms of infrastructure of this area for additional housing on this site. Equally as the plan has identified the Golf course is home to a rich natural habitat for birds, Red Kites especially, and other wildlife, plants and ancient woodland. It provides an area of recreation and enjoyment for local people. It greatly improves the quality of life for the significant number of houses which border the site and the children of Emmer Green Primary School whose grounds also border the golf course. Maintaining such a quality of life is an objective of your plan. While the owners of the Golf Club have little regard for these concerns, leaving with money in their pockets, RBC does rightly have a duty for Reading inhabitants to maintain the balance in the built and natural environment. I urge you to keep to this task.</p>	
Emmer Green Residents Association	CA1b: Part of Reading Golf Course, Kidmore End Road	<p>This part of the plan is unsound. There is real concern among the residents in the locality of this planned housing development that is unsound – in that it will not be deliverable in accordance with the Plan’s provisions. The measures needed to mitigate impacts on the local</p>	<p>No change proposed. It is not clear why the measures required as part of the policy would necessarily be unviable to deliver. Off-site transport works are a regular feature of</p>

		<p>infrastructure are set out, and it is a general principle of the Plan that developments will provide/contribute towards infrastructure needs. The proposal also identifies other benefits to flow from the scheme – replacement golf homes, replacement club house and on-site public open space. The fear is that the provision of these benefits and the safeguarding of local infrastructure will be beyond the financial capacity of the development. It has been understood locally that the widening of the nearby section of Kidmore End Rd that is effectively single track would in particular be complex and expensive. Widening will be essential if the use of residential roads as rat runs is to be avoided. If adequate financial capacity is a problem, the local believe is that it will be the funding of local infrastructure will be restricted. A more robust, sound Plan would identify a significantly reduced number of houses for the site. This would be certain to reduce the impact of the local infrastructure whereas the provision of contributions will be uncertain. We do not wish to appear in person at the examination.</p>	<p>development proposals, as is the provision of on-site open space.</p>
Robbins, Gary and Julia	CA1b: Part of Reading Golf Club	<p>We would like to object to proposed development in the above location. We are concerned that our view onto the open area of the golf course would be completely destroyed. Squeezing houses into this area has not been thought through and would cause immense strain on the surrounding area such as; services which are already oversubscribed, schools and GP surgeries, impact on congestion, noise and pollution would also spoil what is at present a peaceful area in which to live. We are also concerned that such a development would have a detrimental effect on the house prices of residences currently backing onto the golf course, as is ours. The area also provides a rich habitat for wildlife for example red kites are commonly seen flying or nesting in the trees of the golf course. We do not want this proposal to go ahead. Please note our comments were based on the redevelopment of all of Reading Golf club land. (Unable to find information for this). We are not opposed to the small part of Reading Golf club as outlined on site A19 in principle. Dependent on the number dwellings.</p>	
Grashoff, G J	CA1b: Part of	<p>I do not believe the plan is legally compliant, sound or fulfils the duty to</p>	<p>No change proposed.</p>

	<p>Reading Golf Course</p>	<p>co-operate. The document is not compliant, as comments included in the “Statement of Consultation on the Draft Local Plan” (Nov 2017) have been summarised and key elements of comments have been excluded. This potentially hides important information. It does not comply with the duty to co-operate as there is no rigorous analysis of the interaction with all relevant bodies that should be consulted. The Pre-Submission Draft Local Plan should be withdrawn and the Statement of Consultation thoroughly reviewed and revised to present a complete version of all comments made. I would like to appear at the examination in person.</p> <p>Additionally, comments made by the Reading Borough Council Officer in the Statement of Consultation in response to representations are inadequate, non-specific, out-of-date and clearly not well-constructed. For example: “Ecology: The part of the Golf Course identified is not a designated Wildlife Heritage Site/Local Wildlife Site. Previous ecology advice has not identified any particular significance.” This is clearly out-of-date. The responses made on behalf of RBC should be reviewed and revised so that they are current, relevant and devoid of bias.</p> <p>The inclusion of CA1b is totally inappropriate. The document reads like RBC encourage the building on houses on land that is private and has been used as green space and leisure facilities for more than a century, without any submission for planning. It appears that RBC are proposing a plan to utilise this space without any positive intent from the land owners to pursue a development. Furthermore the plan proposed requires action by third parties SODC to be undertaken to allow any sensible progress. The document makes no reference to any attempt to co-operate with Reading Golf Club to establish the opinions of the land owners. Nor is there any reference to co-operation with SODC about the potential acquisition of land which would require their planning approval for either a change of use or new buildings. The allocation should be removed. The inclusion of CA1b is opposed to the following elements of the plan:</p>	<p>The Statement of Consultation states quite clearly that it is a summary. This is necessary to allow comments to be presented and responded to in a concise manner, and is a quite usual way of doing things. There are no legal requirements that have been breached in doing so.</p> <p>It is not clear why the reference to ecology is out of date. It remains the case that the site is not a Local Wildlife Site, and it is not clear why ecological advice from 2009/10 is necessarily out of date when there has been no significant change to surrounding areas or on site.</p> <p>The Council is not pursuing any agenda other than seeking to meet its development needs in as sustainable a way as possible. The golf club proposal as allocated was put forward to the Council by Reading Golf Club.</p> <p>RBC have raised the issue of potential additional land within South Oxfordshire for additional holes with SODC. There is no in-principle issue with this, although proposals will need to be considered on their merits.</p> <p>In terms of principle a, enhanced pedestrian links between Caversham and Reading centres, this is a longstanding aim. The provision of a popular pedestrian and cycle bridge between the two demonstrates support for this.</p>
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		<p>local wildlife site and protected species buffer zone (SODA SHELAA number 71).</p> <p>SODC exclude the total area of Reading Golf Course that falls in their jurisdiction from any development and designate it as “undeveloped Golf Course” until 2036. There should be a new policy with Local Green Space designation. This would bring positive effects when measured against the sustainability appraisal.</p>	
Historic England	Policy CA1b	Policy CA1b - Historic England welcomes the requirement in Policy CA1b for development to take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Sport England	Policy CA1b	CA1b: Part of Reading Golf Course – Sport England supports this policy but emphasises it is on the proviso that the replacement clubhouse has been relocated and is operational along with replacement holes, prior to the existing site being redeveloped.	Noted. No change needed.
Historic England	Policy CA1c	Policy CA1c - Historic England welcomes the requirement in Policy CA1c for development to take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy CA1d	Policy CA1d - Historic England welcomes the requirement in Policy CA1d for development to take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
TA Fisher	CA1d: Rear of 200-214 Henley Rd, 12-24 All Hallows Road & 4, 7 & 8 Copse Avenue	We write on behalf of our clients TA Fisher in respect of the Pre-Submission Draft Local Plan. Our clients own land at Overton Drive included within the proposed allocation CA1d. We have noted a drafting error in the proposals map which needs to be amended. The policy states that access will be taken from Overton Drive. However, as can be seen in the attached extract from the map, the southern part of the allocation does not extend to Overton Drive. Instead the southern parcel	<p>Partially agreed. Change proposed.</p> <p>It is agreed that the boundary of the site should be slightly changed to connect to the road by which it must be accessed. It is also agreed that the policy should clarify that air quality issues relate to the southern portion of the site.</p>

		<p>of the allocation stops some way short of Overton Drive. Our clients therefore request that the proposals map is amended so that the allocation extends to Overton Drive, as is the case with the northern part of the allocation. Policy CA1d proposes the allocation of land to the rear of 200-214 Henley Road, 12-24 All Hallows Road and 4, 7 and 8 Copse Avenue for residential development. However, there are a number of errors and inaccuracies in the Policy which need to be amended to make the Plan sound. As currently drafted the Plan is unsound as this Policy is not Positively Prepared or Justified for the following reasons:</p> <ol style="list-style-type: none"> 2. The proposals map has a small error in respect of this allocation. The allocation boundaries of the 'southern parcel' (i.e. the land rear of Henley Road) should be extended until it meets Overton Drive. As currently drafted, there is a gap between the 'southern parcel' allocation boundary and Overton Drive. 3. The proposals map also shows a 'green link' through Overton Drive. However, that development has been completed. There is no space, nor ownership ability, to deliver the green link through Overton Drive to All Hallows Road. This in turn renders the green link through the 'northern parcel' of the allocation pointless, as it would not be capable of connecting beyond site frontage to Overton Drive. Furthermore, the link extends westwards across school playing fields. These are in active use and would not provide a suitable green link, as the use would disturb any ecological potential. This section of the green link is thus not practical, not justified, deliverable or based on any evidence and should be removed. The section from Overton Drive to the western boundary of Micklands Primary School should be deleted from the proposals map. 4. As a result of the deletion of this part of the green link from the proposals map, the accompanying wording in Policy CA1d should also be removed. This wording requires a green link along the eastern boundary of the site adjoining the gardens on 	<p>In terms of green links, the supporting text is clear that this can be as simple as a strip of trees or landscaping, which can include lines of trees in gardens. The fact that a playing field is in active use also does not mean that it cannot constitute part of a Green Link. There are strips of bushes along the entrance to Overton Drive, which then link in to well-vegetated back gardens, and it is considered that the link remains relevant.</p> <p>In terms of archaeology, Berkshire Archaeology have identified this site as having possible archaeological potential.</p> <p>In terms of contamination, part of the site (the gardens of 14-20 All Hallows Road) is recorded in the Council's records as being a former gravel pit with potential for contamination.</p> <p>In terms of dwelling numbers, the masterplan provided shows a development within the range expressed and does not therefore demonstrate that more dwellings can be accommodated. The supporting text to the site allocations is clear that the numbers of dwellings set out are not to be regarded as a restriction, and it may be possible to demonstrate potential for additional dwellings at planning application stage.</p>
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		<p>Copse Avenue. The removal of this wording is further justified as the green link could not be retained in perpetuity. Whilst a developer could deliver the link, this would likely fall in the back gardens of the new dwellings. The new property owners could choose to amend, not maintain, severe, or remove the elements of the link in their private gardens. Therefore the requirement should be removed.</p> <p>5. The Policy requires that the entire allocation “address air quality impacts on residential use”. However, only the ‘southern parcel’ (rear of Henley Road) falls within an Air Quality Management Area (AQMA). The ‘northern parcel’ (rear of All Hallows Road) is outside of that AQMA and therefore should not be required to address air quality impacts.</p> <p>6. Accompanying these representations is an illustrative Masterplan (Dwg. No 15303-001 Rev A) which shows that the site could potentially deliver 25 dwellings. Alternative layouts may allow for the delivery of a slightly higher number, and therefore the wording of the Policy should reflect this.</p> <p>7. The site is not in an identified archaeological area; it is not within a Conservation Area; and it does not contain any listed buildings. No evidence has been presented which justifies why the site should specifically be required to take account of potential archaeological significance. Similarly, there is no history of contamination or likely risk of contamination in this location. Therefore, these requirements are not justified and should be removed. The following modifications would make the Plan Sound:</p> <ul style="list-style-type: none"> ○ Amendment to the Proposals Map to extend the ‘southern parcel’ of the CA1d allocation so that it reaches Overton Drive. ○ Removal of the green link from the junction of Overton Drive and All Hallows Road, to the western boundary of Micklands Primary School. 	
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		<p>Amendments to the text in Policy CA1d so that it reads as follows: CA1d REAR OF 200-214 HENLEY ROAD, 12-24 ALL HALLOWS ROAD & 4, 7 & 8 COPSE AVENUE Development for residential.</p> <p>Development should:</p> <ul style="list-style-type: none"> • Be accessed from Overton Drive; • Be designed to retain important trees and groups of trees, and avoid adverse effects on important trees including that protected by TPO; • Avoid a net loss of biodiversity, and provide for a net gain where possible; • Provide for a green link along the eastern boundary of the site adjoining the gardens of Copse Avenue; • Take account of potential archaeological significance; • The southern parcel, comprising the land to the rear of 200-214 Henley Road, will be required to address air quality impacts on residential use; • Address any contamination on site; and • Ensure appropriate back-to-back separation from existing residential. <p>Site size: 0.87 ha at least 17-25 dwellings</p>	
Historic England	Policy CA1e	Policy CA1e - Historic England welcomes the requirement in Policy CA1e for development to take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy CA1f	Policy CA1f - Historic England welcomes the requirement in Policy CA1f for development to take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework, although we would like to see “which should inform the development” added to the end of the fourth bullet point.	Noted. No change needed.
BBC	Policy CA2	This representation relates to Policy CA2: Caversham Park, land over which the BBC is Freeholder at the time of this submission. The BBC is in	Partly agreed. Change proposed.

		<p>the process of vacating the site as their operations at the facility are coming to an end and are therefore selling the land and at this point in time, prospective purchasers are engaged in a formal bidding process. In order to establish the next use for Caversham Park after the BBC's operations have ceased and the site has been vacated; and to ensure a sustainable, viable future (which by default requires considerable investment), the BBC instructed Lambert Smith Hampton to assemble a design team to enter into formal pre-application discussion with RBC to discuss the development potential of the site. This formed part of a due diligence exercise to establish an optimal use of the site based upon what is considered to be a realistic amount and type of development that can be achieved, subject to obtaining the necessary consents. To reach this position, development/design feasibility options were taken through two stages of formal re-application engagement with RBC and one round of pre-application engagement with Historic England. The design work undertaken was informed and influenced by an assessment of transport and highways implications of new development, the ecological constraints on the land and the historical significance of the site which is identified as a Listed Building and Historic Park and Garden under the Planning (Listed Buildings and Conservation Areas) Act 1990. Well aware of these constraints, particularly focused on heritage related matters, the design work undertaken took into consideration all of the heritage assets on the site, both as individual assets and collectively having group value; with these including the Grade II Listed Caversham House, Caversham Park (Grade II Registered Park and Garden), the Grade II Listed Inner Park Walls, the Grade II Listed Entrance Gate and Gate Piers into the Park and the Temple to the west of Caversham House (also Grade II Listed). The design feasibility options presented to RBC via the pre-application route were indeed sensitive towards these constraints. LSH first met with Officers in December 2016 following the submission of a formal pre-application request to RBC in November. The scheme put forward made provision for a total number of 265 residential units to be developed on the land, informed by discussions</p>	<p>In terms of conversion of the building, it is agreed that reference should be made to 'other suitable uses compatible with its heritage'. Specifying hotel use is not considered appropriate, as this would require compliance with the sequential test, but if it can be justified this may fall within the broader definition.</p> <p>It is not agreed that the reference to dwelling numbers should be removed, as there needs to be a figure to monitor against, but insertion of 'currently' estimated may assist in this regard.</p> <p>Reference to historic interest should be brought more fully into line with the NPPF wording.</p> <p>The change to significant rather than protected trees is accepted.</p> <p>Some of the other more detailed changes are considered to unacceptably dilute the terms of the policy.</p> <p>In terms of the potential wider development, the policy as it stands does not place any additional restrictions upon the site than already existing as a result of its registered park/listed building status, wildlife significance, Tree Preservation Orders etc. The policy clarifies that it is not allocating the site for development, which is necessary to avoid misunderstanding, but this does not prevent a proposal being brought forward. All the policy does is reflect those</p>
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		<p>and assessments undertaken by a multidisciplinary team including, in addition to planning, Turley Heritage advising on particular significance of the heritage assets, JMP Consultants advising on traffic, transport and highways related matters and Aspect Ecology guiding on habitats and ecological matters. As part of these proposals, the Grade II listed House would be renovated and converted to provide 47 residential units; the formal gatekeeper and staff houses would also be converted to C3; and 220 additional dwellings would be provided on the site. The initial proposals raised concerns at Officer level, in particular with regards to the quantum of development on the site and heritage impact. The scheme was subsequently revised to reduce the total quantum to 189 units in total; in addition a full Tree Survey and Arboricultural Impact Assessment were undertaken and used to inform the revised scheme including: retention of the Orchard and reduction and revisions to the number and layout of the units within the confines of the Registered Park and Garden (RPG) to respond better to the surrounding context and to reduce its impact on the setting of the Listed Building. A follow-up meeting took place on 29th March 2017 where Officers confirmed that the changes made constituted a significant improvement and that while the key consideration for any future application coming forward will be the impact of the proposals on the setting of the listed building and ground, the proposals as updated represented ‘less than substantial harm’ and would need to be weighed against the public benefits of the scheme. These could include landscape enhancements, habitat and ecological enhancements, delivery of housing (unit types and sizes) identified to be needed and restoration of the house and grounds with the potential to improve public access/enjoyment. The Council also confirmed that the site in its current state does not provide optimal conditions for protected species and therefore any impact on existing biodiversity could be managed through suitable mitigation and enhancement. Officers also confirmed that the scheme reviewed was proudly acceptable in transport and highways terms and that on the whole any environmental impacts (trees, ecology, and highways) could</p>	<p>existing issues and notes that it will be for an applicant to justify how these can be overcome. At this stage, the Council remains to be convinced that they can be overcome, but even if the policy were to be removed in its entirety, the issues would still remain. The one additional requirement that could be considered a restriction is the need for public access, but this is considered appropriate in a significant extensive registered historic park forming a key part of Caversham’s heritage.</p> <p>With regard to the follow up meeting on 29th March 2017, there are a number of claims made about officers’ feedback that does not accord with the officers’ recollections of that meeting. No notes of this meeting were agreed. It is worth clarifying that:</p> <ul style="list-style-type: none"> • The representation states that officers confirmed that the proposals were a significant improvement. Whilst this may have been the case, this does not by any means indicate that the scheme was potentially acceptable; • Officers did not accept that there would be less than substantial harm, but stated that the view of Historic England would be necessary; • Officers did not confirm that biodiversity issues could necessarily be mitigated; • Officers did not confirm acceptance of the transport and highways impact; and • Officers did not agree that residential development within the grounds and not on
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		<p>be resolved. During the pre-application discussions with RBC, officers accepted that any proposals coming forward on this site would need to include an element of residential within the grounds of the house, not exclusively on the previously developed parts of the site. Indeed, all the tender submissions considered by the BBC included varied levels of additional development in the park, north of the house. This demonstrates that no interested parties considered that the conversion of the house on its own would be viable without the need for additional development on the grounds. We welcome the policy support within the Pre-Submission Local Plan for the change of use of the historic house from offices to an alternative use but note that this is restricted to “residential and/or a cultural community or heritage use, where we believe this should also include hotel and retirement accommodation uses which are both compatible uses with the building; and we note that development is restricted by limiting new development on previously developed land within the site. We are seeking amendments to policy CA2 in order to promote a recognised national government desire to deliver housing in sustainable locations. Critically, we are concerned about the restrictive nature of the policy, given that it is not supported by a robust evidence base or due diligence exercise which seeks to highlight which elements of the site are of particular interest; it therefore assumes that any additional development would necessarily have a negative impact on heritage, landscape, trees and views when in reality discussions with Officers to date have highlighted that there are clear opportunities for heritage, landscape and biodiversity enhancements, and that adequate access onto the site can be secured.</p> <p><u>Reasons policy is considered to be unsound</u> According to NPPF paragraph 182, Local Plans will be examined by an independent Inspector to assess soundness. In order to be sound, the Local Plan needs to be positively prepared, justified, effective and consistent with national policy. In this instance, the Local Plan is considered to be unsound where Policy CA2 is worded in a manner</p>	<p>previously-developed land would be necessary.</p> <p>Duty to co-operate issues are dealt with in the Duty to Co-operate Statement.</p>
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		<p>where it can be used to obstruct sustainable development that will help the Borough meet the objectively assessed development needs with particular regard to housing, including unmet requirements from neighbouring authorities and London. The SHMA noted that the Core Strategy based projections suggested that the Borough requires 541 new homes per annum to accommodate the estimated 11.4% population growth across the plan period up to 2026. The SHMA also noted however that with the inclusion of factors including London migration uplift, economic uplifts, and the uplift in the numbers required to address affordability issues, the objectively assessed need for Reading's housing over the period of 2013-2036 was estimated to be 699 new dwellings created per annum. Whilst it is noted that the SHMA does not set defined housing requirements for RBC, it does instead provide an objective assessment of the need for housing. This does not take into consideration constraints such as planning policies which may or may not conflict with achieving these targets. Whilst the Council's 6.01 years supply of housing when measured against objectively assessed needs seems a reasonable supply, albeit not as strong as when measured against the Core Strategy targets, the needs are likely to change as a result of a range of factors which include, but are not limited to:</p> <ul style="list-style-type: none"> • Increased employment in Reading; • Growth of student population due to growth of Reading University (with potential increases in numbers staying in Reading after completion of academia); • Arrival of Crossrail services towards the end of 2019, improving connectivity with London; and • Population growth across the South East of England. <p>This report does not expect there to be issues in meeting the 10,930 dwellings target by 2026 through existing permissions and Local Plan allocations, in fact the expectation is that this will be exceeded, however it acknowledges that meeting the objectively assessed needs identified (699 homes per year) beyond the 6.01 years will be considerably more</p>	
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		<p>challenging. This takes into consideration that whilst a five year land supply against this target can be demonstrated, there is a lack of any currently identified specific supply in the last ten years of the period. It notes (paragraph 7.11) that work on the Local Plan will seek to identify sites for development up to 2036 and will indicate whether this level of need can be accommodated. Aside from the total numbers, an additional challenge identified within the report is that there is a continued, very substantial need to secure additional affordable housing, with the results of the SHMA, showing that there is a need for 406 affordable dwellings per annum. It also points out that when asking the question “are (housing) policies fulfilling their purpose?” specifically referring to ‘ensuring a mix of housing in Reading and avoiding dominance of small units and flats,’ the largest proportion of new permissions are still flats rather than houses, and are smaller rather than larger units. This is not surprising given that the vast majority of new homes permitted since 2013 are changes of use, many of which are not subject to the need to apply for planning permission due to Permitted Development rights. The findings demonstrate that there are considerable challenges in delivering larger, family sized houses in the Borough. These issues have influenced the proposed schemes presented for pre-application discussions with RBC, with the homes proposed being family sized houses (not flats) with a mix of terraced house, semi-detached houses and detached houses. In addition to the above, we are concerned that the current strategy does not provide a solid foundation for meeting housing needs within Reading Borough. The Duty to Cooperate Statement includes a Memorandum of Understanding in relation to Reading’s unmet housing need. It is anticipated that the unmet need would be accommodated within Wokingham Borough or West Berkshire, however, they are at an earlier stage of plan making and there is no firm commitment that this need can or will be accommodated. The MoU only confirms that the need ‘should’ be met within the Housing Market Area (para 2.1 (B)). This is not considered to be a sound approach to housing delivery and the duty to cooperate.</p>	
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		<p>Furthermore, Wokingham Borough is constrained by green belt to the east and West Berkshire is largely constrained by the North Downs Area of Outstanding Natural Beauty (AONB). Within Berkshire, Reading is therefore the most sustainable location to provide housing to meet the needs of the HMA. The provision of housing within sustainable locations is a core principle of the NPPF (paragraph 17). We believe it is critical that the Council reviews sites within the boundary of Reading that could sustainably contribute to the housing land supply in the Borough, such as Caversham Park. We therefore consider that the Council is placing too much certainty on the potential for neighbouring authorities to accommodate the unmet need. The Caversham Park site offers an opportunity to provide additional housing within the boundaries of Reading Borough. This provides greater certainty over the delivery of housing and ensures that Reading Borough has gone as far as possible to meet its own housing requirements. The Housing White Paper (Feb 2017) set out a number of objectives for supporting housing growth; making efficient use of developable land, providing homes within the right locations, removing delays with the delivery of homes and providing the right types of homes to suit the community. Following the Autumn Budget 2017 it is clear that the Government's priority remains the delivery of housing at pace and at scale in response to the housing crisis. The Housing White Paper proposes changes to the NPPF to support propositions that would maximise density on underused sites. Specifically, a proposal at the Caversham Park site would meet the following objectives:</p> <ul style="list-style-type: none"> • Make efficient use of land within the Borough boundaries to reduce the reliance on adjacent authorities to deliver the housing requirement • Address the identified mix of housing needs within RBC, at a density that reflects the site's location whilst acknowledging the importance of the heritage assets • Ensure that the density and form of development reflect the character, accessibility and infrastructure capacity of an area. 	
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		<p>Importantly, the Housing White Paper states that the NPPF will be amended to make it clear that plan should “take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives.” Technical due diligence has been undertaken on the site and there have been pre-application meetings in relation to new build development proposals. It is clear from these discussions that there is a way forward for a design solution that would respect the heritage and landscape character of the site, whilst accommodating some new build development. These issues will be explored further through the planning application process and we are confident that a viable, deliverable and sensitive solution will be achieved. It is therefore critical that the underpinning policy positive for the site neither inhibits the principle of increasing density nor the flexibility for the design to consider a range of options for the site to deliver a viable mixed use development proposal that respects the site’s constraints and delivers housing for the Borough. The intention with this representation on the Draft Local Plan is to recognise Caversham Park (north of the Grade II Listed Caversham House and well away from any of the views towards the limited remaining parts of the landscaped garden laid out by Capability Brown) as a site suitable for delivery of new homes ‘over and beyond the conversion of the main house and limited new build on previously developed land.’ This submission also recognises that Policy needs to be realistic around protection of the historic significance of the site given that the main house has been substantively altered over the years of occupation by the BBC. The grounds in the condition that they are in; including the remnants of the garden laid out by Capability Brown are poorly configured, poorly documented (with no records available for the original layout designed for an earlier house that no longer exists) are hard to read and understand; particularly in respect of the land to the north of the current main house, here new housing could be developed. The sections of the historic park and garden which retain the most historic value are south of the main house. If the Policy needs to restrict and or prevent additional development over and above the conversion</p>	
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		<p>of the main house, this should specifically relate to sections of the grounds south of the main house.</p> <p><u>Suggested wording:</u> “Caversham Park and Caversham Park House are key features of the heritage and landscape of Reading. Caversham Park is a Registered Historic Park and Garden, and the site contains a number of listed features. These assets will be conserved. The significance and setting of all heritage assets on the site needs to be assessed to conserve the site in a manner appropriate to its significance. Conversion of the house from offices to residential, Hotel, Retirement Accommodation or other suitable use compatible with its heritage and/or a cultural, community or heritage use will be acceptable if it sustains the significance of the listed building. It is estimated that up to 40-45 dwellings could be accommodated but The exact figure will however be dependent on more detailed historic assessment of the building and the precise mix of uses. Any development or conversion proposals should open as much of the park as possible to public access including reinstatement of historic public footpaths. This policy does not allocate the site for Any additional development over and above conversion of the house will need to be designed in a layout, type and form that is sensitive towards the settings of the Listed Buildings on the site and to the remnants of the historic Park and Garden. There may be scope for some limited development on previously developed land within the site, which will need to be justified at application stage. Such development must comply with the criteria below:</p> <ul style="list-style-type: none"> • No development will cause substantial harm to the historic interest or the important landscape value of the site. • Development will not detrimentally affect significant protected trees of areas of biodiversity importance. <p>Should the inspector address policy CA2 in detail, we would like to appear in person to discuss the representation.</p>	
Berkshire	Policy CA2	We do not believe Policy CA2 is sound. The registered status of the	No change proposed. It is not clear how any of

Gardens Trust		designated garden landscape at Caversham Court is not referenced in the main text (8.1.5). It is not clear whether or not all of this site is within the “historic cluster” radiating out from central Caversham (Fig 8.1). This contrasts with a specific reference to the “listed manor house” (8.1.5) and to Caversham Park as a registered Historic Park and Garden (CA2 and Fig 8.1). The registered status of the designated garden landscape at Caversham Court should be referenced in para 8.1.5 and explicitly covered by Figure 8.1.	these comments relate to the soundness of policy CA2, which is about Caversham Park. Paragraph 8.1.5 already refers to Caversham Court as a historic garden. The purpose of figure 8.1 is to show the general location of a cluster, not to set out a specific boundary, which would then be substantially misinterpreted as meaning that things outside the boundary have no historic significance. Figure 8.1 is a general strategy, not a proposals map. The Proposals Map shows the boundaries of registered parks and gardens.
Historic England	Policy CA2	Policy CA2 - Historic England has no objection to Policy CA2 and, indeed, welcomes the commitments and requirements in the policy, particularly the presumption against any development on the current undeveloped areas of the Park, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework. We suggest, however, omitting the reference to the indicative potential for the number of dwellings as our experience shows that the higher number becomes the target, notwithstanding the caveat in the policy that the figure will be dependent on more detailed historic assessment of the building.	No change proposed. Dwelling numbers are mainly included as targets for monitoring, and the text makes clear that more detailed assessment may lead to a different conclusion.
Lawson, Ian	Policy CA2	CA2 discusses the development of Caversham Park. The site was once the location of a private school before the BBC took over. It is well known that the Chiltern College at 18 Peppard Rd are looking to redevelop their nursery facility. It might be possible to relocate the college to Caversham park in order to allow development of the college site. There is also the school (870/6009) which is now operating at capacity which could benefit from a larger site if it were offered. Such a move over time would benefit the community an offer a positive use for the site. In both cases, the need for a third river crossing would have to be completed before any new housing were to be approved for	Change proposed. The policy for Caversham Park already includes the possibility of use of the building for community uses (which would cover education), but this should be expanded to include other uses compatible with its heritage.

		Caversham and Emmer Green. The following modification should be made: allow Caversham Park as a private school.	
Sport England	Policy CA2	CA2: Caversham Park – Sport England is pleased to support this policy now since our comments on the draft Local Plan have been included.	Noted. No change needed.
Historic England	Paragraphs 8.3.6, 8.3.8-8.3.11	Paragraphs 8.3.6, 8.3.8 – 8.3.11 - Historic England welcomes paragraphs 8.3.6 and 8.3.8 – 8.3.11 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Paragraph 9.1.4	Paragraph 9.1.4 - Historic England welcomes paragraph 9.1.4 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Paragraph 9.2.1	Paragraph 9.2.1. - Historic England welcomes key principle d in paragraph 9.2.1 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework, although we would prefer it to be “conserved and enhanced”.	Noted. No change needed.
Historic England	Paragraphs 9.2.3 and 9.2.6	Paragraphs 9.2.3 and 9.2.6 - Historic England welcomes paragraphs 9.2.3 and 9.2.6 as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy ER1b	Policy ER1b - Historic England welcomes the requirement in Policy ER1b for development to retain the locally-listed building and enhance its setting as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy ER1c	Policy ER1c - Historic England welcomes the requirements in Policy ER1c for development to make a positive contribution to the conservation area and setting of adjacent listed buildings and to take account of	Noted. No change needed.

		potential archaeological significance, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	
University of Reading	Policy ER1c	<p>Redlands Road – The site to the rear of numbers 8-26 has been previously promoted to have an indicative capacity of 20 dwellings at 30dph, citing its central, sustainable location for development and availability in the short term. The site is highly accessible with access by sustainable modes to many services and facilities.</p> <p>Policy ER1c: Whilst the University supports the inclusion of the Redlands Road site as a draft allocation, with the significant housing shortfall (644 dwellings) over the Plan period and the ability of this site to potentially accommodate a greater number, it is recommended that the Council amend the indicative capacity of the site up to 20 dwellings. As stated previously but not picked up by the Council’s latest draft wording for Policy ER1c, the University wish to have the flexibility to utilise the site for educational purposes.</p>	<p>No change proposed.</p> <p>The site was assessed through the Housing and Economic Land Availability Assessment, and the capacity is based on that analysis. However, should a proposal demonstrate that an alternative number of dwellings is appropriate, the dwelling range should not act as an impediment, and this is reflected in the supporting text.</p> <p>The supporting text in paragraph 9.3.4 recognises the potential for sites to be used for community use including education.</p>
Historic England	Policy ER1d	Policy ER1d - Historic England welcomes the requirements in Policy ER1d for development to make a positive contribution to the conservation area and to take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy ER1e	Policy ER1e - Historic England welcomes the requirements in Policy ER1e for development to retain the locally-listed building and enhance its setting and to take account of potential archaeological significance, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
University of Reading	Policy ER1e	St Patrick’s Hall – St Patrick’s Hall is an existing area which provides student accommodation a short distances to the west of the University of Reading. It is a highly sustainable location with convenient access to	No change proposed. As set out in the policy, the level of additional bedspaces proposed is indicative. It has emerged from consideration of

		<p>nearby services, facilities and the main University campus. A planning application referenced 172045 was submitted in Nov 2017 by UPP Projects Ltd for the redevelopment of the site to accommodate 872 new student bedroom and ancillary services and facilities. The application is currently under consideration but reflects a more accurate capacity for the site.</p> <p>Policy ER1e: The University supports the inclusion of this Policy, however, consider the indicative capacity for the site is too low. It is proposed that the indicative number of student bed spaces be increased to 800-900.</p>	<p>the recent applications for development at the St Patrick's Hall site. It will be for an applicant to demonstrate how a greater number is appropriate in the context of the characteristics of the site. It is important to note that planning application reference 172045 was refused on 23rd February due to harm to the character and amenity of the surrounding area and due to leading to unacceptable parking impact on surrounding streets.</p>
University of Reading and UPP	ER1e: St Patricks Hall	<p>We have recently submitted an application on behalf of the University of Reading and University Partnerships Programme (UPP), for the redevelopment of St Patrick's Hall, Northcourt Avenue for 884 new student bedrooms with associated catering and social facilities (ref no. 172045). UPP has worked in partnership with the University since 2001 and now operates all of the University accommodation on campus, taking responsibility for the cleaning, maintenance, refuse and recycling on behalf of the University. Policy ER1 identified site for development in east Reading. Policy ER1 part (e) (St Patrick's Hall, Northcourt Avenue) requires development to intensify the provision of student accommodation on site, with retention of locally-listed Pearson's Court. The site size is noted as being 3.39ha with a net gain of approximately 450-500 bedspaces required. It states that development should:</p> <ul style="list-style-type: none"> • Retain the locally-listed building and additional development should enhance its setting; • Take account of potential archaeological significance; • Avoid adverse effects on important trees including those protected by TPO; • Take account of the potential for biodiversity interest, including bats; • Enhance the green link across the northern boundary of the site; and • Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make 	<p>No change proposed. As set out in the policy, the level of additional bedspaces proposed is indicative. It has emerged from consideration of the recent applications for development at the St Patrick's Hall site. It will be for an applicant to demonstrate how a greater number is appropriate in the context of the characteristics of the site. It is important to note that planning application reference 172045 was refused on 23rd February due to harm to the character and amenity of the surrounding area and due to leading to unacceptable parking impact on surrounding streets.</p> <p>In terms of need for new student accommodation, this is looked at in more detail in the Local Plan Background Paper. However, it is not agreed that, given the extent of the University's ownerships, the needs for new space all need to be met on this one site.</p> <p>The Council never worked on the basis that a</p>

		<p>provision for upgrades where required.</p> <p>It should be acknowledged that the supporting text to the policy states that the capacity of the sites will ultimately depend on various factors that will need to be addressed at application stage, including detailed design and layout. Thus, the proposed 450-500 bedspaces outlined in the policy is purely indicative and as the supporting text correctly identifies, the capacity would need to be addressed at application stage.</p> <p>The need for student accommodation at St Patricks Hall - In this regard, we would highlight that the University of Reading is a growing institution with recent increases in full-time student numbers far outstripping those seen at national levels. This is reiterated in the recently submitted Demand and Impact Assessment with application ref no. 172045 which is also appended to this letter for reference. Of particular note is that:</p> <ul style="list-style-type: none"> • The University has grown full-time student numbers by 18% over the last five years, increasing the demand for accommodation bedspaces. • There has been a 59% increase in the number of students aged 20 or under over this period, with University accommodation allowing the institution to offer good levels of pastoral care and eliminate the behavioural impacts of young students in the local community. • The University has increased non-UK students by 49% over the last five years and there is a need to deliver on campus accommodation to suit their particular needs. • Private purpose-built accommodation is expensive and does not solve the problem – 98% of Reading’s existing on campus accommodation is priced below even the least expensive bedspace at CityBlock, Reading’s newest student development. • Reading has seen a 16% increase in the number of students living in HMOs over the last five years, double the national average increase of 8%. • Reading Borough Council’s own research (HMO Article 4 Review 	<p>policy allocating this site would simply reflect the number of additional bedspaces in the original planning application, and it is not clear where this impression comes from. The first working draft of the Local Plan allocation was based on retention of Pearson’s Court.</p>
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		<p>2015) shows that the growing student population is 'having deleterious impacts on local residential areas'.</p> <ul style="list-style-type: none"> • Rising demand has not been met within the city as there has been a reduction in HMO licenses granted between 2012 and 2017. The effect of this is a reduction in lower quartile rental opportunities. This further advocates increased, more affordable accommodation, at the University campuses. <p>The University of Reading is growing, and it is vital that this growth is matched in terms of the provision of quality student accommodation within easy access of the main campus. The University has had waiting list in excess of 700 bedspaces made up of undergraduates and postgraduates. In 2017, the University also had to enter into nomination agreements with local accommodation providers to provide accommodation for their students. This undersupply of accommodation is driving the University to provide more accommodation to manage its growth. If not resolved, this deficit will generate a new and challenging demand on the town's private rental sector and negatively impact on the University's ability to attract the best students from the UK and around the world. The redevelopment of St Patrick's Hall is the next logical opportunity to increase the provision of student accommodation in a sustainable location close to the main University campus.</p> <p>Assumptions behind ER1e - With regard to the capacity of the site for student accommodation, the draft policy refers to a site area of 3.39ha and approximately 450-500 bedspaces. The site area of the submitted planning application is slightly larger at 3.6 ha. This accounts for a small difference in the amount of accommodation between the proposed allocation and the submitted application. In terms of the bedspace numbers, as we understand it, the draft policy did originally intend to propose bedspace numbers in line with the originally submitted application (ref. 161182) that proposed to demolish Pearson's Court, i.e. between 800-900 beds. Once it was established that the Council wished to retain Pearson's Court and the original planning application was</p>	
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		<p>withdrawn, it is our understanding that the policy numbers were reduced (as now published) to take out the new build bedspaces lost through the retention of Pearson’s Court. What the draft policy didn’t recognise is that there are further opportunities to make up the shortfall in accommodation from the withdrawn scheme through the provision of additional new build accommodation elsewhere at the site. As demonstrated by the submission of the current planning application (ref. 172045) it is still possible to achieve between 800-900 bedspaces with the retention of Pearson’s Court. The current application demonstrates that higher bedspace numbers can be maintained whilst still meeting the environmental requirements of draft policy ER1 part (e); namely the retention of Pearson’s Court, archaeological interests, avoiding undue impact upon TPO trees, taking into account the interests of bats and the green link and ensuring an appropriate water and wastewater strategy. All of these draft policy requirements are appropriately addressed by the submitted application.</p> <p>Conclusion - It has been demonstrated through the current application (ref. 172045) at St Patrick’s Hall that the site can accommodate a net increase of 884 bedspaces, whilst maintaining the environmental requirements of draft Policy ER1 part (e). On this basis, it is requested that the policy is amended to refer to a site area of 3.6 hectares and a net gain of approximately 800-900 bedspaces.</p> <p>The need for student accommodation has been evidenced by the enclosed demand and impact assessment. It is imperative that the St Patrick’s Hall site, a brownfield site where student accommodation has been provided for over 100 years, is redeveloped making efficient use of finite land available in sustainable locations in close proximity to the University campus.</p>	
Wokingham Borough Council	Policy ER1e	In regard to site allocation ER1e, Wokingham Borough Council requests that it is consulted when a planning application is submitted regarding any cross boundary impacts that development may have.	Noted. No change needed.
Blades, Victoria	ER1f: Hamilton	If this site was put forward for development, access would need to be	No change proposed. The policy specifies that all

	Centre, Bulmershe Road	addressed at the top of Bulmershe/Hamilton – as currently a nightmare with parking, especially for the safety of the children attending the 3 schools on Crescent Road. Also parking would need to be addressed as currently not enough on street parking. Garden/recreational space would have to be considered carefully, as taking a slice of the school playing field is not an acceptable option. Disagree with this site for inclusion in the plan.	parking should be provided in off-street locations. The dwelling range specified has been determined on the basis of densities which should still allow some on-site private or communal outdoor space, and will not require use of the protected open space.
Wokingham Borough Council	Policy ER1f	In regard to site allocation ER1f, Wokingham Borough Council requests that it is consulted when a planning application is submitted regarding any cross boundary impacts that development may have.	Noted. No change needed.
Historic England	Policy ER1g	Policy ER1g - Historic England welcomes the requirement in Policy ER1g for development to take account of potential archaeological significance as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Arthur Hill Save Our Swimming CIC	ER1h: Arthur Hill Swimming Pool, 221-225 Kings Road	Arthur Hill Save Our Swimming Community Interest Company would like to make the following comments in response to the Pre-Submission Draft Local Plan published by Reading Borough Council. On 14 June 2017 we wrote to Reading Borough Council to make a number of points in relation to the Arthur Hill Pool site at 221-225 London Road, RG1 4LS. We opposed development on the site for housing purposes as was proposed in the Draft Local Plan. A petition with around 600 written and electronic signatories opposing development on the site was presented to the Council's Policy Committee meeting on 17 July 2017 (electronic version online at https://www.change.org/p/reading-borough-council-keep-the-arthur-hill-site-for-community-use). We are disappointed, but not at all surprised, that Reading Borough Council has apparently ignored these submissions and has retained the proposal for housing development on the Arthur Hill site un-amended in the Pre-Submission Draft. We would therefore like to once again repeat our original objection to development of the Arthur Hill site and make the following points: The company wishes to OBJECT to the proposal to change the land use category of the Arthur Hill site to allow residential	No change proposed. It was agreed to close Arthur Hill at Policy Committee on 26 th September 2016, as a budget saving in view of the prohibitively high costs of bringing it up to standard. An Expression of Interest under the Community Right to Challenge was rejected at Policy Committee on 10 th April 2017. There is no realistic prospect of the site being used for continued swimming use, and a replacement is proposed at Palmer Park. The site is narrow and constrained, and, with provision proposed elsewhere, is an opportunity for residential development. The building is locally listed, and the frontage does make a positive contribution to the streetscene and should be retained.

	<p>development (Policy ER1h, page 208). We remind the Council that the Arthur Hill site was donated to the local community for the benefit of the general public, and it is not appropriate for the Council to sell the site for private development. We request that policy ER1h and all references to the Arthur Hill site be deleted from the Local Plan. The current land use for the site should be retained, and the site should continue to be used for leisure, sporting and community activities. We do not support the local listing of the frontage to the Arthur Hill Pool building at the current point in time. The external features of the building have limited heritage value and it is the internal arrangement of the pool, with cubicles surrounding the main pool, which gives the building its appeal and makes it attractive to particular use groups, such as swimmers with disabilities. We also consider that the proposal to build between six and ten dwellings on the site would alter the character of the local neighbourhood and would add unacceptably to noise, traffic nuisance and parking problems in Norwood Road and Rupert Street. We consider that at this point in time options for the future of the Arthur Hill site should be kept as open as possible, and actions which might constrain the future of the site should be avoided. We would like to point out that the proposed development of a new swimming pool in Palmer Park (Policy ER1) would contravene current Council policies for development on public open space, and no proposals are made for an equivalent area of land to be provided as new open space locally in compensation for loss of space in Palmer Park. No effort has been made to work with neighbouring authorities to consider alternative sites or options for provision of a new swimming pool. Given that comments made in previous rounds of consultation over the Local Plan have not been taken into account in preparation of the Pre-Submission draft, we consider that the Local Plan is NOT legally compliant, is NOT sound and does NOT fulfil the duty to co-operate. We wish to make further representations during the public examination of the Local Plan and wish to appear in person at the public examination. Please keep us informed of arrangements for consultation and</p>	<p>It is not agreed that a development of the scale proposed would adversely affect the character of the street. The adjacent residential buildings are 4 and 7 storeys (including basement). The proposal would not appear substantially larger than the current building from the street.</p> <p>The Local Plan as proposed does not identify any land on existing open space for a pool at Palmer Park. The area shown consists of the car park and existing buildings. Seeking sites outside Reading for a new pool is not considered to be an appropriate solution when there is a potential site available within the Borough.</p> <p>It is not clear how the proposal fails the duty to co-operate.</p>
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		examination of future drafts of the Local Plan. We reserve the right to raise further objections on wider grounds at future stages of the planning process. Please do not hesitate to contact me if you require any further information or have any questions.	
Historic England	Policy ER1h	Policy ER1h - Historic England welcomes the requirement in Policy ER1h for development to avoid an adverse impact on the setting of nearby listed buildings as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy ER1i	Policy ER1i - Historic England welcomes the requirements for development in Policy ER1i to make a positive contribution to the setting of the registered historic park at Reading Cemetery and to take account of potential archaeological significance, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Historic England	Policy ER1j	Policy ER1j - Historic England welcomes the requirements in Policy ER1j for development to ensure that there is not adverse impact on the monument and to take account of potential archaeological significance, as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Berkshire Gardens Trust	Policy ER2	We do not believe Policy ER2 is sound. The historic value and registered status of the Whiteknights Campus designed landscape is not referred to in this section. Although there are references to Reading cemetery being a registered historic garden, Palmer Park as one of the town's main green spaces and also to Georgian, Victorian heritage and conservation areas (9.1.4), these are not explicitly outlined in Figure 9.1. The historic value and registered status of the Whiteknights Campus designed landscape should be explicitly referred to in Section 9 and Policy ER2. Reading cemetery and Palmer Park should be explicitly outlined in Figure 9.1 as well as the clusters of Georgian, Victorian heritage and	No change needed. Whiteknights Park is not a registered park and garden, so such a reference would be inaccurate. The purpose of figure 9.1 is not to identify specific heritage. It is a general strategy, not a proposals map. Registered parks and gardens and conservation areas are shown on the Proposals Map.

		conservation areas.	
Studios Construction (Reading) Ltd	Policy ER2	ER2: Whiteknights Campus, University of Reading - Whilst not explicit within draft policy ER2, as this relates specifically to the main Campus for the University, it is considered that in accordance with the aforementioned draft policy H12, the Whiteknights Campus will be the focus for future student accommodation. However, draft policy ER2 comments on a number of constraints associated with the Campus, at paragraph 9.3.9: "The site is on the site of the 19th century Whiteknights Park, and includes a significant amount of parkland, woodland and lakes. Its attractive surroundings are part of the pull of the university, but also offer a number of constraints to development. Parts of the site have significant wildlife importance, and the area is a prominent part of the local landscape...A number of listed buildings are on site, and the campus is surrounded by residential areas." Based on the above overview of the University's main Campus therefore, it would appear that there are constraints to the apparent focus of emerging policies H12, OU1 and ER2 to largely restrict all related development of the scale that will be required to the Campus itself. It is considered that in line with the directions of draft policies H12 and OU1, this restricts the ability of the University to expand. Our client further notes that paragraph 9.3.9 states approximately two thirds of the Campus is within Wokingham Borough "...meaning that a consistent approach is required". This is considered in more detail within Section 3.	No change proposed. The Whiteknights Campus has some constraints, but it is also an extremely extensive site at 120 ha, and the constraints do not apply across the board. Development on the campus has been undertaken in recent years, is currently underway, and is expected to continue during the plan period. The Council has no reason to believe that the potential of the site has been exhausted. In addition, the Whiteknights Campus is not the only location in existing university or student accommodation use across Reading.
University of Reading	Policy ER2	Policy ER2: The University supports the inclusion of this Policy but considers the inclusion of the second paragraph in its current form would render it unsound. This policy should be changed to reflect changes recommended to H12 as follows: "Provision of new student accommodation on the Whiteknights Campus, or as a reconfiguration or extension of nearby dedicated accommodation, <u>or in other sustainable locations with convenient access via walking, cycling or public transport modes, to services, facilities and places of study,</u> will therefore be acceptable subject to other policies in the Plan." Within previous representations on behalf of the University, it was suggested that the	No change proposed. In line with the responses to representations on H12, it is not considered that the policy should be expanded to endorse student accommodation on other sites. It is considered that the criterion should still refer to "amenity", rather than "general amenities", which would have a different meaning.

		third bullet of Policy ER2 be amended to the following, this recommendation is maintained: “There will be no significant detrimental <u>impact upon the general amenities</u> of neighbouring residential properties.”	
Wokingham Borough Council	Policy ER2	Whiteknights Campus – Policy ER2 supports the continued evolution and development of the University of Reading campus, and includes a set of criteria which future development will accord with. The proposed policy in the Plan is similar to the Whiteknights Campus policy within WBC’s Managing Development Delivery Local Plan. WBC and RBC should continue to work together to ensure a consistent approach to development within the Whiteknights Campus.	Noted. No change needed. Discussions around this issue will continue under the duty to co-operate.
Bracknell Forest Council	Policy ER3	Health – Bracknell Forest Council is pleased that concerns over the wording of the third paragraph in Policy ER3, which stated that “would be supported where it would ensure that such a move would enhance its accessibility to Reading residents...” has been amended to include ... “and the rest of its catchment.”	Noted. No change needed.
Historic England	Policy ER3	Policy ER3 - Historic England welcomes the requirements in Policy ER3 for development to conserve the listed main block on London Road and 17 Craven Road, ensure that their use is consistent with its conservation and not to result in adverse effects on the setting of listed buildings and conservation areas as part of the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.	Noted. No change needed.
Wokingham Borough Council	Policy ER3	Royal Berkshire Hospital – ER3 is a flexible policy which supports the future development of the site for healthcare provision. WBC notes that within policy ER3 there is reference to a potential long-term proposal for moving the hospital to a new site within the Reading area. The RBH serves residents across Berkshire and beyond, and therefore WBC requests that it is engaged with should any plans come forward to relocate the hospital. If the hospital does relocate in the future, there could be an opportunity for the site to be redeveloped to provide	Noted. No change needed.

		residential development, which could contribute towards meeting the wider needs of the Western Berkshire HMA. The site is not currently within Reading Borough Council's assessed housing capacity.	
Gladman Developments	Policy CA1	<p>Policy CA1 – unsound (Positively prepared, justified, consistent with National Policy). Gladman wish to submit the Land off Peppard Road, Emmer Green for consideration through the plan-making process. The site is located adjacent to the urban area of Reading but is located wholly within the administrative boundary of South Oxfordshire District. The site should be considered through the plan making process as a strategic growth location that relates to Reading. It therefore presents an opportunity to accommodate the unmet needs of Reading in a sustainable location alongside the administrative boundary of the Borough. Whilst it is not the role of the Local Plan to allocate land outside of its administrative boundary, it would be appropriate to consider this site as a strategic location to meet unmet housing need, much like Grazeley within the Wokingham and West Berkshire administrative areas. The site comprises 13.48 hectares adjacent to existing residential development at Emmer Green, Reading, in the Parish of Eye and Dunsden in South Oxfordshire. The site comprises three fields currently in agricultural use. It is well contained within the landscape and important trees and other landscape features would be retained. The local highway network has capacity to accommodate the additional traffic associated with the development of the site without adverse impact. There is an existing public right of way that crosses the southern part of the site linking Peppard Road with Kiln Road which will be retained and enhanced. The site has a low ecological value and any loss of habitat would not be significant; mitigation and net biodiversity gains can be readily achieved. There are no designated heritage assets within or immediately adjacent and would not adversely affect the setting of any listed building. The site has the capacity to accommodate approximately 245 dwellings. This site is suitable, deliverable and viable. A Development Framework is included with this representation. Emmer Green has a wide range of local services and facilities which are within</p>	<p>No change proposed</p> <p>This land is not within Reading Borough, and it is not within the remit of the Local Plan to allocate it, particularly when it is not identified in the Final Publication South Oxfordshire Local Plan. A planning application on the site, to which the Council objected, was recently refused, and we await the appeal outcome. The situation is different to Grazeley and other potential areas within the Western Berkshire HMA, in that the authorities are actively working together to explore these options and are still to bring forward Local Plans to consider these issues. The Reading Borough Local Plan does not include these potential developments in order to advocate them, but so that the plan can take account of infrastructure provision, transport links etc, where it is considered possible that adjoining Local Plans may propose them.</p> <p>The Council does not consider that the northern edge of Reading is the appropriate location to meet Reading's housing needs. Instead, it has agreed a Memorandum of Understanding with the Western Berkshire HMA authorities that seeks to deal with that unmet need.</p> <p>Although it does not form part of Reading's Local Plan strategy, the Sustainability Appraisal has</p>

		<p>easy walking and cycling distance of the site including schools, supermarket, post office, pharmacy, playing fields and allotments. Indeed, policy RC1 identifies Emmer Green as a District Centre. Furthermore, the Plan introduces a strategy for the areas of Caversham and Emmer Green which includes key transport measures that include the introduction of park and ride facilities. Emmer Green has excellent bus services to Reading town centre, Caversham and Sonning Common which pass the site. Local services are available in Caversham and Sonning Common and the buss from the site to central Reading is approx. 15 min. Reading is a major service centre with significant employment opportunities and is a key hub for the Thames Valley. Reading Station provides frequent services to London. Gladman is fully committed to bringing forward this site for development at the earliest opportunity and its application for up to 245 dwellings was validated by South Oxfordshire District Council in November 2016. However, the application was refused at Planning Committee in Sept 2017, despite receiving a recommendation for approval by the Case Officer. Gladman submitted an appeal against the refusal of planning permission and the application is to be heard by way of Public Inquiry between the dates of 1st-4th May 2018. We would like to appear in person at the examination.</p>	<p>nonetheless assessed broad locations for urban extensions, and has not considered this to be a particularly appropriate location.</p>
<p>Phillimore Successor's Settlement Trustees</p>	<p>Other site</p>	<p>We write on behalf of the Trustees of the Phillimore Successor's Settlement who own part of the Coppid Hall Estate. Land owned by the Trustees at Playhatch lies within South Oxfordshire District but adjoins the urban area of Reading. We do not believe the Local Plan is sound. We wish to appear in person at the public examination in order to enable a full and proper discussion of the issues raised. In accordance with the requirements of the NPPF, the RBC Local Plan must meet its objectively assessed housing need (OAN) in full, by identifying land for 699 homes per annum as a minimum. The Council contends that it is unable to meet this requirement in full as it is a tightly constrained, urban Borough. As such the level of housing proposed within the Pre-Submission Draft Plan is only 671 dpa, leaving a shortfall over the Plan period of 644 dwellings. The Council proposes to work with</p>	<p>No change proposed</p> <p>This land is not within Reading Borough, and it is not within the remit of the Local Plan to allocate it, particularly when it is not identified in the Final Publication South Oxfordshire Local Plan. The situation is different to Grazeley and other potential areas within the Western Berkshire HMA, in that the authorities are actively working together to explore these options and are still to bring forward Local Plans to consider these issues. The Reading Borough Local Plan does not include these potential developments in order to</p>

		<p>neighbouring Authorities in the Western Housing Market Area (HMA) to provide for this need. However, the Berkshire SHMA recognises that parts of South Oxfordshire also fall within the Western HMA and that the influence of Reading, economically and in terms of local housing demand, extends into South Oxfordshire. It is encouraging that the Pre-Submission draft Plan acknowledges, at footnote 15, that “notably areas of South Oxfordshire around Henley-on-Thames and Sonning Common...functionally form part of the Western Berkshire HMA.” However, despite acknowledging this, the Plan then neglects any discussion of how this need might be met “for practical planning purposes.” This is a significant omission. Rather, in recognition of the functional relationship with South Oxfordshire and in seeking to meet Reading’s unmet housing need, the Plan should express support for development proposals on the edge of the urban area, but within South Oxfordshire District (this would mirror the approach that the Plan takes towards supporting significant levels of development at Grazeley, which lies within Wokingham Borough and West Berkshire Councils). Indeed, this approach would result in more sustainable patterns of development in accordance with national policy, and so the Plan should support land adjoining the urban area of Reading at Playhatch for the following reasons: - The site adjoins the urban area of Reading and is within close proximity of the services and facilities (including employment, leisure, retail, educational) within the town. The edge of urban location provides the opportunity to deliver family homes, a type of housing for which the Plan acknowledges a pressing need and admits that it would be difficult to deliver elsewhere within the Borough (paragraph 3.1.4). – The Draft Plan proposes the provision of Park and Ride facilities along the A4155 corridor (Policy TR2: Major Transport Projects, paragraph 8.2.1(c), Figures 4.8 and 8.1). This reflects the sustainable location of the site, along a key transport corridor, and would further enhance the sustainability of our clients land. The proposals for Park and Ride in this location are supported. – The Draft plan refers to the potential for a third Thames Crossing in the vicinity of our clients land (e.g. Policy TR2:</p>	<p>advocate them, but so that the plan can take account of infrastructure provision, transport links etc, where it is considered possible that adjoining Local Plans may propose them.</p> <p>The Council does not consider that the northern edge of Reading is the appropriate location to meet Reading’s housing needs. Instead, it has agreed a Memorandum of Understanding with the Western Berkshire HMA authorities that seeks to deal with that unmet need.</p> <p>Although it does not form part of Reading’s Local Plan strategy, the Sustainability Appraisal has nonetheless assessed broad locations for urban extensions, and has not considered this to be a particularly appropriate location.</p> <p>The provision of park and ride and an additional Thames Crossing, whilst they would be essential to allow any such scheme as proposed to go ahead, are proposed to deal with existing transport issues rather than to enable substantial additional development outside Reading. It is not agreed that the Council is citing infrastructure issues to avoid meeting its needs in full, and it should be noted that if Reading’s unmet need were accommodated on this site, Reading would still not be meeting its needs in full, as it is outside the Borough.</p>
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		<p>Major Transport Projects, and Figure 4.8). In fact, the Strategic Outline Business Case for the proposed crossing has been published and concluded that a two lane crossing would deliver a ‘benefit to cost ratio’ (BCR) of 2.72, which represents a very high value for money when compared to Department for Transport guidance. Further, the Strategic Outline Business Case finds that an additional crossing would enhance the connectivity of the area and support economic growth. Its provision would therefore support many of the wider objectives of the Local Plan. Paragraph 8.2.5 of the Plan recognises that the adequacy of infrastructure to support additional development in the Caversham/Emmer Green area is a concern, with particular reference to transport infrastructure. However, the Council will be aware that the need to provide infrastructure is not a reason to plan for less than full OAN (as required by the NPPF). In fact, the proposed Park and Ride facility and the new Thames Crossing would further increase the sustainability of our clients land at Playhatch and could offer significant benefits to the Borough as a whole, which are recognised in the draft Plan: “An additional crossing could result in measures to increase public transport capacity on existing crossings, which would improve traffic issues. A new park and ride site associated with any additional crossing on the A4155 Henley Road would also help to alleviate issues” (paragraph 8.2.5). In summary, the Trustees wish to support the proposals for a Park and Ride facility on the A4155 corridor, and for a third Thames Crossing in the vicinity of our clients land. However, we object to the omission of reference to the role which development outside, but adjoining, the Borough boundary, at our clients land, could play in meeting the needs of Reading and of the Western HMA (of which land within the South Oxfordshire is functionally part of). The omission of this means that the Plan as currently drafted is ‘unsound’ because it would not be: Positively prepared (based on a strategy which seeks to meet objectively assessed development needs); Justified (the most appropriate strategy when considered against the reasonable alternatives); Effective (based on effective joint working on cross-</p>	
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		boundary strategic priorities); or Consistent with national policy (enabling the delivery of sustainable development).	
Highways England	Figure 10.1	Chapter 10: Implementation – Figure 10.1 shows the indicative timescales for the site proposals that are anticipated to be delivered during the Local Plan period. There appears to be an error in this table. The south Reading site proposals numbers appear to be incorrect as they do not reflect the same site proposal numbers as laid out in Chapter 6. For example, figure 10.1 refers to policy ‘SR2a Former Landfill, Island Road’ however in Chapter 6 this policy is called ‘SR1a Former Landfill, Island Road.’ It is important that the delivery timescale of individual sites are clear especially with site proposals that could impact the SRN.	Agreed. Change proposed. This is an error and should be corrected.
BBOWT	Infrastructure Delivery Plan	The Open Space and Biodiversity strategy contains inadequate detail to guide developers on how to deliver proposals that fulfil Local Policy requirements. For this, a much detailed plan is needed.	Do not agree. Detailed guidance is providing within the policies of the Local Plan.
Bracknell Forest Council	Infrastructure Delivery Plan	Infrastructure –The evolving IDP strategy adopted by Reading Borough Council for the new planned development in the borough and associated infrastructure necessary to support this growth is supported. Bracknell Forest Council welcomes the aim to engage in joint cross boundary arrangements with neighbouring authorities considering major infrastructure projects that space beyond the administrative area, and to secure infrastructure funding via the Thames Valley Berkshire Local Enterprise Partnership (TVBLEP).	Noted. No change needed. These cross-boundary working efforts are continuing.
Environment Agency	Infrastructure Delivery Plan	Infrastructure Delivery Plan <ul style="list-style-type: none"> • We recommend that you mention the potential for flood defence infrastructure. • Thames Water highlight that the total development identified in the sewerage catchment draining to Blakes Lock SPS may cause concern if all developments were to go ahead. They welcome early consultation concerning any proposed development. It is therefore recommended that the local plan embeds a development control policy such as the one we have recommended above to require developers to provide evidence that they have consulted with the 	Do not agree. There is no need for flood defence infrastructure to facilitate growth within the plan period. Partially agree regarding sewerage issues. Change proposed to specifically highlight Blakes Lock SPS and the importance of early consultation. Do not agree that the Open Spaces Strategy is the appropriate place to emphasise ecological enhancement. Change proposed to replace ‘waterways’ with ‘watercourses’.

		<p>sewer undertaker and that capacity will be in place prior to occupation. This is important to avoid potential sewer flooding pollution incidents.</p> <ul style="list-style-type: none"> • Open Spaces Strategy – should have a focus on ecological enhancement • Biodiversity Plan – replace the word ‘waterways’ with ‘watercourses’ 							
Gillotts School	Infrastructure Delivery Plan	<p>We consider that the plan is legally compliant and sound, but does not fulfil the duty to co-operate. On page 32 of the IDP, it states that 38% of the Borough’s secondary pupils cross the Borough’s boundaries to attend school in the surrounding authorities. In 4.7.6, it is identified that a new 6 form entry secondary school is required and in the Infrastructure Delivery Plan, it states the need in addition for the expansion of existing schools to provide 3 additional forms of entry. No pupil place planning data is provided in the plan, and there is no evidence of any cooperation with neighbouring Local Authorities or Academies. Through our own work with RBC, it seems likely that if such an expansion in school places occurs, there is a significant potential for the amount of cross border movement to reduce and so render schools in other Authorities unviable. In addition, given the physical barrier of the River Thames, the location of the new school and the existing schools that will be expanded are crucial to understand the impact on schools in neighbouring authorities. For example, if the new school were to be situated north of the river, it would be likely that one (or more) of the three south-east-Oxfordshire secondary schools (Chiltern Edge – Sonning Common, Gillotts – Henley-on-Thames, Langtree – Woodcote) would become unviable. This is because rolls are falling in the primaries that feed all three secondary schools. Our own modelling, using data provided by OCC, suggests that, even when housing growth is accounted for, there will be significant surplus places across the three schools if they do not also admit pupils from outside Oxfordshire:</p> <table border="1"> <tr> <td>Year of transfer</td> <td>2018</td> <td>2019</td> <td>2020</td> <td>2021</td> <td>2022</td> </tr> </table>	Year of transfer	2018	2019	2020	2021	2022	Change to IDP proposed to provide additional detail regarding cross-boundary pupil movement and pupil place planning. Cooperation with neighbouring authorities is detailed in the Duty to Cooperate Statement. The IDP recognises the need for one new 6FE secondary school in the town centre and the site identification process is underway.
Year of transfer	2018	2019	2020	2021	2022				

		Total surplus places in SE Oxon	14 6	76	129	89	105	106	
		<p>The Local Plan (4.7.6) states that a new secondary school would “ideally be located close to the town centre.” The word “ideally” is insufficient and should be strengthened as locating the school in north Reading would be: (a) detrimental to south-east Oxfordshire schools (meaning the Plan does not fulfil the duty to co-operate), and/or (b) fail to provide sufficient capacity for Reading’s needs, as the vast majority of houses will be built south of the River (see 8.2.3) (meaning the Plan is not adequately planning for sufficient infrastructure), and/or (c) worsen traffic if Reading pupils have to be transported across the River (meaning the Plan is not sustainable). Pupil place planning needs to be undertaken with all the neighbouring Local Authorities to establish accurately: (a) the need for a new secondary provision (b) the location of the secondary provision to meet this need (c) the impact on existing secondary provision in neighbouring Local Authorities. It is not possible to suggest accurate replacement wording for 4.7.6 and the IDP schedule or the IDP itself until the pupil place planning has been completed and the potential locations of additional secondary provision identified. I do not wish to appear in person at the public examination.</p>							
Highways England	Infrastructure Delivery Plan	<p>IDP/Transport Evidence Base – The IDP states that “As part of the Local Plan process, consultants on behalf of RBC modelled the level of development envisaged by the Local Plan to assess the impact of sites identified in the Plan upon the SRN. Further evidence produced for the Local Plan demonstrated that the level of growth proposed during the Plan period can be accommodated with the implementation of the core projects and transport projects specific to the proposed sites for development.” This evidence has not been provided as part of the Pre-Submission Draft Local Plan consultation.</p>						<p>Noted. This modelling has now been finalised and provided to and discussed with Highways England, and forms part of the evidence base.</p>	
Oxfordshire County Council	Infrastructure Delivery Plan	<p>Secondary Education a. The Plan is not effective in that it does not provide sufficient detail to demonstrate that sufficient schools capacity will be provided to meet the demands for places generated by growth, including the extent to</p>						<p>As stated above in response to the Gillots School – Change to IDP proposed to provide additional detail regarding cross-boundary pupil movement and pupil place planning. The IDP recognises the</p>	

		<p>which Reading Borough is relying on schools outside the borough.</p> <p>b. The Plan is ineffective in that the plan text does not rule out the possibility of a new secondary school being location in north Reading</p> <p>Secondary education</p> <p>a. The Plan should be supporting by a paper on existing school capacity and forecasts and clarify in para 4.7.6 the extent to which Reading Borough is relying on schools outside the borough to meet the growth in pupil numbers as well as more detail on the planned additional capacity required.</p> <p>b. Para 4.7.6 should be strengthened to clarify that the site of the proposed new 6FE secondary school will not be in North Reading – delete the word ‘ideally’</p>	<p>need for one new 6FE secondary school in the town centre and the site identification process is underway.</p>
Royal Berkshire Fire and Rescue Service	Infrastructure Delivery Plan	<p><u>General Comments</u></p> <ul style="list-style-type: none"> • Water Supply (page 19) - RBFRS note that any development has a requirement to consider water supply for firefighting operations and recommend the continuance of regular contact with the RBFRS Operational Support and Policy department. • Electricity (page 21) – RBFRS recommend that any new or refurbished electrical supply system be flood protected. <p><u>Fire & Rescue (page 39)</u></p> <p>Strategy: Services are delivered by the Royal Berkshire Fire and Rescue Service (RBFRS) on behalf of Royal Berkshire Fire Authority (RBFA). They have produced a Five Year Integrated Risk Management Plan 2015-2019/21, which includes key projects for the period. RBFRS’s primary role is to deliver effective prevention, protection and emergency response services to reduce community risk. The integrated risk management plan outlines how the Service identify and assess risks and provides high level plans to manage those risks.</p> <p>Existing provision and capacity issues: RBFRS has four fire stations in the Borough, namely Caversham Rd, Wokingham Rd, Whitley Wood and Dee</p>	<p>Do not agree with general comments. It is considered that the IDP is not the appropriate place to require these considerations, as it is not infrastructure provision. All other changes proposed.</p>

		<p>Rd. These provide four emergency fire engines crewed 24/7 by full-time staff. The Whitley Wood station also serves as a training facility. Additionally, the RBFRS headquarters are near J12 of the M4. RBFRS has a response standard of arrival within 10 minutes of a call for 75% of all emergency incidents.</p> <p>Impact of future growth: The location of the existing fire stations is considered adequate with regard to travel times. However, additional development is viewed as likely to increase incident types, including the two highest risks to the public: road traffic collisions and dwelling fires.</p> <p>Priorities for meeting need: It is likely that proposed developments and growth will have an impact on the demand for the Fire Service and may necessitate the provision of additional resources, but the RBFRS has not identified additional capital infrastructure requirements at this time. Designing safety into the built environment including fire prevention, reduces risk and therefore demand on the Fire and Rescue Service. Some of these measures are included in the building regulations but RBFRS also recommends the inclusion of domestic and commercial sprinklers. This may limit the need to alter existing fire service provision in new development areas, thus reducing associated costs for proposed provision. This would also reduce casualties, reduce damage and protect the environment. RBFRS welcome the opportunity to work with the Council and developers to fully discuss the benefits of such systems. A recent review of the fire station locations across the brigade area concluded that the level of service can be improved by relocating the whole-time fire station from Dee Road to a new fire station facility, preferably in Theale. This would improve the level of operational cover toward the west of Berkshire. Until such time as any new fire station is built in Theale, the Dee Road crews and appliance will remain in their current location for the time being. In addition, information from local authorities about future growth patterns to 2036, along with existing demand pressure and analysis of emerging risks are feeding into RBFRS</p>	
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		long term planning. Consideration of where the most effective locations for fire stations are within the area will be kept under review.	
Environment Agency	Section 11	Monitoring Framework: With regard to the 'Area of Biodiversity Action Plan habitat' indicator, rather than having a target of 'No net loss,' there should be a more stretching target for positive gain.	No change proposed. It is not considered that this target would necessarily be deliverable. Whilst biodiversity net gain can be achieved on sites, this would not necessarily result in the specific habitats outlined in the BAP.
Natural England	Section 12: Glossary	<u>Policy:</u> Glossary <u>Legislation/Plan reference:</u> Paragraph 109, 117 and 114 of the NPPF <u>Issue type:</u> Effectiveness <u>Issue:</u> There is no definition of open space or green infrastructure. <u>Solution:</u> Provide definition/examples	Partially agreed. Change proposed. Green infrastructure should be defined in the Glossary. However, the meaning of open space may depend on the context in which it is used, and is best left to the relevant sections
University of Reading	Proposals Map	Proposals Map - The Proposals Map includes areas categorised as areas of biodiversity and green network importance. These areas match with areas of deciduous woodland as recorded within the National Forest Inventory 2014. The University consider the area categorised as important in terms of its biodiversity importance (deciduous woodland) is not fully up-to-date. An area of the categorised area is directly adjacent to the Mackinder halls development at the Whiteknights Campus and therefore includes an area where deciduous woodland habitat of value is not present. This would require a minor reduction in the area considered to be an "area of identified biodiversity interest" on the draft Proposals Map. It is noted that a further area categorised as an "area of identified biodiversity interest" has been included within the draft Proposals Map which was not previously included within the SDPD. This can be found to the east of the Mackinder halls development and east of the small area discussed above which we recommend is removed. The University holds concern regarding the inclusion of this additional area and without evidence supporting this change would be concerned that it would not be justified and therefore in accordance with the NPPF at paragraph 182.	No change needed. We have reviewed the areas shown on the Proposals Map, and it appears that all of those areas adjacent to the Mackinder Halls are still covered in deciduous trees. The area to the east of Mackinder Halls is also clearly deciduous woodland, which qualifies as an area of BAP habitat.
Englefield Estate	Sustainability Appraisal	We welcome the assessment of the SA which finds that strategic growth at Grazeley would offer significant sustainability benefits, such as	Noted. No change needed.

		assisting significantly in ensuring high quality housing of a type and cost appropriate to the needs of the area, reducing the need for travel and transport particularly by car and lorry and facilitating sustainable travel choices; and ensuring good physical access for all to essential services and facilities.	
Environment Agency	Sustainability Appraisal	There is a discrepancy between the Local Plan and the Sustainability Appraisal document regarding sites that had been identified as having potential for contamination. Sites identified for development are listed in the Local Plan and some of these have been identified as having potential contamination issues and hence flagged up with the statement “Address any contamination on site.” We are concerned that this may be giving a misleading impression that all sites without this flag are uncontaminated. Whilst this discrepancy has been amended in the November 2017 draft Local Plan for CR13d and WR3q, but not for CR14a, SR1a, SR1b, SR1c, SR4d. This needs amending.	No change proposed to the Sustainability Appraisal. It should not be assumed that sites without this statement are uncontaminated. The SA seeks to assess overall economic, environmental and social sustainability and should not serve as a detailed assessment of contamination.
Highways England	Sustainability Appraisal	Sustainability Appraisal – The SA considers any possible effects of the Local Plan, with the aim to alleviate the impacts of housing, employment and retail development. Whilst transport is considered, the SA does not draw conclusions about possible SRN impacts of the planned development and as such Highways England has no comments on the SA.	Noted. No change needed.
Phillimore Successor’s Settlement Trustees	Sustainability Appraisal	Appendix 3 of the Sustainability Appraisal tests the option of four strategic development locations as urban extensions to Reading. The allocation of land to the northeast of Reading for residential development is said to have adverse impacts – it “would harm landscape character...since the site is undeveloped.” However, the same conclusion is not drawn in respect of other strategic locations which are also undeveloped. In fact, our clients land at Playhatch is not, in itself, of any particular landscape value and due to reasons of topography has no inter-relationship with the AONB. It is therefore not clear why this has scored negatively (especially as other strategic locations, which are also undeveloped, have scored neutrally in this respect). The SA also scores the north-eastern development location negatively under impact on	Do not agree. No change proposed. The appraisal refers to a very large area for urban extension that far exceeds the size of the clients land at Playhatch. Thus, although development on the ‘land at Playhatch’ may not bring harm to landscape, health, education and transport, a large urban extension is likely to harm to the AONB and place stress on infrastructure. In terms of health, education and transport, the appraisal seeks to estimate the ease of mitigating impacts. Due to particular constraints, such as the barrier provided by the Thames River and

		<p>healthcare infrastructure and school places, despite acknowledging that such infrastructure could be provided. With respect to transport infrastructure (Objective 14) the site scores especially poorly, despite the draft Local Plan supporting significant transport infrastructure improvements in this location (Park and Ride and Third Thames Crossing). This is illogical in the extreme. Lastly, the SA states that development in this location would expose residents to floods, “as much of the area is subject to fluvial flooding.” However, on our clients land only a narrow strip of land along the A4155 frontage lies within Flood Zone 2 and the vast majority of the site lies within Flood Zone 1 i.e. at the lowest risk of flooding. It can therefore be seen that there are inaccuracies in the assessment of land to the northeast of Reading as strategic development location, and inconsistencies with other strategic development locations which the Council favours in the draft Plan. The draft Plan is therefore, currently not the most appropriate strategy based on the evidence and is not ‘justified’ i.e. is ‘unsound.’</p>	<p>oversubscribed schools and surgeries in the north of the Borough, impacts in the north would be more difficult to mitigate than in the South, where there is very little risk of flooding, more capacity in schools and surgeries and no major transport barrier.</p>
<p>Studios Construction (Reading) Ltd</p>	<p>Sustainability Appraisal</p>	<p>Sustainability Appraisal - Studios note that the draft policies within the emerging Local Plan are assessed against the 20 environmental, social and economic objectives contained within Table 2 on page 11 of the Sustainability Appraisal. Our client further notes that three options were tested in relation to draft policy H12, namely:</p> <ul style="list-style-type: none"> • H12(i): No policy • H12(ii): Locate student accommodation throughout the Borough • H12(iii): Focus student accommodation close to the university and on campus if possible <p>Currently within Reading’s adopted Development Plan, there is not a specific policy which relates to student accommodation. This therefore is most closely aligned with option i above. With regard to options ii and iii, we would initially note that option iii does not reflect the wording proposed by draft policy. Draft policy H12 uses the term ‘on or adjacent to’ where as option iii uses the term ‘close to’ and ‘if possible’. As the term ‘close to’ could be interpreted as being a sustainable distance from, rather than immediately adjacent to, it is considered that the</p>	<p>Change proposed to change ‘close to’ to ‘adjacent to’ the university so as to most accurately assess the policy within the Plan. No change needed regarding option ii – the appraisal states ‘tendency towards positive effects.’ No changes proposed regarding option iii and objectives 4, 9, 13, 16 and 20. Economically, students are still very likely to visit the town centre even from student accommodation at the University. The areas are well-connected by public transport. If new student accommodation was not possible on sites adjacent to or on campus, the policy allows for flexibility with the language ‘unless it can be clearly demonstrated how the proposal meets a need that cannot be met on adjacent sites’. This will ensure choice for students and access for</p>

		<p>sustainability appraisal may not directly relate to the policy wording. Indeed, our client would support the intention of the wording contained within the sustainability appraisal, as it would suggest potential for those sites which are within a sustainable distance to the University. If the Council are therefore to stand by the results of their sustainability appraisal, then the wording of draft policy H12 should be amended accordingly. Our client considers that there are some inconsistencies between option ii and option iii, as explained further below.</p> <ul style="list-style-type: none"> Option ii - The sustainability assessment considers locating student accommodation throughout the borough would result in a "...tendency towards positive effects with regard to education", attributing a 'tendency to be positive' score with regard to objective 20. Our client considers that this is a conservative score as there is no evidence to suggest that the ability to provide student accommodation throughout the borough, would be anything less than 'positive' in relation to maximising access to education and supporting sustainable growth. Indeed it would promote choice and ensure that students and the part-time jobs that they might hold are not exclusively located on or adjacent to the University. The assessment further considers that an "...overprovision of student accommodation may occur in areas where sites are better suited for general housing needs. This would bring negative effects with regard to housing (13) and a tendency towards effects in relation to undeveloped land (4) and townscape character (9)". Accordingly, the sustainability appraisal attributes a 'negative' ('X') score with regard to objective 13, a 'tendency to be negative' ('?X') score with regard to objective 4, and 'tendency to be negative' ('?X') score with regard to objective 9. Our client considers that there are some inconsistencies between option ii and option iii, as explained further below. Option iii - The sustainability assessment, with regard to 	<p>developers where there is a need. Do not agree that there are negative effects out of term time. Reading University hosts a large number of international students many of whom may remain during holidays. Additionally, sites will be well-integrated with the surrounding areas.</p>
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		<p>objectives 4, 9, 13, 16, and 20, attributes a 'positive' ('□') score for all. The sustainability appraisal argues that the reason for the positive increase to objectives 4, 9 and 13, when considered against option ii, is that "...more sites in the town centre are made available for housing needs. This would bring positive impacts with regard to use of undeveloped land (4), townscape character (9), housing (13)..." It is considered however that the sustainability appraisal does not take account of the possible negative effects associated with having student accommodation concentrated in one area. It has been established within the Local Plan, as referred to above, that the University's Whiteknights Campus is constrained and it follows therefore that some of the future student accommodation developments may be focused on land 'adjacent to' the Campus, rather than on the Campus itself; taking draft policy H12 as currently written. However, the Whiteknights Campus is surrounded by established residential areas populated with housing of a range of types and styles, which may not be appropriate for high density student accommodation and therefore the policy should give greater support for other sustainable locations, where a more flexible approach for density can be achieved whilst respecting the character of its surroundings. Consequently it is likely that more housing will be converted into Houses of Multiple Occupation (HMO's) to account for the student demand. Arguably this will have a far greater detrimental impact on the availability of 'general' housing, as endorsed by paragraph 4.4.58 of the draft Local Plan: "Conversions either individually or cumulatively, can also have a harmful impact on the character of the area through unduly diluting mixed and sustainable communities. In certain parts of the Borough, there are high concentrations of flat conversion and houses in multiple occupation, in part reflecting the very high student population which is especially prevalent around the University. Given that</p>	
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		<p>students are predominantly present during term time only, it can leave roads and areas feeling quite dormant at other times, failing to achieve a mixed and sustainable community.” This would appear to sit in contrast to policy H12, which seeks to direct student accommodation adjacent to University Campuses and therefore create a concentration of students. The Council should be clear on whether they consider this to be a positive or negative situation, and ensure consistency within the text of the Local Plan. Moreover, it would appear that the student population within East Reading is already prolific and noted as being an issue within paragraph 9.1.5 of the draft Local Plan: “...East Reading’s population is boosted by thousands of students...this boosts the vibrancy of the area, but can also lead to tensions with permanent residents.” To conclude therefore, our client considers that the sustainability appraisal is skewed and inconsistent with how the effects on the 20 objectives are assessed, in relation to draft policy H12. Moreover it is strongly considered that the main element draft policy H12 to be assessed in detail, is that of reducing student accommodation within the town centre. However, the policy and sustainability appraisal do not properly address the opposite element of draft policy H12; the impact of directing student accommodation to only one area of Reading. The centre of Reading lends itself to high density student accommodation, due to the access to goods and services, its proximity to the University Campus, the ability for purpose built student accommodation blocks to knit more sympathetically with the townscape, the ability for redundant office spaces to be revitalised and the ability to create car free accommodation for users who typically do not rely on car transportation. Moreover, our client considers that habitually, students are more likely to venture into the centre of Reading when they are within close proximity, rather than when they are not. Economically therefore, Reading may see a higher</p>	
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		<p>activity rate within its town centre from students who live closer, than those who do not. With regard to commerciality, our client is concerned that draft policy H12, as written, would not only restrict deliverability for the reasons noted above, but would also begin to restrict access to the purpose built student accommodation market for private developers, and therefore create an oligopoly due to the potential reliance on the University to release land. The consequence of this outcome would be a both a reduction in supply and the choice on offer to students, which is considered to be an undesirable outcome for all.</p>	
Thames Properties Limited	Sustainability Appraisal	<p>Sustainability Appraisal – The RBC Sustainability Appraisal assesses the development options for Policy EM3 and concludes that the preferred approach is for the presumption in favour of the retention of employment land in the CEAs with some limited strategic release. Thames Properties is generally supportive of this conclusion and the proposed release of the site WR3a from the Richfield Avenue CEA to accommodate residential development. However as set out above, the Richfield Avenue CEA is unlikely to benefit in the long-term to being restricted to the pure or traditional employment uses that were intended for it through the original CEA designation, and the Local Plan should allow for greater flexibility in this CEA to accommodate ancillary commercial uses that would enhance the overall vitality and viability of the employment area.</p>	<p>Change proposed to account for economic benefits of limited commercial uses on the edge of a residential development (option ii, change 18 from ?X to ✓X).</p>
Thames Properties Limited	Sustainability Appraisal	<p>Sustainability Appraisal – Thames Properties support the conclusion drawn in the SA for WR3a that option ii to redevelop the site for residential use is the most preferable option having regard to the number of positive effects when compared to either retaining the site in its current form and use, redeveloping for employment use, or redevelopment for retail or leisure use. More generally however, we are concerned that the SA fails to sufficiently assess the element of Policy WR3a which allows for commercial uses on the western edge of the site. The conclusions drawn in the SA do not support the inclusion in the</p>	<p>Change proposed to account for economic benefits of limited commercial uses on the edge of a residential development (option ii, change 18 from ?X to ✓X). Do not agree that these objectives have not been assessed. Objectives 5 and 6 indicate both positive and negative effects for all development options. Do not agree that commercial uses will increase the likelihood of crime (objective 12) any more so than general</p>

		policy, they support the re-use of the site for residential use. The inclusion of commercial uses within the site has the potential to have a negative or tendency to a negative, impact on SA Objectives 5, 6 and 12, but these are not assessed within the SA. There is no clear justification or support, therefore, for the conclusion in WR3a that the site has the potential for commercial uses.	employment uses or residential use.
Thames Properties Limited	Sustainability Appraisal	The SA assesses Policy WR4 and concludes that the most preferable option is to allocate the site for Traveller pitches as it will reduce unauthorised encampments in the Borough. However, the SA also acknowledges that the proposed allocation will result in a negative tendency to negative impact on 9 of the SA objectives. According to the SA, this is a worse outcome when compared with the assessment of one of the alternative options, which is to develop the site for offices/leisure/retail. We therefore consider the Policy WR4 is not sufficiently supported by the SA.	It is important to note that the SA is a qualitative, not a quantitative exercise. Thus, negative impacts are not necessarily a reason to avoid development entirely. A negative impact simply indicates a need for mitigation. In this case, we believe that any negative impacts can be sufficiently mitigated.
University of Reading	Sustainability Appraisal	ER1c – three options were appraised and option ii was selected. The University supports this conclusion, however, given the significant housing need and shortfall of planned housing marginally below 1,000 dwellings over the Plan period, we would recommend that the number of dwellings on the site could be higher than 12-18 and that 20 dwellings could be delivered subject to suitable layout and design.	Noted. No change needed. The supporting text in the Local Plan indicates that the capacity of sites will ultimately depend on factors addressed at application stage.
University of Reading	Sustainability Appraisal	CA1a – The Council chose to proceed with Option ii to allocate 16-25 dwellings on the site, restricting development to Flood Zone 2. Whilst the University supports the principle of the SA in its appraisal of the site as a suitable draft allocation, we would recommend that option iii is given further consideration in light of the significant housing shortfall included within the Draft Plan. It is considered that a greater proportion of the site can be developed, subject to technical work appraising the ability to mitigate any potential negative impacts on flood risk on neighbouring properties and/or land, and the potential for adverse impact by virtue of flood risk on proposed dwellings.	Noted. No change needed. The supporting text in the Local Plan indicates that the capacity of sites will ultimately depend on factors addressed at application stage.
University of	Sustainability	H12 – The University of Reading generates a significant number of	Option iii and the draft policy do not refer to

Reading	Appraisal	<p>qualified, skilled professionals which the Pre-Submission Plan, at paragraph 4.4.95, recognises make a “major contribution to its (Reading) economic success” and that “it is important that sufficient accommodation is provided to enable students to live close to where they study”. Therefore, the ability to provide student accommodation is key to ensuring that the University of Reading maintains its reputation and remains a “major focus internationally” (Pre-Submission Plan, paragraph 9.2.5). The SA considers the Council’s draft Student Accommodation policy (Policy H12) against 20 objectives, listed within Table 2 of the report. Those which the Council consider to be relevant to the student accommodation policy are 4, 9, 13, 16 and 20.</p> <ul style="list-style-type: none"> • Objective 4 – The University note that there is a significant difference between Option ii and Option iii. Option (ii) could in theory mean the development of student accommodation anywhere within the Borough, be it undeveloped greenfield sites, or previously developed land. What is important to note is that Option iii) includes student accommodation “close to the university and on campus if possible”. The University would support this Option as drafted in that “close to the university” indicates locations where students would be able to conveniently access the University campus via sustainable transport modes including walking, cycling and public transport. Notwithstanding the above comment regarding how Option (iii) should be interpreted, It would appear that the primary objective of SA objective 4 is the efficient use of land. The University would not object to this principle. However, draft Policy H12 (which is addressed in detail later in these representations) appears to incorrectly reflect what has been tested against this objective. Draft Policy H12 requires that new student accommodation will be provided “on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation”. The policy wording has not been tested within the SA, and if it were to correctly reflect what was assessed for Option (iii), should instead reflect the ability for student accommodation to 	<p>areas accessible to campus via sustainable transport modes. Change proposed to change ‘close to’ to ‘adjacent to’ the university so as to most accurately assess the policy within the Plan. Options i and ii bring a tendency toward negative impacts with regard to townscape character as the proliferation of HMOs can bring negative effects. HMOs can bring positive effects to housing by providing flexibly let accommodation, but can also bring negative effects to townscape character. The effects related to objective 13 vary between options ii and iii. Option ii may result in the loss of sites in the town centre for housing for the general population, thus limiting units and decreasing affordability. Option iii would prevent these pressures on town centre sites. Agree that options ii and iii would support objective 16. This is stated in the appraisal. With regard to option 20, please see clarification above. Change proposed to change ‘close by’ to ‘adjacent to’.</p>
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		<p>be placed on campus where possible, but where this is not possible in other locations which can sustainably access the main campus (i.e. locations close to the University).</p> <ul style="list-style-type: none"> • Objective 9 - The Council consider that Option (i) and (ii) would both have a tendency towards a negative impact on this sustainability objective, though the Council's reasoning is unclear. The reason provided within the SA is that allowing student accommodation "throughout the Borough" would negatively affect townscape character "by failing to provide an appropriate residential mix". Student accommodation may only affect townscape character where there is such density, within any single area, of students to the extent that the mix of the area would be heavily geared towards students, who largely vacate outside term time. This would not be the case in well distributed student accommodation, which would make up a smaller proportion of the residential mix within those areas. The University considers that having a positive impact on this SA objective requires appropriate distribution rather than prevention of student accommodation outside existing campus areas. The Council's SA also cites that to allow student accommodation throughout the Borough may (Option ii) may cause negative effects. This is in reference to comments within the Pre-Submission Plan at paragraph 4.4.57 where it is stated that the loss of family housing, which is converted to Houses of Multiple Occupation ("HMO"), can erode the character of an area, causing car parking problems and other undesirable characteristics. Paragraph 4.4.58 of the Pre-Submission Plan relates these characteristics, in certain parts of the Borough, to HMOs which accommodate the high student population, leaving some roads dormant outside term time, "failing to achieve a mixed and sustainable community". It continues to state that "in locations with already high numbers of flats or houses in multiple occupation, conversions to single family housing could help create a more mixed and sustainable community. The University would agree that the high number of students seeking to study at the University 	
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		<p>can lead to a high demand for student housing. Where dedicated student housing is not available, this can result in the forming and accommodating of market housing as student accommodated HMOs. Dedicated student accommodation, distributed in sustainable locations could help reduce the reliance on students creating HMOs from market housing and reduce the impacts described within paragraph 4.4.58 of the Pre-Submission Plan, thereby improving townscape character. The provision of dedicated student housing could also allow existing market housing to remain available to meet general housing needs rather than be converted to a student HMO, whilst potentially allowing existing HMOs to revert back to general market housing. However, again, if the Council correctly reflect Option (iii) in the draft wording for Policy H12 then there would not be an issue, in that student accommodation could be located on campus where possible and close to the university in sustainable, appropriately distributed locations (convenient access to the main campus by non-private car modes), through dedicated developments which include the appropriate provision of facilities (rather than the creation of further unofficial HMOs).</p> <ul style="list-style-type: none"> • Objective 13 - The distinction between the impact between Options (ii) and (iii) on the SA objective is unclear in the Council's assessment. It is again considered that the matter here is the efficient use of land. Unfortunately, the Council does not fully consider within the SA assessment that insufficient student accommodation (which could be provided more efficiently in dedicated developments) through not supporting it in sustainable locations, tends to lead students to create / reside in HMOs, occupying housing which could otherwise provide for general market / affordable needs. Thereby, the over constriction of dedicated student housing (which at a higher density make more efficient use of land than market and affordable housing) can potentially have the reverse effect, reducing the availability of market and affordable housing. The University also points to the importance of maintaining its success, maintaining the important 	
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		<p>international reputation it holds and its contribution to the local economy and facilitating its growth. To grow and maintain its position, the University requires student accommodation in locations close to (i.e. with sustainable access to) the main campus. It is considered that Option (iii) does this, but that draft Policy H12 requires amendment to include sustainable locations “close to” the main campus. Whether it is student accommodation or residential development, there is need for both, and the University supports the efficient use of land in meeting recognised needs.</p> <ul style="list-style-type: none"> • Objective 16 - The University agrees with the Council’s assessment that Option (i), to not support the delivery of student accommodation would discriminate against a predominantly younger age group that wishes to attend the University of Reading to study, but that to provide a Policy through Option (ii) or (iii) would support the achievement of this objective. • Objective 20 - The University agrees with the SA assessment on how Option (i) performs against this objective in that it would not support access to necessary education, skills and knowledge in support of those individuals then contributing to society and the sustainable growth of the economy. However, the University does not see there to be any distinction in the performance of Options (ii) and (iii). Both options would support the provision of student accommodation and therefore access to education, skills and knowledge providing that such new accommodation is in locations that would facilitate sustainable access to the main University campus. 	
Bracknell Forest Council	Duty to Co-operate Statement	Duty to Cooperate – The Duty to Cooperate Statement (November 2017) lists in Appendix 2 a chronology of meetings and consultations, including some with Bracknell Forest Council. This Council publishes an AMR on Duty to Cooperate which records some Duty to Cooperate events with Reading Borough Council. As stated before, ongoing co-operation between this Authority and Reading Borough Council should include the topic areas of employment, housing (including Gypsies and Travellers), transport and health. Bracknell Forest Council is due to	Noted. It is agreed that the duty to co-operate process is ongoing and has continued since publication of the November 2017 version. A March 2018 version has been produced to accompany the Submission Draft Local Plan.

		consult on its Draft Local Plan in February/March 2018. Given the strategic nature of some issues both Local Plans identify, it will be necessary to hold some Duty to Cooperate meetings in the coming months.	
Royal Borough of Windsor and Maidenhead	Duty to Cooperate Statement	Duty to Cooperate Statement - 2.3.6 The Memorandum of Understanding (MoU) between the six authorities was not signed by RBWM. RBWM welcomes the amendment to this paragraph to reflect this fact. However, it should be noted that RBWM is willing to continue to cooperate and work towards the formation of an agreed MoU in the future. In addition, discussions involving RBWM and South Bucks District Council have suggested that they would also like be involved in any future discussions regarding a MoU.	Noted. No change needed. Discussions on a revised MoU with South Bucks regarding objectively assessed need are underway.
Gladman Developments	Strategic Housing Market Assessment	SHMA – Unsound (Positively prepared, justified, effective, consistent with National Policy). The Local Plan relies on the OAN set out in the above document which indicates that OAN for Reading is 699 dwellings per annum over the period 203 to 2036. This is based on the 2012 Household Projections, which are then adjusted to take into account a number of matters. In response to market signals, Gladman would raise concerns that the proposed uplift of 57 dwellings per annum is insufficient to address the affordability issues that exist in the area. ONS data confirms that the median quartile resident affordability ratio in Reading is 8.98 and the lower quartile ratio is 10.64. This is a worsening issue in the local context and the Local Plan must take this fully into account. This is an issue that has the potential to get worse over the plan period if housing supply in local markets within and around Reading are unnecessarily constrained, for example through arbitrary constraints being applied at the urban edge where administrative boundaries are tightly drawn.	No change proposed. The affordability issues in Reading and surrounding areas are recognised, and the reasons for the uplift in dwellings to account for market signals is set out in detail in the SHMA. The SHMA, rather than simply applying a crude uplift on a proportional basis, has sought to identify the effects of the affordability issue and quantify them. Other than an assertion that this is insufficient, this representation does not propose any alternative method of approaching this issue.
Bracknell Forest Council	Transport Modelling	Transport – Comments on the Local Plan transport modelling have already been provided separately in an email dated 31 October 2017, which related to concerns that the study area of the modelling did not include Bracknell Forest schemes, or importantly the addition of the Lexicon. It was noted that the ability of our network to allow movement	These comments on the modelling were received and considered. In terms of growth outside the immediate study area, whilst not explicitly included, it is considered through the inclusion of TEMPro growth, including within Bracknell BC

		<p>between the M3 and M4 motorways impacts on the study area and that improvements and developments in Bracknell should be taken into consideration. In addition, it was noted that there was no mention of the forthcoming smart motorway improvements on the M4. To date we have had no further correspondence on these issues raised, and the transport modelling work did not appear to be available on the RBC website. As such this remains an outstanding concern that needs to be addressed through Duty to Co-operate discussions. We would expect these matters to be resolved ahead of the Planning Inquiry into the Reading Borough Local Plan.</p>	<p>area. M4 Smart Motorway is not included within the modelling and the Council is investigating whether it can be incorporated.</p>
Highways England	Transport Modelling	<p>On 27 October 2017, I received an email from Mark Worringham from RBC which contained a report summarising the transport modelling work undertaken by RBC's consultants, PBA. Highways England consultants undertook a brief review of the modelling in November 2017. The review showed that there is insufficient information to establish in detail the likely impacts on the M4. The modelling appeared to show that traffic conditions at junctions 10 and 11 on the M4 could deteriorate as a result of the demand flows in the 2036 Local Plan scenario. It is also not clear how the Highways England Smart Motorways proposals between M4 J3-12 have been captured in the modelling which is essential to ensure the Local Plan impact on the SRN has been considered correctly. Highways England would like to undertake a detailed review of the traffic modelling that has taken place to date. This will need to be done in the context of the proposed options in the Local Plan, it is understood that the modelling is not currently forming the Local Plan evidence base. It is not clear what modelling will be used to support the Local Plan therefore form part of a robust and credible evidence base to demonstrate plan and policies are deliverable. We would welcome the opportunity to work with RBC on the transport modelling work and jointly establish the traffic impacts on the SRN ahead of the Local Plan being submitted for approval to the Secretary of State. To confirm that the that the Local Plan is effective and deliverable in line with the NPPF (2012), this modelling must demonstrate clearly</p>	<p>The Transport Modelling work has been completed and provided to and discussed with Highways England. The Modelling as currently provided does not take account of the M4 Smart Motorway scheme. The Council is currently working with HE to investigate how the specific matter of the Smart Motorway can be resolved with a view to a Statement of Common Ground.</p>

		<p>the Local Plan impact on the SRN and as necessary provide suitable mitigation in line with Policies TR1 and TR3. This work will form a key piece of evidence to demonstrate the Local Plan is sound, therefore it is important that any identified mitigation has a reasonable prospect of delivery within the timescales of when growth is planned. Once the transport impacts of Local Plan sites are understood, the IDP should set out any SRN mitigation required to deliver the Local Plan development. For background, please see:</p> <p>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/461023/N150227 - _Highways_England_Planning_Document_FINAL-lo.pdf</p>	
Environment Agency	Strategic Flood Risk Assessment Level 1	<p>We do not consider the SFRA to be sound. Paragraphs 10.1.7 – 10.1.9 need to be clear that they follow Table 3 of the Planning Practice Guidance there is no inappropriate development within Flood Zones 3b or 3a. The definition of previously developed land needs to be removed or clarified so it is clear what this will mean for applicants and developers. This is especially the case if the vulnerability of the development on site increases. It also needs to be clear that the sequential and exception test may need to be applied in accordance with national planning policy and that a flood risk assessment will be required. Paragraphs 10.1.7 -10.1.9 of the Level 1 SFRA tries to define functional floodplain which is Flood Zone 3b. This has been defined in two categories as Flood Zone 3b 'Developed' and Flood Zone 3b 'Functional Floodplain'. The definition of Functional Flood Plain 'Developed' is "areas of 'previously developed land', which are considered equivalent to Flood Zone 3a for planning purposes. "The definition of Flood Zone 3b 'Functional Floodplain' is "areas of existing open space that are subject to flooding. Our concern with the 'developed' definition of the functional floodplain is that more vulnerable and highly vulnerable development may be promoted in the Functional Floodplain (Flood Zone 3b). This is not consistent with national policy, which is the National Planning Policy Guidance (NPPF) paragraph 100 which states that: "Inappropriate development in areas</p>	<p>No change proposed. The points around the way in which the SFRA has been carried out are noted. However, it is important to clarify that the area that has been used in preparing the Local Plan is the functional floodplain itself, not the functional floodplain (developed), which means that the Local Plan content is unaffected. No development is proposed within either definition of the functional floodplain.</p>

		<p>at risk of flooding should be avoided by directing development away from areas at highest risk” and “Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property” In table 3 titled ‘Flood risk vulnerability and flood zone ‘compatibility’ of the Planning Practice Guidance it states that less, more and highly vulnerable development should not be permitted in Flood Zone 3b (Functional Floodplain). As the Environment Agency we will object to any development which is inappropriate with the flood zones according to Table 3. Therefore the guidance within paragraphs 10.1.7 -10.1.9 of the SFRA Level 1 is not consistent with national policy. We do not believe that the definitions of functional floodplain in paragraphs 10.1.7 and 10.1.8 clearly set out that inappropriate development will not be permitted in these flood zones. Paragraph 10.1.8 of the level 1 SFRA, further promotes inappropriate development in the functional floodplain by taking the definition of ‘previously developed land’ from the glossary of the National Planning Policy Framework, and misinterpreting it to be used to define the functional floodplain ‘developed’. Paragraph 10.18 reads as follows: “Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time”. This definition of ‘previously developed land’ is not meant to be referred to in the context of the functional floodplain. Our concern is that planning applicants may consider this definition to mean that any new development on land that is subject to flooding in a 1 in 20</p>	
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		<p>(5%) annual probability fluvial flood event, will be appropriate as long as there is a structure already on the land, regardless of what this structure is, or whether the land is prevented from flooding in a 1 in 20 year flood event by existing defences, infrastructure or solid buildings or not. For example, a developer could argue that this definition means that a residential dwelling could be located on a site within the 1 in 20 year flood extent, as there is an existing warehouse on the site. This would result in an increase of the vulnerability of the development on the site, putting future occupants at risk of flooding. If the definitions within paragraphs 10.1.7 and 10.1.8 are necessary for site allocations in this local plan then the local planning authority need to justified this decision as part of their local plan evidence. However these definitions are a concern to us as the may be used more widely as detailed above. Paragraphs 10.1.7-10.1.9 need to be clear that they follow Table 3 of the Planning Practice Guidance so there is no inappropriate development within Flood Zones 3b or 3a. The definition of previously developed land needs to be removed or clarified so it is clear what this will mean for applicants and developers. This is especially the case if the vulnerability of the development on site increases. It also needs to be clear that the sequential and exception test may need to be applied in accordance with national planning policy and that a flood risk assessment will be required.</p>	
Environment Agency	Strategic Flood Risk Assessment Level 2	<p>Paragraph 3.4.6 of the level 2 main report sets out RBC's approach to safe access and egress for more vulnerable development. The Environment Agency detailed modelled extents show that the site allocations in the Local Plan should have safe access and egress for up to a 1 in 100 year flood event. The SFRA proposes to leave the full access and egress analysis to see if an area outside of the 1 in 100 year plus an allowance for climate change event is achievable, until the planning application stage. It is proposed that if a detailed FRA demonstrates safe access and egress can't be achieved in the 1 in 100 year plus an allowance for climate change event, then the emergency planning team will then be consulted to see whether an evacuation plan is acceptable.</p>	<p>No change proposed.</p> <p>There are a total of six sites where the SFRA noted that a Flood and Evacuation Plan will be required, but one of these (Napier Road Junction) now has planning permission in any case. It is considered that there is a reasonable prospect that plans can be developed that would be approved. However, this is something that would need to be tested at planning application stage.</p>

		<p>If not, then the site will be considered for less vulnerable development. It has not been confirmed if Reading's emergency planning team have already had sight of these potential allocated sites where access and egress outside of a 1 in 100 year plus an allowance for climate change even may not be possible. If they haven't, there is a risk that the evacuation plans will not be approved. This would mean that these sites could become undeliverable for residential development at the planning application stage. This is an issue that the local planning authority need to be aware of and address in their evidence for their site allocations. It should also be clarified if the emergency planning team have agreed with the safe access and egress approach for more vulnerable development for any windfall sites that may come forward too.</p>	
Environment Agency	Sequential and Exception Test	<p>We do not believe the sequential test is sound. It is not clear to us why some sites have been discarded in Flood Zone 1 whilst there are sites allocated in Flood Zone 3. The sequential test does not explain in planning terms why sites at a lower risk of flooding have been discounted. Paragraphs 2.3 and 2.4 refer to regeneration needs but it is not clear why this outweighs flood risk. Therefore the evidence base is not robust and the plan is unsound as it is not justified. We need further clarification and justification on these points regarding the sequential test. We need to know the planning reasons for discounting sites at a lower risk of flooding. How do these reasons outweigh flood risk?</p>	<p>These points have been previously addressed in the response to comments on the Draft Local Plan. The reasons that sites in Flood Zone 1 have been rejected is set out in the HELAA. It is not proposed to copy and paste all of the reasoning from the HELAA across to the Sequential Test, which is long enough as it is. The HELAA references are used in the Sequential Test for ease of reference.</p> <p>Paragraphs 2.3 and 2.4 are commentary which set out how the sequential test has previously operated, for instance in relation to the RCAAP. The matters set out in Paragraphs 2.3 and 2.4 have <u>not fed into the sequential test of any sites in the current Sequential Test document.</u></p>
Home Builders Federation	Other evidence - Viability	<p>Evidence base - The Council have not published a whole plan viability assessment as part of this regulation 19 consultation. Having spoken to the Council they confirmed that this key evidence would only be published in submission to the Secretary of State. This approach is unacceptable as it fails to give the development industry the</p>	<p>A Viability Assessment has been carried out and is included within the evidence base.</p> <p>The Council has sought to make as much of the evidence base public as possible at the time of</p>

		<p>opportunity to submit comments on the viability of the plan prior to its submission. It also suggests that the cumulative impact of the plan on development did not inform its preparation but is an exercise in justifying the aspirations of the Council. Therefore, we do not consider this approach to be legally compliant. Publication is required by regulation 19(a), 17€ and paragraph 173 of the NPPF.</p>	<p>Pre-Submission consultation. However, resource constraints have meant that it is not always possible to publish everything in full at this point. It is unrealistic to expect that this is possible. Regulation 17 does not specify the publication of a Viability Assessment. This does not however mean that the viability work did not inform the production of the Local Plan, as, as the work progressed, it was able to feed back into the drafting without full finalised reports being available. The Viability Assessment has been provided to the HBF shortly prior to submission.</p>
Environment Agency	Other evidence: Water Cycle Study	<p>There are a significant number of new houses proposed within this growth period (>15,000) which equates to an additional effluent flow of approx. 5400m³/day that will eventually end up in the rivers. Only Reading Sewage Treatment Works (STW) is mentioned within the Infrastructure Delivery Plan (IDP), therefore it is assumed that this works will be receive effluent from all the proposed growth. This growth may have an impact on the water quality downstream of the STW. At present it is unclear if there is supporting evidence to show that this growth will not impact on the objectives of the Water Framework Directive (WFD). If the Council cannot satisfy the following questions it may be likely that a Water Cycle Study (WCS) may be required as part of the evidence base to show that the Local Plan strategy, policies, and/or allocations for new development are the most appropriate for an area, are deliverable within the timescales and are supported by suitable infrastructure, without detrimental impact on the water environment to ensure the Local Plan is deemed sound at inspection:</p> <ul style="list-style-type: none"> • Will the proposed housing growth have a detrimental impact on water quality? • Is there sufficient environmental capacity within the receiving water environment to accommodate the resulting increase in flow and pollutant loads from the Sewage Treatment Works as 	<p>It should be noted that a Water Cycle Study is not a requirement of the NPPF, and is described as a 'voluntary' study.</p> <p>Nevertheless, a Water Quality Assessment has been carried out and is included within the evidence base. This demonstrates that xxx.</p>

		<p>the result of the planned housing growth?</p> <ul style="list-style-type: none"> • If not, are there alternative discharge locations that will not cause a failure of water quality targets or cause deterioration in water quality? • Is there an increased risk of discharges from storm water overflows causing an adverse water quality impact? • Will the sewerage undertaker need to apply to increase the level of treated sewage effluent that is allowed to be discharged under the existing environmental permits, to allow for future growth? • Will the quality standard on the environmental permit need to be tightened to meet existing or future water quality standards as a result of the proposed growth (e.g. Water Framework Directive (WFD))? • Can the existing sewerage and wastewater treatment networks cope with the increased wastewater the proposed growth will generate? <p>Without the above assessment the local plan and the proposed growth may not be consistent with national policy and may not be justified or effective. The relevant National Planning Policy framework (NPPF) paragraphs are 110, 120, 165 and 173. In order to be satisfied that the proposed growth set out in the Reading Local plan does not have an impact on water quality then the above questions will need to be answered and if necessary a water cycle study will need to be completed. When this evidence is completed the local plan policy concerning water quality and the infrastructure delivery plan may need to be updated to reflect the findings of the water cycle study.</p>	
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