

H & T PROPERTIES



BLANDY & BLANDY
solicitors

Reading Borough Council
Pre- Submission Draft Reading Borough Local Plan
Representation on behalf of H & T Properties Ltd in respect of proposed policy WR4: Potential Traveller Transit Site at Cow Lane

This representation is made on behalf of H& T Properties Ltd.

H & T Properties Ltd are strongly opposed to the proposed location of land at Cow Lane for a traveller transit site. Our clients were extremely disappointed to note that notwithstanding the representations made on their behalf on 6 October 2017 regarding the Gypsy and Traveller Consultation (September 2017) document (“September Consultation”) the Council has proposed the policy in the most recent iteration of the Local Plan. 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.

Whilst, the September Consultation document did indicate that “if, after consultation, the site is considered suitable for transit provision, it is intended that it would potentially be included as an allocated site within the Pre-Submission Draft Local Plan”, it is not clear how the Council has reached this conclusion. Indeed it appears to our clients that given the timeframes between the undertaking of the site assessment, the closing of the September Consultation (at 5pm on 24 October 2017) and the issuing of the draft Local Plan with the newly inserted policy WR4 (on 30 November 2017) that the allocation of this site has been pushed through with inordinate haste and without taking into consideration the legitimate and significant issues and reasons as to why this site is unsuitable. Moreover, it appears that the Council have not properly and fully assessed the other alternative sites available (of which there are more than 80). Many of which appear to have been summarily dismissed for reasons which 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.

Reasons

As stated above, there are a number of reasons why the proposed site is unsuitable as a transit site for travellers. These include:

- Flood Risk
- Highways Access
- Impact of the use of the land on the surrounding area

Flood Risk

There is a serious concern regarding flood risk. The Site itself is located within Flood Zone 2 and directly adjoins an area of land within Flood Zone 3. The NPPF requires that when allocating land for development the sequential test should be applied to demonstrate that there are no reasonably available sites with a lower probability of flooding for the type of development or land use proposed. 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 developments.

It is clear from the Gypsy and Traveller Consultation Document (September 2017) that there are other reasonably available sites in Flood Zone 1 which have been disregarded for issues such as landscaping, which is easily mitigated. This site lies within an area at risk of flooding and the location is not suitable for the proposed use. In accordance with the NPPF, the Council should not be supporting the allocation of this site in the Local Plan.

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. In short, this is not a suitable site to locate any residential housing on.

Highway Access

The Site is located on land at the junction of Cow Lane 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 such as Cow Lane should not be considered practical or appropriate.

Our client is concerned that there will be a substantial increase in the vehicular use of the junction which will exacerbate highway problems on Cow Lane and Richfield Avenue. The movement of vehicles towing either caravans or trailers, especially during the rush hours in the mornings, evenings or at night, would be highly hazardous and would cause serious harm to the free flow of traffic and highway safety in the locality.

Additionally, our client is concerned that there will not be adequate visibility for vehicles existing and entering the Site due to the Site being located on a wide bend on Richfield Avenue, which will result in an increased highway safety risk to other road users.

Cow Lane is already under a great demand from a very high volume of traffic and is inadequate to deal with the greater strain of increased vehicles that will be added through the provision of the Site. The Council is clear that they wish to maintain Richfield Avenue as a Core Employment Area (EM2g on the Proposals Map). This proposed Employment policies clearly states that Employment development for industrial, storage and distribution should be located in highly accessible locations. The allocation of a site for non-Employment uses that would have a detrimental effect of the economic role of the area by negatively impacting on the highway network needed to support such Core Employment Areas is contrary to 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 of these policies within the Local Plan is avoided.

Impact of the use of the land on the surrounding area:

The area to the south of the site is currently surrounded by industrial, leisure and agricultural uses. H&T Properties Ltd have offices which are 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 on which Reading Festival takes place every year.

It is contended that a transit site for gypsy and travellers at this location is incompatible with the adjoining and surrounding land uses.

In particular, the Council will be aware that Reading Festival is also held on land which is in close proximity to the Site. Reading Festival is a major economic driver for the town and local area, and the site is required for around 6-8 from the end of July until the beginning of September.

Any allocation of land that is incompatible with the use of this land for the Reading Festival should not be allowed. It is difficult to envisage how a gypsy and traveller site would be sustainable in this particular location without having a major adverse impact on the Reading Festival, the operation of which has been established over many years.

A transit site would be better situated in a location which is closer to residential areas. The current location is isolated from residential areas and the settled community and the physical separation between the traveller community and the settled community may lead to non-integration, physical isolation and a rise in anti-social behavioural offences.

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 potentially be met”. That is with respect an extreme proposition.

The Gypsy and Traveller Consultation 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 on 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.

Conclusion

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. To put one of the major economic drivers to the town and wider UK economy at risk seems absurd in the light of the other sites available which are also more suitable in of themselves. The Site is susceptible to flooding, and will have a detrimental impact on the local highway network which supports one of the Readings key economic areas.

The allocation of the site should not be included within Policy WR4.

Blandy & Blandy LLP

26.01.2017

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>	H&T Properties Ltd	Blandy & Blandy LLP
Address 1	215 Cardiff Road	
Address 2		
Address 3		
Town	Reading	
Post Code	RG1 8HX	
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?

Policy WR4

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 checked="" 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 see attached representations.

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.

Deletion of Policy WR4, or amendment so that a specific site is not allocated.

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.

Due to the potential impact that this proposed policy may have on the area.

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:

HAMMERSON PLC

PRE-SUBMISSION DRAFT READING BOROUGH LOCAL PLAN, NOVEMBER 2017

REPRESENTATIONS ON BEHALF OF HAMMERSON PLC

AGENT'S DETAILS: Simply Planning Ltd, 15 Buckingham Gate, London, SW1E 6LB. Tel. 0207 9355880.
Email. Rachel@simply-planning.com.

B1. REPRESENTATIONS RELATE TO: SITE ALLOCATION CR14g

B2. Hammerson do not consider the Local Plan to be sound (for reasons below).

B3. As owner of The Oracle Shopping Centre and therein a major stakeholder in Reading, Hammerson Plc welcomes the opportunity to make representations to this emerging Local Plan. 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 Street. 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.

B4. Modifications required to ensure the Local Plan is sound:

CR14g The Oracle Extension. Development of areas at The Oracle Shopping Centre and on adjoining land for retail. Development Should:

- *Address flood risk issues;*
- *Enhance the Setting of the Conservation Area;*
- *Take account of potential archaeological significance; and*
- *Address any contamination on site.*

3,000 – 7,500m² of retail or town centre uses.

B5. Hammerson do wish to appear at the Examination in Public.

B6. To explain the development requirements for The Oracle Shopping Centre.

B7. Yes

HARDING, BARBARA

From: Barbara Harding
Sent: 24 January 2018 16:09
To: Planning Policy
Subject: Fwd: Proposed development of Mapledurham Playing Fields.

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

Subject: Proposed development of Mapledurham Playing Fields

Dear Sir/Madam,

With reference to the draft Local Plan Section EN7N Item EN7Nn.

I am very much against the proposed development of Mapledurham Playing Fields to build a school and would like to ask the following questions.

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:
 - 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, footballers, casual visitors
- i. Hours of operation
- j. Reduction to the quality of the environment

4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields.

Yours faithfully,

Barbara Harding

Click [here](#) to report this email as spam.

HEAPS, JOHN

From: John Heaps
Sent: 25 January 2018 10:11
To: Planning Policy
Subject: Local Plan Section EN7N item EN7Nn.

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

Dear Sir / Madam,

With reference to the draft Local Plan Section EN7N Item EN7Nn, I respectfully submit the following questions:

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, Caversham, 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:
 - 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, footballers, casual visitors
 - i. Hours of operation
 - j. Reduction to the quality of the environment
4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

I look forward to your response.

Kind Regards

John Heaps

HERMES PROPERTY UNIT TRUST

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		Mrs
First Name		Sara
Last Name		Dutfield
Job Title <i>(if applicable)</i>		Director
Organisation <i>(if applicable)</i>	Hermes Property Unit Trust	Turley
Address 1		The Pinnacle, 20 Tudor Road
Address 2		Reading
Address 3		
Town		
Post Code		RG1 1NH
Telephone		01189022835
E-mail		Sara.dutfield@turley.co.uk

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

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

Please see supporting representations

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 checked="" 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 see supporting representations

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 see supporting representations

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.

We consider it necessary to provide clarification on matters raised within our representations at the Local Plan Examination

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:



26 January 2018
Delivered by email

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

To whom it may concern

REPRESENTATIONS TO THE PRE-SUBMISSION READING LOCAL PLAN

We have been instructed by Hermes Property Unit Trust ('Hermes') to submit representations to the Reading Borough Council Pre-submission Local Plan (Regulation 19) in relation to their land interests at 'St Martins Centre, Caversham'. St Martins Centre currently benefits from an extant planning permission (Ref: 140997) forming the basis for the regeneration of the District Centre. Hermes is currently implementing with the first phase having been completed in late 2017.

These representations focus on matters pursuant to the application of the tests of soundness, as required under paragraph 182 of the Framework, to the Pre-Submission version of the Local Plan and those matters which are of particular relevance in the context of our Client's land interests.

Policies relevant to maintaining the vitality and viability of District Centres

A key objective of the new Local Plan is to maintain and strengthen District and Local Centres. It envisages that the 'diversity of centres will be broadened' (paragraph 3.2.9) alongside promoting 'high density residential accommodation in these sustainable locations would also help address local housing need' (paragraph 3.2.9). These are all objectives which are fully supported by our Client and reflective of their aspirations for St Martin's Centre which will contribute to the overall 'vitality and viability' of the centre and the wider community in line with paragraph 23 of the Framework.

Our Client supports the continued identification of Caversham as a District Centre within draft Policy RL1 alongside the inclusion of a series of objectives / improvements including:

- Accessibility and transport improvements;
- Broadening range of facilities;
- Residential use of upper floors; and
- Environmental enhancements.

The Pinnacle
20 Tudor Road
Reading
RG1 1NH

T 0118 902 2830 turley.co.uk

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.

In addition, Policy RL2 discusses the provision of retail, leisure and cultural development within Reading. 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. These could be worded to acknowledge that the provision within a District Centre should be proportionate to the size of the Centre. This position 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 able to 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.

It is considered that policy RL2 should reflect the opportunities that District Centres can offer with regard to additional leisure provision to ensure that the identified needs can be accommodated within the Town and District Centres over the plan period. This would ensure that the Local Plan is effective in delivering and broadening uses within existing designated Centres. Therefore, as currently drafted, the policy is neither positively prepared nor effective in line with paragraph 182 of the Framework.

With regard to policy RL3 (Vitality and Viability of Smaller Centres), we note that it is intended under point (a) for the proportion of the total length of the Key Frontages within the Centre that is in A1 or A2 uses to exceed 60%. We understand that this is an increase from 50% under the current policy and we would strongly object to this increase.

Point (b) of the policy specifically considers District and Local Centres and 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 the retention of A1 and A2 uses with the key frontage, 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 Framework¹ and as such whilst not objecting to the principle of the policy we do object to this element, in particular given 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 and would unintentionally be directly contrary to the intention of the policy.

When considering St Martin's Centre specifically, which forms a significant part of the District Centre and includes key frontages, our Client is committed to delivering additional retail and leisure provision which will significantly contribute to the vitality and viability as a District Centre (secured through extant

¹ Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

permission: 140997). This said, outside the 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' (paragraph 23). 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 want to live, visit and work*' (NPPG Ref: ID 2b-001-20140306). There is no justification at a national policy level, nor any local evidence provided, for restricting B1(a) uses in this location.

Whilst a key justification for the policy is to avoid a negative effect on the District Centre arising from residential uses being proposed at ground floor level, the Framework does not define this as a main town centre use in any event, albeit paragraph 23 considers that residential development can be appropriate within town centres. We consider the District Centres to be appropriate locations for new residential development to meet housing needs given these are highly sustainable locations and make a valuable contribution to delivering mixed use development. Increased town centre occupation drives footfall in the district centre shops, restaurants, offices, medical centres etc and generally add positively to the vitality of the centre. 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.

Given the above we consider that centre uses should be redefined to reflect the 'main town centre' uses defined within the Framework which will ensure town centres support sustainable economic growth and provide a wide range of social and environmental benefits (PPG Ref: Paragraph: 002 Reference ID: 2b-002-20140306). As currently drafted the policy is at odds with the objective of the Local Plan and with the guidance contained within the Framework which seeks to broaden the diversity of the centres. Further clarity is required on this matter.

In light of the above, and 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. Furthermore, the policy wording would fail to be effective in meeting Local Plan objectives for District Centre and could undermine the vitality and viability of the District Centre over the plan period.

Section 8 of the Local Plan (which relates to Caversham and Emmer Green), sets out the principles objectives for this area over the plan period. 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. It is considered that residential development will play a vital role in retaining the vitality of the town centre, delivering much need residential development of a higher density in an accessible location, alongside supporting the regeneration of the District Centre in the longer term.

In addition, given our Client's on-going commitment to the regeneration of St Martins Centre we support 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. Our Client is committed to its delivery alongside seeking further enhancements over the coming years to further ensure the long term 'vitality and viability' of the District Centre.

Other Relevant Policies

Policy CC2 discusses that *'all major non-residential development or conversion to residential are required to meet the most-up to date BREEAM 'Excellent' standards, where possible'*. Whilst it is appreciated that the location of many sites are within highly sustainable area, it is considered that further clarification is required beyond paragraph 4.1.1 as to what uses would be expected 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.

We wish to object to emerging policy H5 (Standards for New Housing) with regard to point c. in relation to *'all major new-build residential development being design 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 local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. To do so could result in a conflict between the requirements of the Local Plan and national requirements in relation to Building Regulations. We, therefore, consider that this part of the policy should be removed given it is not justified and nor is it consistent with national policy in line with paragraph 182 of the Framework.

We trust that the above representations are duly made and would welcome confirmation of receipt in due course.

Yours sincerely

Hannah Bowler
Senior Planner

hannah.bowler@turley.co.uk

HICKS, JULIE

From: Julie Hicks
Sent: 25 January 2018 19:04
To: Planning Policy
Subject: Objection to site allocation in Draft Local Plan

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

Hello,

I would like to register my strong objection to the allocation of a site to be accessed from Armour Hill for up to 18 dwellings. The site is called WR3s on the proposals map but WR3t in the written document.

My grounds for objection are

As a resident on Armour Hill I can confirm that Armour Hill already struggles to cope with the volume of traffic using this 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 plus the heavy natural landscaping along the south side of the road lend this road a pleasant rural appearance and this character should be protected rather than lost.

Sent from my iPad

Reading Borough Council
 Pre-Submission Draft Local Plan
 November 2017
 Representations Form



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	Mrs	
First Name	Julie	
Last Name	Hicks	
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?

Chapter 7. WEST READING AND TILEHURST Site allocation for WS3t*
* 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.

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

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

I am confident that officers at Reading Borough Council, being aware of these requirements, have sought to meet them as best as they can.

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.

As a resident on Armour Hill I can confirm that Armour Hill already struggles to cope with the volume of traffic using this 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 plus the heavy natural landscaping along the south side of the road lend this road a pleasant rural appearance and this character should be protected rather than lost.

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

Yes

No

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

Clearly I would like 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 who are making the same objection I would be happy to be represented by a fellow objector.

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:

Yes

Please keep me informed of all planning policy matters:

No

HICKS, STEVE
(including petition)

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	Hicks	
First Name	Stephen	
Last Name		
Job Title <i>(if applicable)</i>		
Organisation <i>(if applicable)</i>	Local resident and representative of those local signatories to the enclosed petition (hard copy to follow)	
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?

Site allocation WR3t Land at Armour Hill
Site allocation WR3s Land at Kentwood Hill

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

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

The allocation of site WR3t with an allocation for 12-18 dwellings does not take into account the adjacent WR3s site with an allocation of 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 poor of the parish of Tilehurst. 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 allotment use in Reading and a desire for community and individual `self grow` projects. Any development will have a negative affect 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 McIlroy 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 1st 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 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 a development of 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:

- 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

There is further risk that the allocation will put pressure on other similar existing land to be allocated for housing

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.

Site WR3t Armour Hill should be allocated 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.

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.

A more detailed presentation of the case can be provided by myself and other local residents as appropriate

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:

PROTECT OUR LOCAL ENVIRONMENT

**PETITION TO LOCAL PLANNING AUTHORITY OBJECTING TO THE PROPOSED
ALLOCATION OF LAND AT ARMOUR HILL (WR3t) AND KENTWOOD HILL (WR3s) FOR HOUSING**

DATE: 26TH JANUARY 2018

**WE THE UNDERSIGNED WISH TO SEE THE SITES AT ARMOUR HILL AND KENTWOOD HILL FORMALLY PROTECTED FOR
ALLOTMENT USE, OPEN SPACE AND WILDLIFE HABITAT.**

**WE THE UNDERSIGNED CONSIDER THAT DEVELOPING ANY OF THE LAND PROPOSED TO BE ALLOCATED FOR HOUSING WILL
HAVE A DETRIMENTAL AFFECT ON THE SETTING, CHARACTER AND ENVIRONMNT OF THE LOCAL AREA AND SHOULD NOT
BE ALLOCATED FOR HOUSING FOR THE REASONS SET OUT BELOW**

- o loss of open space
- o loss of local visual amenity from neighbouring streets
- o loss of strategic visual amenity over the thames valley
- o increased pressure on existing and diminishing local green space
- o destruction of established wildlife habitats including homes to protected species
- o loss of greenfield land and further pressure on the natural environment
- o increased pressure on local and public services and facilities including schools and health
- o increased pressure on the existing road network both in terms of additional traffic volume and on street parking
- o additional noise and light pollution
- o detrimental effect on the historic and rural setting of aspects of Armour Hill and Kentwood Hill

No	NAME	ADDRESS	SIGNATURE
1	STEVE HICKS		
2	JULIE HICKS		
3	MICK HARE		
4	KM ALLYSON		
5	RACHEL NORRIS		
6	CHARLIE NORRIS		
7	THEA SAINSBURY		
8	VERTY SAINSBURY		
9	SUE BLENHIM		
10	CHRIS AHERSON		
11	LOUISE SINCLAIR		
12	ALAN HOEFLING		
13	JANET HOEFLING		
14	SARAH SMITH		
15	JOE SMITH		
16	SIAMON WOODWARD		
17	MATT CATON		
18	SUE UPHILL		
19	PHILIP UPHILL		
20	MARTIN BRESCHA		
21	LAUCE CHARLES		
22	RACHEL FOREMAN		
23	STAN NIECK		
24	SAUSE DEVIZ		
26	SUSAN BAKER		
27	CHARLES BAKER		
28	Marilyn Hoare		
29	Tony Slatchin		
30	Koith Mackie		
31	Elaine Digweed		
32	Mark Digweed		
33	Sam Digweed		
34	Tom Digweed		
35	I. Carmichael		
36	Mike head		
37	ALEX COOKE		
38	Sally Couper		
39	MARK Collington		
40	Kellie Polington		
41	Sue Scott		
42	Dave Scott		
43	Beryl Netherton		
44	Kenneth Netherton		
45	Edmund Shaw		
46	Caroline Pegrum		
47	LISA DINECO		
48	MICHAEL FINN		
49	MIRK SAUNDERS		
50	ANDREW SWARICK		
51	B. C. WOOD		
52	M. A. WATTS		
53	PETER COOK		
54	Anna Cook		
55	SAM MANLEY		
56	JADE BANTER		
57	DENNIS PEAR		
58	BERYL PEARCE		
59	ROBERT PEARCE		
60	MYRA CANNING		
61	M. CALWING		
62			
63	M. HAYLE		

No	NAME	ADDRESS	SIGNATURE
64	C. SZKWAR		
65	M. GARDNER		
66	T. PILLER		
67	S. ARCHER		
68	J. KIRTON		
69	G. KIRTON		
70	C. OWEN		
71	MR A PHIPPS		
72	L. Marshall		
73	Pauline Kirk		
74	S. ALDERSON		
75	S. DAWSON		
76	D. DAWSON		
77	N. Purcell		
78	J. Purcell		
79	M. Purcell		
80	F. Purcell		
81	T. McADAM		
82	S. McADAM		
83	F. BETTS		
84	P. HALLIS		
85	APRION		
86	C. PLOT		
87	L. WILSON		
88	L. Bellman		
89	A. GAYWOR		
90	T. McADAM		
91	M. C. Hadden		
92	K. WELTON		
93	P. Hamilton		
94	E. HILLIER		
95	S. POLLOCK		
96	A. KERRICK		
97	D. EVANS		
98	Y. BLATT		
99	A. FOXON		
100	L. Pemberton		
101	GREG LEWIS		
102	T. GRIFFITHS		
103	K. CLARK		
104	M. CLARK		
105	J. Moran		
106	V. KNAPP		
107	V. CLARK		
108	S. DEAN		
109	P. VORR		
110	K. BUCKWOLD		
111	A. BAILEY		
112	S. ALLEN		
113	A. KERSHAW		
114	P. Hutton		
115	L. HAINES		
116	M. KERSCHOFF		
117	ROAD R.		
118	BOND. L.		
119	S. PARKER-BOYD		
120	D. ROYES		
121	S. Turner		
122	D. HYDON		
123	M. HYDON		
124	R. PESSIER		
125	K. PENNEY		

HIGHWAYS ENGLAND

From: Blake, Patrick <Patrick.Blake@highwaysengland.co.uk>
Sent: 24 January 2018 12:10
To: Planning Policy
Cc: 'Bose, Rajat'; Strongitharm, Glen; 'Townend, Zoe'; Ginn, Beata; Planning SE
Subject: Reading Pre-Submission Draft Local Plan

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

Dear Planning Policy

Thank you for consulting Highways England in relation to the Reading Borough Council (RBC) Pre-Submission Draft Local Plan.

Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such, Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. In this case Highways England's interests relate to the potential impact of development on the M4.

Overall, in accordance with national policy, we look to RBC to promote strategies, policies and land allocations that will support alternatives to the car and the operation of a safe and reliable transport network. We would be concerned if any material increase in traffic were to occur on the SRN because of planned growth within the Reading borough, without careful consideration of mitigation measures. It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.

When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures, which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the M4.

With regard to the M4 Junctions 3-12 Smart Motorways project, the Secretary of State made a formal final decision on 2 September 2016 to grant development consent for the scheme. Latest information can be found: <http://roads.highways.gov.uk/projects/m4-junctions-3-12-smart-motorway/>

We have undertaken a review of the latest information and have the following comments:

POLICY 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.

POLICY TR1: ACHIEVING THE TRANSPORT STRATEGY

Policy TR1 has not materially altered and therefore Highways England continues to be supportive of this policy, as it will minimise potential impacts in line with NPPF and Circular 02/2013.

POLICY TR3: ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS

Policy TR3 has not materially altered and therefore Highways England continues to be supportive of this policy, as it will minimise potential impacts in line with NPPF and Circular 02/2013.

POLICY SR1: ISLAND ROAD MAJOR OPPORTUNITY AREA

Policy SR1 has not materially altered and therefore all previous Highways England comments on this policy remain unchanged.

POLICY SR2: LAND NORTH OF MANOR FARM ROAD MAJOR OPPORTUNITY AREA

Policy SR2 has not materially altered and therefore all previous Highways England comments on this policy remain unchanged.

POLICY SR3: SOUTH OF ELGAR ROAD MAJOR OPPORTUNITY AREA

Policy SR3 has not materially altered and therefore all previous Highways England comments on this policy remain unchanged.

POLICY SR4: OTHER SITES FOR DEVELOPMENT IN SOUTH READING

POLICY SR4e: PART OF FORMER BERKSHIRE BREWERY SITE

Policy SR4e has not materially altered and therefore all previous Highways England comments on this policy remain unchanged.

POLICY SR4f: LAND SOUTH WEST OF JUNCTION 11 OF THE M4

Policy SR4f has not materially altered and therefore all previous Highways England comments on this policy remain unchanged.

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 delivery timescale of individual sites are clear especially with sites proposals that could impact the SRN.

SUSTAINABILITY APPRAISAL (SA)

The SA considers any possible effects of the Local Plan, with the aim to alleviate the impacts of any 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.

INFRASTRUCTURE DELIVERY PLAN (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 Strategic Road Network. 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.

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 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 the 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 Local Plan is effective and deliverable in line with the National Planning Policy Framework (2012), this modelling must demonstrate clearly 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 the growth is planned. Once the transport impacts of the Local Plan sites are understood, the IDP should set out any SRN mitigation required to deliver the Local Plan development.

For background, you may be interested to read “*The Strategic Road Network Planning for the Future*” which is a guide to working with Highways England on planning matters. Please see: [https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/461023/N150227 -
_Highways_England_Planning_Document_FINAL-lo.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/461023/N150227_-_Highways_England_Planning_Document_FINAL-lo.pdf).

We would welcome the opportunity to meet with RBC in the next few weeks to discuss the next steps in the development of the Local Plan.

Yours faithfully

Patrick Blake, Area 3 Spatial Planning Manager

Highways England | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

Tel: +44 (0) 300 4701043 | **Mobile:** + 44 (0) 7825 024024

Web: <http://www.highways.gov.uk>

GTN: 0300 470 1043

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Highways England Company Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |

<https://www.gov.uk/government/organisations/highways-england> | info@highwaysengland.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

Consider the environment. Please don't print this e-mail unless you really need to.

HISTORIC ENGLAND

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	MR	
First Name	MARTIN	
Last Name	SMALL	
Job Title <i>(if applicable)</i>	PRINCIPAL ADVISER, HSITORIC ENVIRONMENT PLANNING	
Organisation <i>(if applicable)</i>	HISTORIC ENGLAND	
Address 1	EASTGATE COURT	
Address 2	195-205, HIGH STREET	
Address 3		
Town	GUILDFORD	
Post Code	GU1 3EH	
Telephone	01483 252040	
E-mail	martin.small@historicengland.org.uk	

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

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

Paragraph 1.2.5

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

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

Historic England welcomes paragraph 1.2.5 on the historic environment of 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.

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:

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

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

1.5 Evidence and technical reports

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

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

Paragraphs 158 and 169 of the National Planning Policy Framework 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 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.

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.

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.

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:

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

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

The Vision

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

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

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.
--

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	<input type="checkbox"/>	No	<input type="checkbox"/>
-----	--------------------------	----	--------------------------

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:

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

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

2.2 Objectives

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

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

Historic England welcomes and supports Objective 6 "*Maintain and enhance the historic, built and natural environment of the Borough through investment and high quality design.....*" 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.

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	<input type="checkbox"/>	No	<input type="checkbox"/>
-----	--------------------------	----	--------------------------

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:

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

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

Paragraph 3.25

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

Is legally compliant?

Yes

No

Is sound?

Yes

No

Fulfils the duty to co-operate?

Yes

No

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.

Historic England welcomes the reference in paragraph 3.2.5 to the heritage interest in the central area and the recognition that 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).

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:

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

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

Paragraph 3.2.11

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

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

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.

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.

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*".

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:

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

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

Policy CC7 and paragraph 4.1.29

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

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

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 paragraphs 126 and 157 of the National Planning Policy Framework.

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	<input type="checkbox"/>	No	<input type="checkbox"/>
-----	--------------------------	----	--------------------------

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:

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

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

Heading 4.2

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

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

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.

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.

Retitle heading 4.2 "Built, Historic and Natural Environment".

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	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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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:

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

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

Paragraphs 4.2.1 - 4.2.24

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

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

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 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:

- *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];*

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 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 local architectural or historic interest). 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:

- *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.*

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 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.

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.

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 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)*".

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.

Historic England would wish to attend any discussion session on the historic environment, in order to clarify, if necessary, our comments, to assist the Inspector with any questions and to participate in discussions.

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:

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

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

Policy EN1

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

Is legally compliant? Yes No

Is sound? Yes No

Fulfils the duty to co-operate? Yes No

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.

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).

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:

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

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

Policy EN2

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

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

<p>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.</p> <p>However, the policy should be more accurately be titled "Sites of Archaeological Significance".</p> <p>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.</p> <p>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.</p> <p>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.</p>

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.

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 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."*

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.

Historic England would wish to attend any discussion session on the historic environment, in order to clarify, if necessary, our comments, to assist the Inspector with any questions and to participate in discussions.

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:



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

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

Policy EN3

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

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

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.

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.

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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:

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

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

Section 4.2

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

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

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.

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.

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).

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.

Historic England would wish to attend any discussion session on the historic environment, in order to clarify, if necessary, our comments, to assist the Inspector with any questions and to participate in discussions.

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:



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

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

Policy EN4

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

Is legally compliant?

Yes



No

Is sound?

Yes



No

Fulfils the duty to co-operate?

Yes



No

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.

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.

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:

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

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

Policy EN5

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

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

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.

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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy EN6

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy EN11

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

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

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 environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy EN13

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy H2

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

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

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.

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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy H8

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

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

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.
--

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.

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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:

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

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

Policy H9

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

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

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.

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.

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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:

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

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

Policy H11

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

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

Historic England welcomes the requirement in Policy H11 Development of private residential gardens that the proposal makes a 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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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B6. If you wish to appear in person, please briefly outline why you consider

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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:

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

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

Policy H13

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

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

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.
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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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy OU3

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

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

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 National Planning Policy Framework.

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:

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

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

Policy OU4

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

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

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.
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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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy OU5

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

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

Historic England welcomes the requirement in Policy OU5 Shopfronts and Cash Machines that <i>"Features that positively contribute to the character of the building and street will be retained and, where possible, restored"</i> 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.
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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.

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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:

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

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

Paragraphs 5.1.1, 5.1.2 and 5.1.7

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

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

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.

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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Paragraph 5.2.1

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

Is legally compliant?

Yes

No

Is sound?

Yes

No

Fulfils the duty to co-operate?

Yes

No

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.

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.

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:

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

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

Paragraph 5.2.11

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

Is legally compliant?

Yes

No

Is sound?

Yes

No

Fulfils the duty to co-operate?

Yes

No

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.

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.

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:

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

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

Policy CR2

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

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

Historic England welcomes Policy CR2, particularly attribute d), but we would also welcome a further attribute: " <i>Development will conserve and enhance the historic environment of the centre and the heritage assets therein</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.
--

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
-----	--------------------------	----	--------------------------

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:

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

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

Paragraph 5.3.5

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

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

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.

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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR3

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

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

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 " <i>...and the significance of heritage assets...</i> ".

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR9

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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:

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

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

Policy CR11

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

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

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.
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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.

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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:

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

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

Policy CR11a

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR11b

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR11c

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

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

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.

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:

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

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

Policy CR11d

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

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

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.
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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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Paragraph

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

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

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 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.
--

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:

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

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

Paragraph 5.4.11

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

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

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.

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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR12

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

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

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 " <i>which should inform the development</i> " added to the end of criterion vi) and the commitment to include the protection of the listed buildings themselves as well.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR12c

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR12e

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

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

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.
--

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Paragraph 5.4.16

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

Is legally compliant?

Yes

No

Is sound?

Yes

No

Fulfils the duty to co-operate?

Yes

No

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.

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 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.

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:

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

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

Paragraph 5.4.19

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

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

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.

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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR13

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

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

Historic England welcomes, criteria v) and vi) of Policy 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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR13a

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

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

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.

These comments are without prejudice to any comments we may wish to make on any proposals for re-use.

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.

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 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.

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.

Historic England would wish to attend any discussion session on the historic environment, in order to clarify, if necessary, our comments, to assist the Inspector with any questions and to participate in discussions.

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:

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

Historic England welcomes the requirement in Policy 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.

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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR14g

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR14h

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR14i

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

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

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.
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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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR14j

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR14k

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

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

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 National Planning Policy Framework.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR13c

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

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

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 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.

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.

The addition of a requirement to Policy CR13c for the conservation and enhancement of the setting of the listed buildings adjacent to the site.

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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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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:

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

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

Paragraphs 5.4.26 and 5.4.29

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

Is legally compliant?

Yes

No

Is sound?

Yes

No

Fulfils the duty to co-operate?

Yes

No

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.

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.

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:

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

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

Policy CR14b

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR14c

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

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

Historic England welcomes the requirement in Policy CR14c for development to avoid detrimental impacts on the significance 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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR14d

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

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

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.
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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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR14e

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR14I

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

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

Historic England welcomes the requirements in Policy CR14I 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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR14m

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR15

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

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

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.
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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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy 5.4.40

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

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

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.
--

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CR16

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

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

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 paragraphs 126 and 157 of the National Planning Policy Framework.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Paragraphs 5.4.41 and 5.4.42

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

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

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.

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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy SR2

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

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

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.
--

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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy SR3

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

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

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.
--

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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy SR4a

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

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

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.
--

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy SR4b

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

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

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.
--

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy SR4c

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

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

Historic England welcomes the requirement in Policy SR4c 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.
--

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
-----	--------------------------	----	--------------------------

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:

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

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

Policy SR4d

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

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

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.

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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy SR4e

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

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

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.
--

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy SR4f

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

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

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.
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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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Paragraph 7.2.1

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

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

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.

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:

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

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

Paragraph 7.2.7

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

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

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.

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:

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

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

Policy WR3c

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy WR3e

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

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

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.
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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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy WR3g

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

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

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.
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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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy WR3i

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

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

Historic England welcomes the requirement in Policy WR3i 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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy WR3p

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

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

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.

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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy WR3q

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

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

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.

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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy WR3s

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy WR3t

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

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

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 by paragraphs 126 and 157 of the National Planning Policy Framework.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Paragraph 8.1.5

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CA1a

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

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

Historic England welcomes the requirement in Policy CA1a 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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CA1b

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CA1c

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CA1d

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CA1e

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CA1f

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

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

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 " <i>which should inform the development</i> " added to the end of the fourth bullet point.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy CA2

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

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

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.

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:

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

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

Paragraphs 8.3.6, 8.3.8 - 8.3.11

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

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

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.

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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Paragraph 9.1.4

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

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

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.

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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Paragraph 9.2.1.

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

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

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".

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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Paragraphs 9.2.3 and 9.2.6

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

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

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.

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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy ER1b

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

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

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.
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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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy ER1c

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

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

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 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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy ER1d

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy ER1e

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy ER1g

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy ER1h

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

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

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.

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy ER1i

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

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

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.
--

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy ER1j

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

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

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.
--

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

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

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

Policy ER3

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

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

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.
--

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.

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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	<input type="checkbox"/>	No	<input type="checkbox"/>
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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:

HOLLAND, JOHN

From: John Holland
Sent: 24 January 2018 12:39
To: Planning Policy
Subject: Draft Local Plan

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

Reading Borough Council - Pre-Submission Draft Local Plan

Under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

November 2017

I wish to make representations regarding specific sections of the RBC Local Plan, particularly in the context of the protection of public green open space where other priorities occur, such as the desire to build a new school. The sections I wish to make representations about are CC7, CC8, CC9, EN7 and RL6. I fully support Mr Martin Brommell's representations (as amended) which, for the avoidance of any doubt, I confirm hereunder.

CONTEXT

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.

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: *"The following Local Green Spaces (LGS) and Public Open Space (POS), as shown on the Proposals Map, will be protected from development. 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".*

Given that RBC have chosen to ignore such policies in the current local plan what guarantee can be given that they will adhere to any or all such policies in the future?!

REPRESENTATIONS

I wish to challenge the following sections of the Draft Local Plan specifically against the ESFA case to build The Heights school on MPF.

CC7 Design & The Public Realm Developments

The ESFA school proposal will:

- 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 properties which are in close proximity situated in Hewett Avenue, Hewett Close, Blgrave Lane, A4074 Upper Woodcote Road.

- 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.

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:

- 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
- Totally inadequate parking

CC9 Securing Infrastructure

The highest priority should be given to:

- The loss of open space
- Green infrastructure, vital to health and well-being for all age groups
- Protection against the adverse effect to biodiversity

EN7N Local Green Space & Public Open Space

- MPF, referenced EN7Nn is classified as LGS (Local Green Space) for the entire area of 10.86 hectares
- Item 4.2.2.5 states *“The National Planning Policy Framework states that local communities, through local plans, are able to identify Local Green Space for specific protection which is of particular importance to them. The aim of this policy is therefore to define the boundaries of Local Green Space, based on the criteria in the NPPF. Local Green Spaces can only be designated during local plan preparation or review and must be capable of enduring beyond the end of the plan period.”*
- 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 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 effect 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 cause 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.

RL6 Protection of Leisure Facilities and Public Houses

This section states:

- *“Existing leisure facilities (or public houses) outside the Central Area will generally be retained, and there is a strong presumption in favour of retaining leisure facilities (or public houses) where they are the only facility of their type in a district, major local or local centre. Developments that would result in the loss of a leisure facility (or a public house) outside the Central Area will not be permitted unless it can be clearly demonstrated that:*

- *a. There is no need for this type of facility in this area; or*
- *b. The function of the facility can be adequately fulfilled by an existing facility, or a facility proposed as part of the development, where that facility would be at least as accessible to the same catchment; or*
- *c. The impacts on amenity of residents of retaining the facility could not be dealt with through other measures, and would be so severe as to outweigh the benefits to the wider community of retaining the facility.*

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 the 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.

John Holland

Click [here](#) to report this email as spam.

HOLT, GRAHAM

From: G HOLT
Sent: 24 January 2018 18:19
To: Planning Policy
Subject: ref: Local Plan, Section EN7N Item EN7Nn. (Mapledurham Playing Fields).

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

Dear Sir,

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 processed.

I am deeply concerned that the various parties involved with decision making on this issue all 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 Reading Council. It is held in Trust for the benefit of ALL for recreation purposes. Due to the fact that a 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 it's 'Trust status' and no consideration for the needs of local residents and visitors. There also seems to be little respect for current recreational 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 expediate this Application.

Secondly - and should this school be built, then it is feared that the amount of traffic this will generate for 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 this 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 Mapledurham Playing Fields from the threat of the EFSA proposal?

This also raises the question of why 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 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.

Yours Sincerely.

Graham Holt.

HOME BUILDERS FEDERATION

Sent by email to: planningpolicy@reading.gov.uk

26/01/2017

Dear Sir/ Madam

Response by the House Builders Federation to the Reading Pre-Submission Local Plan

Thank you for consulting the Home Builders Federation (HBF) on the Pre-Submission Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

We would like to submit the following representations on the Local Plan and we would welcome, in due course, participating in hearings of the Examination in Public.

Whole Plan Viability

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 not be available during the consultation and would only be published in submission to the Secretary of State. This approach is unacceptable as it fails to give the development industry the opportunity to submit comments on the viability of a 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. Alongside the concerns regarding the approach taken to plan preparation we do not consider this to be a legally compliant approach to regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Regulation 19(a) states that the local planning authority “*must make a copy of each of the proposed submission documents ... available in accordance with regulation 35*”. Details of what is considered to be a “*proposed submission document*” are set out in Regulation 17. Part (e) of Regulation 17 establishes that supporting documents used in the preparation of the local plan should be considered as submission documents. Given the paragraph 173 of the National Planning Policy Framework requires Council to consider the implications on viability of policies in the local plan we would consider the

viability assessment to be a key supporting document that should have been published as part of the regulation 19 consultation.

Duty to Co-operate

The plan is unsound as the Council have failed to address how its unmet needs will be accommodated.

The duty to co-operate is both a legal and policy requirement to ensure that key issues, such as housing delivery, are considered at a strategic level to ensure the necessary co-operation between authorities when preparing local plans. In particular the NPPF in paragraph 179 outlines that:

“Joint working should enable local plan authorities to work together to meet development requirements which cannot wholly be met within their whole areas – for instance because of a lack of capacity or to do so would cause significant harm to the principles and policies of this Framework.”

The NPPF also states in paragraph 181 that this co-operation should result in:

“a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development”

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 Housing Market Area (HMA) have recognised that Reading's unmet needs of 644 homes over the plan period will need to be accommodated elsewhere in the HMA. However, there is no indication as to where and when this need will be met. The Local Plan merely states the Council will continue to work with neighbouring authorities in the Western Berkshire HMA to ensure the shortfall is delivered.

However, the Duty to Co-operate statement outlines that neither of these authorities have indicated whether or not they will have 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 Memorandum of Understanding agreed between the Council's 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 the needs **should** be met within the HMA but there are no agreements 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 Council's as 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 that 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.

H1: Housing Provision

The policy is currently unsound as it is inconsistent with national policy

The OAN

The Berkshire and South Bucks Strategic Housing Market Assessment states that the Objectively Assessed Housing Needs for Reading to be 699 dwellings per annum for the plan period 2013 to 2036. This assessment of need used the 2012 based DCLG Household Projections as the demographic starting point and then makes a series of adjustments to take account of economic growth, a return to pre-2008 migration patterns and the need to address affordability.

Demographic starting point

We would not disagree with the Council's use of the 2012 based projections. Since the preparation of the current SHMA the Government have published the 2014 based household projections which show the slight decrease in household numbers during the plan period of 25 homes per annum. However, we would not consider this to be materially different and as such the Council are justified in their continued use of the 2012 projections.

London migration adjustment

We would support the adjustment of 68 homes per year that has been made to the demographic starting point to reflect the expectation that migration between the HMA and capital is likely to revert to pre-2008 levels. The level of housing delivery in London has been significantly below the London Plan target of 42,000 dpa. However, even the delivery of 42,000 dpa would appear to be unachievable given the latest monitoring report published by the GLA indicates delivery of conventional housing (self-contained flats and houses) for the 2015/16 period as being 32,919¹. This degree of under provision in the Capital will also be a driver of further out-migration alongside reducing the amount of in-migration from those areas surrounding the capital as set out above. If the right homes are not available to meet growing needs then there will be little option but for these households to move to those areas surrounding the capital.

¹ Para 2.21 London Plan Annual Monitoring Report 2015/16 (July 2017).
https://www.london.gov.uk/sites/default/files/amr_13.pdf

Economic growth

It is also evident in the SHMA that economic growth will play a significant role in driving housing needs across the HMA. It is essential that housing needs are consistent with economic growth scenarios. Whilst we have broadly welcomed the Government's decision to introduce a standard methodology for assessing housing needs we do consider it to have a number of shortcomings. One of these is its failure to recognise the need to ensure housing delivery is sufficient to meet the economic growth expectations of an area. PPG is clear that economic growth is a key factor in establishing housing needs and Council's must ensure their final OAN reflects this position.

Table 63 of the SHMA indicates that the level of jobs growth in the Borough will need to be supported by 689 new homes every year (though this is reduced to 642 to take account of Bracknell Forest's demographic based OAN being greater than its employment based OAN). The approach taken by the Council is to include this as an uplift to the SHMA of 33 dpa rather than to consider this against the demographic starting point and the uplift for market signals to ensure housing delivery can support employment growth. However, the OAN in the SHMA of 699 homes would be sufficient to meet the economic expectations of the Borough.

Market Signals

We do not consider the uplift of 57 dpa that has been made to take account of market signals to be sufficient. It is just 10% of the demographic starting point of 541 dpa and does not reflect the market signals set out in then SHMA. Since the publication of the PPG, the approach taken to market signals and the degree to which Councils have responded to these signals has varied considerably. The PPG provides no detail as to the how much of an uplift is necessary in relation to the nature of market signals in area. Until recently the only guidance came from the Local Plan Expert Group who suggested uplifts of over 25% where affordability ratios showed house prices were more than 8 times local salaries.

However, this lack of clarity on market signals has now been partly addressed with the publication of 'Planning for the Right Homes in the Right Places' in September 2017. This consultation set out the Government's proposals for assessing housing need using a standard methodology. Whilst this consultation and the methodology cannot be given any significant weight there we consider it to provide evidence as to the degree which the Government thinks market signals relating to affordability should be used to uplift baseline demographic projections. It is clear from the consultation that where affordability ratios show house prices to be more than four times local salaries then an uplift should be applied. The degree of uplift is also significant and, for example, where house prices are 8-time median salaries the uplift should be 25%. This approach is more in line with the approach suggested by the Local Plan Expert Group rather than the relatively limited response that has been made in many SHMAs since the introduction of PPG.

The market signals for Reading would suggest that the current uplift of 10% is not sufficient and fails to provide the response to affordability concerns that is expected by Government. Both median and lower quartile resident affordability ratios are high at 8.98 and 10.64 respectively². On the basis of the Government's proposed uplifts in 'Planning for the Right Homes in the Right Places' the Council would be expected to apply uplifts of greater than 31% to their demographic starting point. It is not just affordability ratios that suggests a 10% uplift for market signals is insufficient. House prices have seen rapid increases in recent years. Lower quartile house prices have increased by 67,500 since 2013. This suggests that affordability is as much to do with rising house prices as to their relative value against the back drop of low wage inflation.

Conclusion on housing needs

Taking into account the various uplifts that have been included within the assessment of housing need and the clear drive the Council have effectively uplifted OAN to 28% of the 2012 based demographic starting point. This is a similar level of uplift to that which would be expected if the Government's approach to market signals set out in 'Planning for the Right Homes in the Right Places' where to be applied. We therefore 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 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 in this representation there will be a need to ensure that there are mechanism to ensure that the Council reviews the Local Plan should the other authorities in the HMA not be able to address this shortfall.

H2 density and mix

The policy with regard to self and custom build housing is unsound as it is not effective

Whilst we do not have any issues to raise with regard to the policy in general we do not consider the approach to the implementation of the self and custom build element as set out in paragraph 4.4.14 of the supporting text to be effective. In line with PPG the Council only require applicants to consider making appropriate provision for self or custom build housing. This is consistent with paragraph 57-025 which states that

² Source: Office for National Statistics

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 for self and custom housebuilders. The formula is also ineffective and unfair as it could potentially place a greater burden on developments coming forward later on in the plan period should the list grow disproportionately.

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 the relevant regulation and reserve the right to comment in more detail at the examination in public. Other comments relating to the soundness of this policy 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 less 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 square meters. These were initially set out in the ministerial statement of 28th of November which following judicial review were given legal effect on the 13 May 2016. In the judicial 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:

“the disproportionate burden of planning obligations on small-scale developers, custom and self-builders”

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, they 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 it 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 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.

Size, type and tenure mix of affordable housing

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.

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.

Space standards (Part a)

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:

- Need – evidence should be provided on the size 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.

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 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.

Zero carbon homes and dwelling emissions rates (part c and d.)

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 2015³, the Treasury's 2015 report 'Fixing the Foundations'⁴ 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.

³ www.gov.uk/government/speeches/planning-update-march-2015

⁴ <https://www.gov.uk/government/speeches/fixing-the-foundations-boosting-britains-productivity>

Accessible homes (part e and f)

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 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 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.

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 of the Council's functions as a Local Planning Authority. We would therefore suggest that the wording of this paragraph be amended to read:

"Where justified, necessary and related to the development the Council may require contributions towards the monitoring and implementation of planning obligations."

Conclusions

At present we do not consider the plan to be sound as considered against the tests of soundness set out in paragraph 182 of the NPPF. We do not consider the Council has met the tests of soundness in the following key areas:

- Failure to meet the needs of the HMA in full with insufficient mechanisms established in policy to ensure unmet needs are addressed in future. Policy H1 must be amended to require a review of the Local Plan if unmet needs are not met by the other authorities in the HMA
- Policy H3 on affordable housing is not consistent with national policy
- The adoption of the optional technical standards set out in policy H5 have not been justified as required in PPG.
- Requirement for all developments making a planning contribution to pay an administrative charge is not justified or consistent with national policy and should be amended.

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully

Mark Behrendt
Planning Manager – Local Plans

Home Builders Federation
Email: mark.behrendt@hbf.co.uk
Tel: 020 7960 1616

HOWARD, BETHAN

From: Bethan Howard
Sent: 25 January 2018 22:02
To: Planning Policy
Cc:
Subject: Local Plan pre-submission consultation- my comments

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

To RBC

My response to the consultation on the local plan refers to proposed development on Reading Golf Course land at Kidmore End Road Emmer Green -

Section 8.3 CA1b Part of Reading Golf Course - Kidmore End Road

- 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 (eg from local retirement housing).
- high increase in air pollution and significant risk to health, especially children and risk of severe illness and premature death to all local population
- 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

Regards
Bethan Howard

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HOWES, MICHAEL

From: Michael Howes
Sent: 24 January 2018 09:39
To: Planning Policy
Subject: Consultation on Local Plan Section EN7N Item EN7Nn

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

Dear Reading B. C.

I wish to make the following comments with reference to the draft Local Plan Section EN7N Item EN7Nn:

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:
 - 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, footballers, casual visitors
 - i. Hours of operation
 - j. Reduction to the quality of the environment
4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

Regards.

Michael Howes.

HUTT, KIM

From: Kim Hutt
Sent: 25 January 2018 14:27
To: Planning Policy
Subject: Local plan section EN7N Item EN7Nn

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

1) what plans are there to be committed to the current local plan and protect Mapledurham playing Fields from the threat of the EFSA proposal.

2) why is the current plan being ignored in favour of RBC supporting the proposal to build a school on the Mapledurham playing fields .
This field is designated green space and held in TRUST exclusively for recreation.

3) How will the local plan be strengthened to overcome future threats to green open space , especially when it is held in trust ?

4) How will it safeguard against the following factors.

Which cannot be mitigated and will impact on the Mapledurham playing fields if the EFSA proposal is implemented

Invasion of privacy.

Visual dominance and overbearing on residents in the area in which they propose to build.

Privacy and overlooking

Traffic movements

Air pollution

Noise pollution

Impact to other users like the tennis club , dog walkers, footballers and casual visitors.

It would be out of character with the local area.

Light pollution.

Great reduction on the quality of the environment.

Kind regards Mrs Kim Hutt

HUTT, MR AND MRS K.A.

From: Keith Hutt
Sent: 23 January 2018 19:07
To: Planning Policy
Subject: Fwd: Protect MPF from New Heights school.

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

From: Keith Hutt
Date: 23 January 2018 at 19:00:58 GMT **Subject:**
Protect MPF from New Heights school.

Dear sirs ,

I understand that RBC are Consulting on the Draft Local Plan that was put in place to Protect MPF from being Built on ?? , in my view this should have taken place at the beginning of the proposed to prevent this ever going to planning , as I have said in all my corespondents that RBC have there own Agenda and have ignored the current plan in favour of ESFA's proposal , AS Trustees RBH are totally aware that MPF is Designated Green Open Space and held in Trust Exclusively for Recreation ,

If you change the plan for a new one how will the new plan be Strengthened to protect our green open space , Especially when it is held in trust ?.

In particular how will it safeguard against the following factors , which cannot be mitigated and will significantly impact MPF if EFSA proposal is implemented .

1) Traffic movement ,2) Air Pollution 3) Noise Pollution 4) Visual dominance and overbearing on the area of the site where they propose to build 5) Privacy and overlooking 6) out of character with local residential properties 7)Light Pollution 8) impact to other users like tennis club , dog walkers , footballers ,casual visitors 9) hours of operation 10) reduction to the quality of the Environment .

Can you Demonstrate you commitment to the current local plan and protect Mapledurham playing field from this threat of the EFSA proposal.

As Trustees you must protect our open spaces at all times which in my view you have failed terribly , you can not be the judge and jury !!

This is why I fill there's a definite conflict of interest in this case .

Regards
Mr&Mrs K A Hutt

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JAMIESON, BRIAN

24 January 2018

Reading Borough Council
Planning Department

Dear Sirs

Pre-Submission Draft Local Plan

I wish to comment on one aspect of the Pre-Submission Draft Local Plan.

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. Reading Borough Council, as Trustee of MPF, is currently considering the approach from the ESFA.

The current Reading Local Plan, provides some protection against this unwelcome development. Policy CS28 states:

Development proposals that will result in loss of open space or jeopardise its use or enjoyment by the public will not be permitted.

To date, it is unclear whether or how this policy is bearing on the proposal from the ESFA. It seems not to have discouraged Reading Borough Council, 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 states:

The following local green spaces (LGS) and of public open spaces (POS) will be protected from development. 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

Happily, MPF is included in the extensive list of Reading's LGS and POS that follows, as EN7Nn. 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 Department.

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

Yours faithfully

Brian Jamieson

Tel: 0118 954 6652
E-mail: brian@jamiesononline.com

JARAKANA, NANCY

From: Nancy Jarakana
Sent: 24 January 2018 13:20
To: Planning Policy
Subject: Mapledurham Playing Fields

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

Dear Sir/Madam,

I am extremely concerned about the plan to break the trust and build on Mapledurham Playing Fields. Please could you answer the following questions?

- 1.
2. Why the current Local Plan is 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:
 - 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, footballers, casual visitors
 - i. Hours of operation
 - j. Reduction to the quality of the environment
4. What plans are there to demonstrate commitment to the current Local Plan and protect Mapledurham Playing Fields from the threat of the EFSA proposal?

Yours faithfully,

N Jarakana

Click [here](#) to report this email as spam.

JONES, NICK

From: Nick Jones
Sent: 25 January 2018 16:17
To: Planning Policy
Subject: Reading Golf Club

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

Hello,

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.

Thanks for the opportunity do so during your consultation, appreciated. I used to run similar consultations in central government.

My objections are as follows.

Emmer Green is bursting at the seams when it comes to infrastructure. We moved to the area in Summer 16 and had to send our 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 Wal3s 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 round about with Pepperdine Roaf. My wife has witnessed accidents near there too. Bikes hit by cars. Again, traffic pressure 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 Highdown Hill Road. It is one of only two non public highway ways to cycle into Reading district. It is used by cyclists from Kidmore End to commute into Reading. It is also used by leisure cyclists 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 too to avoid having to cycle in the extremely dangerous Peppard Road 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 wel as golf, the course provides leisure for walkers dog walkers and others. It has a right of way which provides great link that allows circular walks from Emmer Green and Caversham. I have Also cross country skied on it 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, of possible archaeological interest.

I hope this helps inform your decision.

Cheers

Click [here](#) to report this email as spam.

K2 DEVELOPMENTS LTD

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		Mr
First Name		Peter
Last Name		Lawson
Job Title <i>(if applicable)</i>		Director
Organisation <i>(if applicable)</i>	K2 Developments Ltd	Turley
Address 1		The Pinnacle, 20 Tudor Road
Address 2		Reading
Address 3		
Town		
Post Code		RG11NH
Telephone		01189022830
E-mail		Peter.lawson@turley.co.uk

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

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

Please see supporting written representations

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 checked="" 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 see supporting written representations

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 see supporting written representations

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.

We consider it necessary to provide clarification on matters raised within our representations at the Local Plan Examination.

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:

**Representations to the Pre-
submission Reading Borough Local
Plan**

29-35 Station Road, Reading

January 2018

Turley

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Contact

Peter Lawson / Hannah Bowler

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24 Jan 2018

1. Introduction

- 1.1 These representations have been prepared on behalf of K2 Developments Ltd in response to the consultation on the Reading Borough Council Pre-submission Draft Local Plan (Regulation 19) and in relation to its land interests at 29-35 Station Road, Reading, which is being promoted through the emerging Local Plan for a mixed use development incorporating a hotel, offices and retail.
- 1.2 These representations focus on matters pursuant to the soundness of the Pre-submission draft Local Plan and those matters which are of particular relevance in the context of our Client's land interest. For the most part the response relates to:
 - 29-35 Station Road - Site Considerations;
 - Central Reading - Spatial Strategy;
 - Policy Approach to Town Centre Development;
 - Development Management Policies; and
 - Tests of Soundness.
- 1.3 In addition, these representations set out the specific merits of our Client's site at '29-35 Station Road' and its ability to support the Council in meeting its strategic objectives and aspirations for the Central Reading area.
- 1.4 Furthermore, whilst many of the objectives from the adopted Development Plan are being taken forward into the new Local Plan, there are specific policies which require further clarification and consideration prior to the submission of the Local Plan to the Secretary of State in March 2018.

2. 29-35 Station Road, Reading

- 2.1 The site is located within Reading Town Centre to the south of Reading Station and is in one of the most accessible part of the town. The site is clearly visible on arrival at the new southern interchange at Reading Station. The site is set forward from the building line of Thames Tower when looking southwards from the station and forms part of a series of mixed uses along Station Road.
- 2.2 The site is bound by Garrard Street to the north and Station Road to the east. Garrard Street currently provides vehicular and pedestrian access to the NCP car park and existing buildings along Garrard Street, albeit access for vehicles from Garrard Street to Station Road is limited to solely taxi access.
- 2.3 The site abuts Thames Tower to the north of the site which has been recently refurbished with a four storey extension (Planning Ref: 141043) to provide office accommodation with ground floor retail uses and has included improvements to the public realm around this area of Reading Station.
- 2.4 To the west the site abuts a servicing area for a mix of uses where the building frontages are positioned along Station Road or Friar Street, alongside a 6 storey residential building known as Garrard House (secured via permitted development rights) and now incorporates an additional 3 storeys of apartments under permission Ref: 160328. The existing building to the south of the site is known as Brunel House and is a 7 storey 1980's red brick office building.
- 2.5 This area of Reading is already identified for substantial regeneration over the coming years with the consented development at Station Hill (Planning References: 130440 and 090622) lying directly to the north of the site (slightly to the west of the Station). Indeed, development of up to 23 storeys is proposed to come forward as part of the wider regeneration of this area. The Station Hill proposal incorporates a mix of uses including office, residential and retail.
- 2.6 Station Road itself is the principle pedestrian route from Reading railway station through to the primary shopping area within the town centre along Broad Street, however in its current form there is no sense of arrival or clear legibility which links to the two areas, especially given a number of key sites (including 29-35 Station Road) are in need of redevelopment.
- 2.7 There are a number of listed buildings within close proximity to the site including:
 - Great West House (Grade II) - now occupied as a Malmaison Hotel with a Starbucks at ground floor;
 - 13 and 15 Station Road (Grade II);
 - The statue of King Edward VII (Grade II); and
 - Main building of Reading Station (Grade II).

- 2.8 The site is highly accessible given the proximity to Reading Station which provides trains services to London Paddington, Manchester, Bristol and further afield but also as it is located along Station Road which is a principal bus route for services across the Reading area and further afield.

Site Description

- 2.9 The existing site extends to 0.4ha and is rectangular in shape. The site is currently occupied by a 1950s seven storey office building with a ground floor retail unit which we understand has been entirely vacant since 2015. The sixth and seventh storeys are recessed from the Station Road façade with the north elevation currently a blank brick façade. The building is in need of redevelopment and is currently boarded and not accessible to the public.
- 2.10 The front elevation (east) onto Station Road is positioned along the main thoroughfare from Reading Station to the Town Centre (Broad Street) with the rear of the site accessed from Garrard Street with a stepped access to the rear entrance of the building.
- 2.11 There is vehicular access to the rear of the site from Garrard Street which serves a number of buildings including Garrard House (residential), Projection West and East (residential) and Novotel (leisure) and formerly vehicular access for the site was also taken from Station Road.

Status of the site within the adopted Development Plan

- 2.12 The adopted Development Plan identifies the site within the following designations:
- Air Quality Management Area;
 - Areas of Archaeological Potential;
 - Central Core;
 - Station River Major Opportunity Area;
 - Office Core;
 - Existing Active Frontage; and
 - Allocation RC1a (Friar Street and Station Road).

Planning History

- 2.13 The site has been subject to a detailed planning history which has sought to redevelop the site for a range of uses including residential, with proposals up to 29 storeys in height.
- 2.14 Planning permission was granted in August 2005 under reference 04/01395/FUL (which was subsequently subject to an extension of time under reference 10/00902/EXT) for the *'Demolition of existing building and the erection of a 22 storey building comprising 103 residential units, two ground floor Class A1 retail and/or Class A3 restaurant units,*

with a basement level providing car/cycle parking spaces and refuse storage'. We understand that this permission was never implemented.

- 2.15 Since this time, several planning applications have been submitted for the redevelopment of the site and subsequently withdrawn prior to determination on the grounds of unresolved technical matters. We have noted these below:

Planning Reference	Development Description	Status
08/00150/FUL	Redevelopment to provide a 29 storey hotel with ancillary facilities, including a restaurant, bar, meeting rooms and conferencing facilities.	Withdrawn
151962	Demolition of existing building and erection of mixed use residential-led building providing retail on ground and first floor with 110 residential apartments above in a 23 storey building	Withdrawn 24th February 2016
161919	Demolition of existing building and erection of mixed use residential-led building providing retail on ground and first floor with 107 residential apartments above in a 23 storey building.	Withdrawn 23 March 2017

- 2.16 It is clear that there has been a consistent desire for a significant quantum of development to be realised on the site and deliver the Council's adopted Development Plan aspirations for the site.

- 2.17 Since this time, K2 Development has acquired the site and is committed to bringing forward a high quality development that will regenerate a highly visible site within the town centre. The intention is to work towards meeting the Council's objectives for this area of the town centre and address previous technical elements which have inhibited the delivery of the site in the past.

Emerging Local Plan

- 2.18 The emerging Pre-submission draft Local Plan proposals map identifies that the site is located within the following:

- The Central and Office Core (Policy CR1);
- A major opportunity area boundary;
- The Station Hill/ River MOA Policy CR11 and CR11a;
- A Tall Buildings Cluster (CR10);

- An area for a new primary frontage within the Central Core; and
- An archaeology priority area.

2.19 The emerging Local Plan is supportive of the redevelopment of the site under draft policy CR11a albeit these representations seek to address a series of matters associated with the specific wording of the draft policy to ensure flexibility in proposals come forward within the plan period. We consider that such amendments will assist in ensuring that the policy meets the tests of soundness under paragraph 182 of the Framework.

Site Proposals

2.20 Our Client is seeking to pursue development proposals for the comprehensive redevelopment of the site for a mix of uses appropriate for its town centre location. This includes the provision of retail uses to assist in delivering a strong active frontage along Station Road, with the upper floors supporting a hotel led development (Use Class C1) with opportunities for delivering additional office uses (Use Class B1a) reinforcing this area of Reading as a visitor destination.

3. Central Reading - Spatial Strategy

- 3.1 The emerging Pre-submission draft Local Plan seeks to replace all existing policies within the adopted Development Plan, with the Reading Central Area Action Plan (2009) of particular relevance in light of our Client's interest within Central Reading. Our Client's site has been vacant and in need of redevelopment for a number of years and despite numerous attempts by previous owners of the site, has failed to secure a deliverable planning permission. We consider this position is reflective of a number of key sites across Central Reading, and therefore the emerging Local Plan needs to ensure that the policies are reflective of the interests of *'public, voluntary and private sector organisations'*¹ to ensure that the Plan is deliverable to 2036.
- 3.2 The emerging Pre-submission draft Local Plan identifies Reading as *'one of the most economically dynamic regions in the country'*² with Reading Town Centre *'one of the UK's most important centres'*³ with Reading Station *one of the busiest stations outside London and which will mark the western extent of the Elizabeth Line'*. These are all factors that should reflect the spatial strategy contained within the new Local Plan.
- 3.3 Paragraph 3.2.1 of the Pre-submission draft Local Plan recognises that there is a need to focus development opportunities within the urban areas and to ensure an efficient use of land, with Central Reading a focus for medium and high density development. We support this position as it reflects a *'positive vision for the future'*⁴ and will assist in supporting the viability and vitality of the town centre through a mix of uses⁵ and support the Local Plan objectives.
- 3.4 In addition, the continued allocation of sites which have failed to come forward within the adopted Plan period within Central Reading and are suitable for high density development and meeting the needs for town centre uses within this location is supported. This will continue to assist in fostering greater economic growth to 2034 and *'secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities'* in line with paragraph 8 of the Framework.
- 3.5 However, these undeveloped/ vacant sites (including our Client's site) referenced above within Central Reading, and in close proximity to Reading Train Station, that have yet to be viably redeveloped within the current plan period still have the potential to contribute to the vitality of the town centre. These are clearly opportunities where the Council should be seeking to deliver *'positive improvements'* especially with regard to the built environment where the objectives of paragraph 9 of the Framework can be fully achieved.
- 3.6 Whilst, we acknowledge that the Reading 2050 vision is a key element of the emerging Local Plan which seeks to create a 'successful city region' (paragraph 2.1.3), we consider that this should be further interrogated with developers and investors who are

¹ Paragraph 173 of the Framework

² Paragraph 1.2.3 of the Pre-submission Local Plan

³ Paragraph 1.2.4 of the Pre-submission Local Plan

⁴ Paragraph 17 of the Framework

⁵ Paragraph 23 of the Framework

active on sites in the Reading area⁶. This is particularly relevant to those sites which have benefitted from site allocations since 2009 and have failed to come forward despite the policies contained within the Central Area Action Plan. This will assist in demonstrating paragraph 173 of the Framework is addressed through ensuring that *'sites and the scale of development identified in the plan should not be subject to a scale of obligations and policy burdens that their ability to developed viably, is threatened'*, especially given such sites are integral to meeting the Council's objectives for the town over the plan period.

- 3.7 As such, we consider it imperative that the emerging Local Plan policies are clear and supportive of development coming forward on key development sites within the town centre to ensure that *'decisions on planning applications can be made with a high degree of predictability and efficiency'*⁷, to enable development to come forward on sites which are integral to the spatial strategy.

⁶ PPG (Reference ID: 2b-002-20140306)

⁷ Paragraph 17 of the Framework

4. Policy Approach to Town Centre Uses

- 4.1 Within this Section, we consider the approach taken within the Pre-submission draft Local Plan to identifying appropriate locations for 'town centre uses' and whether the draft policies accord with the requirements of paragraph 182 of the Framework with regard to the 'test of soundness'.

Town Centre Uses - Draft Policy CR1

- 4.2 Draft policy CR1 (Definition of Central Reading) considers appropriate locations for town centre uses and seeks to provide its own local threshold for the application of the sequential test. However, as currently drafted we do not consider that it accords with the requirements of the Framework at paragraph 26 for a number of reasons as explored below.
- 4.3 Firstly, 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, as currently drafted, the Pre-submission Local Plan fails to define a town centre boundary for Reading (as required under paragraph 23 of the Framework).
- 4.4 In addition, Policy 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 proposals map (as per the definition of town centre within the Framework) which allows 'main town centre' uses to come forward within these areas without the need to apply the sequential test.
- 4.5 The approach identified above, would allow for areas outside of the defined town centre - but within the Central Reading area, to be subject to the local threshold of the sequential test (supported by paragraph 24 of the Framework) to re-inforce the town centre first approach contained within the Framework, and ensure that there is opportunity for the Central Reading area to accommodate any town centre use needs that cannot be wholly met within the town centre over the plan period.
- 4.6 With regard to the first point which relates to the policy requirement that '*retail development will take place in the Primary Shopping Area*', this position is consistent with the requirements of the Framework. Furthermore, we support the Council's reference to the need for additional retail in the area to the north of the existing shopping core around the station, which currently lacks a significant proportion of ground floor active uses (para 5.2.9). Our Client's site is within this area and forms part of an existing designated primary frontage, both of which from a policy perspective would support future proposals for retail uses at ground floor level to encourage active uses along Station Road.
- 4.7 With regard to the location of 'major office development' referenced within Policy CR1, we would highlight that paragraph 26 of the Framework only requires the sequential assessment to be applied on sites outside of town centres. This further reinforces the need to establish and define the town centre boundary.

- 4.8 We also consider that the restriction of 1,000sq m of office accommodation could be applied outside of a defined town centre boundary within the wider Central Reading area. The Local Plan, as proposed at draft policy CR7, restricts office accommodation within the town centre to upper floors which would be a more appropriate and justified policy.
- 4.9 With regard to reference to 'other town centre uses' noted at bullet point 3 of the policy, the same position applies. This policy does not accord with the Framework without a defined town centre boundary given this is where 'main town centre' uses⁸ will be acceptable (paragraph 24 of the Framework). Whilst within the town centre, the Council can indicate a preference for specific town centre uses, i.e. within the Central Core/ Office Core as currently included within the draft Plan, the current policy restricts development for main town centre uses coming forward on sites which could undermine the economic growth of Reading town centre and fail to promote beneficial competition. (PPG: ID:2b-001-20140306).
- 4.10 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, as proposed by the LPA, and present a road map to its delivery. At present, the proposals map fails to *'illustrate geographically the application of policies within the development plan'*.⁹
- 4.11 We consider that the phrasing of the above policy requires further clarity especially with regard to the designation of the Central Reading Area, and the specific town centre boundary within which the sequential test will not apply. The draft Local Plan does not include clear town centre policies. We would point to the Framework in this regard which states at paragraph 23 that LPA's should 'define the extent of town centres and primary shopping area' in drawing up Local Plans'. This is currently not incorporated into the draft policies and leads to confusion over areas where development will be permitted, thereby failing to accord with paragraph 154 of the Framework.

Primary Frontages - Central Reading

- 4.12 The retention and creation of new primary frontages within Central Reading (draft policy CR7) is supported, although as noted above should be within the context of a town centre boundary. The inclusion of this policy will ensure the concentration of retail development within the main shopping area supporting the vitality of the town centre for convenience and comparison goods retailing. In addition, the identification of new primary frontages along key public transport routes within Reading also provides opportunities for areas where redevelopment is envisaged to come forward and contribute to the vibrancy of the street scene in these locations.

Leisure

⁸ Uses defined within the Framework: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

⁹ PPG ref:ID: 12-002-20140306

- 4.13 Our Client is fully supportive of the Council's vision for the town centre to *'continue as a regionally important shopping and business location, but its role will be widened as a place for culture, leisure and entertainment, as well as a place to live'* (page 14).
- 4.14 Paragraph 4.6.8 recognises that Central Reading is not only one of the most accessible locations in the Borough but in fact amongst the most accessible in the South East, and is the best location for major development of this type. As such, the inclusion of appropriate policies to guide future development within the town centre will be integral to meeting the specific needs identified over the plan period and ensuring development in the most appropriate locations.
- 4.15 Draft Policy RL2 identifies the requirement for 34,900sq m of retail and related facilities in Reading Borough to 2036, together with new leisure facilities. We consider this is integral to ensuring that Reading remains competitive with surrounding towns and maintains its competitive advantage. The policy anticipates that new leisure and retail will come forward within the Central Core which is the most suitable part of the Centre, reflective of our Clients intentions at Station Road.
- 4.16 Further reference is made to *'major retail and town centre leisure development, including evening economy uses, will take first precedence, followed by, to a more limited extent, offices'* (paragraph 5.2.7) within the 'centre'. This position is reinforced within draft policy CR4 (Leisure Culture and Tourism in Central Reading) which focusses such development within the Central Core. We support this broad location for such uses albeit consider that the continued reference to the 'town centre'¹⁰ is misleading without defining this area in policy terms (as previously mentioned).
- 4.17 However we would also note that the area provides significant opportunities for visitor accommodation, tourism and leisure and would urge that this is incorporated into the supporting text. This further reinforces the need for a town centre boundary given visitor accommodation and leisure uses should be focussed within the main town centre area and in close proximity to key transport hubs. Given the areas high accessibility, there are clear opportunities to enhance this area of Reading as a visitor destination.

Underused buildings

- 4.18 The Pre-submission draft Local Plan focusses on the redevelopment of underused sites within the Central Reading Area with paragraph 5.2.12 discussing that there are three major opportunity areas where there are low-quality and underused areas that would benefit from high quality, well-designed new development'. This includes the Friar Street/ Station Road Area within which our Client's site is situated. We agree with this observation and the premise accords with paragraph 17 of the Framework.
- 4.19 However, we feel it prudent to stress that given the emerging Local Plan in the main reflects former allocations with the Central Area Action Plan (AAP) which have failed to come forward to date, that wording of policies pursuant to site allocations should allow flexible land uses to come forward (paragraph 157 of the Framework) to avoid compromising the viability or deliverability of key sites within the town centre which are integral to meeting the Local Plan objectives.

¹⁰ Paragraph 5.3.14 of the draft Local Plan

- 4.20 Furthermore, on account that many of the AAP sites have failed to come forward within the existing plan period there needs to be commitment from the Local Planning Authority to *'work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.'*¹¹, especially through the determination of applications. This would ensure that *'the relationship between decision-taking and plan-making should be seamless, translating plans into high quality development on the ground'*¹², which is required to realise the development potential of the proposed allocations contained within the Local Plan.

Tall Buildings within Central Reading

- 4.21 The Pre-submission draft Local Plan identifies that *'new tall buildings have been developed in the centre, and, with further tall buildings already permitted, the skyline of Central Reading is set to transform'* (paragraph 5.1.1.4) and our Client is wholly supportive of the position that tall buildings have a role to play in building on Reading as the dynamic and creative core of the capital of the Thames Valley (paragraph 5.3.35).
- 4.22 Draft policy CR10 (Tall Buildings) sets out that tall buildings are defined as 10 storeys of commercial floorspace or 12 storeys of residential (equating to 36 metres in height) or above. This policy has been taken forward from the AAP and is supported.
- 4.23 The continued allocation of the Station Area Cluster (Policy CR10a), an area identified for potential for tall buildings, is further supported given the significant scope to deliver high density and high quality developments within the most accessible area of the town, whilst also adding to the sense of arrival at the southern interchange of Reading Station. Our Client supports this area being *'signified by the highest buildings and the densest cluster, due to its proximity to the station and public transport interchange'*.¹³
- 4.24 The reference within the policy to the *'pattern of the tallest buildings at the centre of the cluster, close to the station'* is supported, and our Client's site represents a significant opportunity to deliver a landmark building at the heart of the cluster, in a location which is directly visible upon arrival at Reading Station.
- 4.25 In addition, Station Road itself requires enhanced legibility within the streetscene given it is the gateway site to the main retail area along Broad Street and a wayfinder to the centre of the town. Opportunities within this location to change the town's skyline through taller buildings will assist in reinforcing Reading as a regional centre and making the most efficient use of limited land within the town centre.
- 4.26 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.

Station/ River Major Opportunity Area

- 4.27 The continued identification of the Station/River Major Opportunity Area (draft policy CR11) is supported and the delivery of significant new development within this area will

¹¹ Paragraph 187 of the Framework

¹² Paragraph 186 of the Framework

¹³ Paragraph 5.3.39 of the draft Local Plan

create a destination which can *'make the fullest possible use of public transport'*¹⁴. Our Client's site can play an important role in delivering this objective and can deliver a leisure-led mixed use development early within the plan period.

- 4.28 The site is identified within the sub-area of Friar Street and Station Road - draft policy CR11a. The policy fails to identify a site specific boundary based on 1.36 ha on the proposals map. This matter needs to be clarified to aid the delivery of the site.
- 4.29 In terms of specific policy wording, the reference to *'active retail and leisure uses on the ground floor'* is supported and accords with our Client's aspirations for 29-35 Station Road. We further support the broad identification of a 'mix of uses' on upper floors as this provides an opportunity for a range of town centre uses to come forward subject to viability. The policy would further accord with acceptable uses along the new primary frontages along Station Road contained within draft policy CR7.
- 4.30 However, we do not support the specific allocation of *'150-270 dwellings, no significant net gain in offices or retail and leisure'*. This is on the basis, that whilst provision could be made for residential development across this area, the reference to *'no significant net gain in offices or retail and leisure'* directly contradicts with the main thrust of the Pre-submission draft Local Plan (specifically policies RL2 and CR4) and fails to recognise that the town centre, and specifically this location within the Central Core, is appropriate for such uses.
- 4.31 To further clarify, the wording of the allocation directly contradicts policy CR4 (Leisure, Culture and Tourism in Central Reading) which envisages that the Central Core will be the prime focus for leisure and tourism development. Paragraph 23 of the Framework requires that local planning authorities *'allocate a range of suitable sites to meet the scale and type, of retail, the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres.'* The inclusion of a reference to no significant net gain fails to accord with the Framework and could inhibit sites coming forward that would assist in meeting the specific needs identified within the Retail and Leisure Study (2017) and more importantly bring a vacant and derelict site back in to active use.
- 4.32 Furthermore, draft policy RL2 is clear that there is a need for up to 34,900sq m of new retail, leisure and cultural floor space, with the supporting text (4.6.8) identifying that the centre is the most accessible location for major development of this type to come forward. The intention for the Station Area to become a destination in its own right (included at draft policy CR11), will not be achieved through stating that there will be no net gain in leisure and retail opportunities to the north of the Station as this will detract from creating a vibrant central quarter within this location. We strongly resist the narrow wording of Policy CR11a in this respect.
- 4.33 As such, we urge the Council to remove reference to no net gains in leisure and retail opportunities within sub area CR11a. This is on the basis, that CR11a provides opportunities for new development to reinforce Reading as a visitor destination and will encourage people/visitors to be drawn into the town centre (to the south) along a key movement corridor and considerably enhancing the underwhelming approach to the

¹⁴ Paragraph 17 of the Framework

town centre that currently exists along Station Road. The proposed mix of uses should not be restricted in these uses and all 'main town centre' uses as defined within the Framework, should be acceptable.

- 4.34 Of note, is that of the 9 sub-areas contained within proposed allocations, only two identify potential for additional leisure development, both of which are to the north of the station and less accessible than sites directly in front of Reading Station looking southwards where there is stronger demand for leisure and tourism uses. In addition, the identification of this Opportunity Area as area location where tall buildings would be supported, further lends itself to opportunities for a range and mix of uses to come forward within single buildings, and as such the policy does not '*optimise the potential of the site to accommodate development*' and '*create and sustain an appropriate mix of uses*' in line paragraph 58 of the Framework.
- 4.35 The allocation fails to recognise that large sites within the sub-area are in desperate need of regeneration, vacant in the most-part and failing to contribute to the street-scene in an area which is highly visible on entering Reading from the train station. As such, it is considered that the policy is too restrictive when the Council should be pro-actively encouraging the redevelopment of these sites to contribute to the spatial objectives of the Local Plan, whilst also balancing the delivery of new residential development with the identified need for other uses within the town centre.
- 4.36 In light of the above, we consider that to ensure flexibility and a diverse portfolio of investment in the area, the reference to no net gain in offices, leisure or retail should be removed, not least as this is a direct contradiction to the main wording of the policy within CR11a. These amendments would ensure that the Policy accords with paragraph 17 of the Framework by '*promoting mixed use development, and encouraging multiple benefits for the use of land in urban areas*', whilst also allowing the policy to be '*flexible to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances*', a matter which has stifled development coming forward over the current plan period. This would further allow appropriate development to come forward in a viable way and ensure the deliverability of sites in line with paragraph 173 of the Framework

5. Development Management Policies

5.1 We have provided comments on the draft Development Policies below:

Draft Policy	Wording	Turley Comment
CC2 (Sustainable Design and Construction)	<p>Proposals for new development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock, will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.</p> <p>To meet these requirements:</p> <p>All major non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM 'Excellent' standards, where possible;</p> <p>All minor non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM 'Very Good' standard as a minimum;</p> <p>All non-residential development or conversions to residential should incorporate water conservation measures so that predicted per capita consumption does not exceed the appropriate levels set out in the applicable BREEAM standard. Both residential and non-residential development should include recycling greywater and rainwater harvesting where systems are energy and cost</p>	<p>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.</p>

effective.

CC6 (Accessibility and the Intensity of Development)	The scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations. Unless it can be demonstrated that the accessibility of a site is to be significantly upgraded, for example, by providing high quality pedestrian routes or providing access to good public transport services, any new development must be at a scale, density and intensity appropriate to that level of accessibility.	Our Client supports this policy.
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EN14 (Trees, Hedges and Woodland)	Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended. The quality of waterside vegetation will be maintained or enhanced. New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.	We consider that tree coverage should be reference as 'improve the level of tree coverage, <u>where appropriate</u> ' given some sites are tightly constrained and such improvements will be limited.
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EM1: (Provision of employment	Provision will be made for a net increase of 53,000-112,000 sq m of office floorspace and 148,000 sq	We support the provision of additional employment floorspace within the Borough especially within Reading Town
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development)	m of industrial and/or warehouse space in Reading Borough for the period 2013 to 2036.	Centre in line with the objectives of the Framework.
	Development that would exceed the levels of employment development set out in this policy, after existing permissions and allocations are accounted for, will need to either: (a) demonstrate that it will not result in additional need for local housing; or (b) mitigate its impacts on the need for local housing, either through the provision of additional residential or through contributions to affordable housing.	
EM2: (Location of new employment development)	Major office development will take place in the centre of Reading and along the A33 corridor. Office development will also take place in the other centres in the network set out in Policy RL1, but should be of an appropriate scale to those centres.	We support this policy subject to comments raised at Section 4 of this Statement.
RL1: (Network and Hierarchy of Centres)	<p>Regional Centre; Reading</p> <p>The vitality and viability of these centres should be maintained and enhanced. Some centres are based around a small area of green, and where this is an important part of the layout and function of the centre, it will be retained and where possible enhanced. The following improvements will be acceptable in all centres:</p> <ul style="list-style-type: none"> • Accessibility and transport improvements; • Broadening range of facilities; • Residential use of upper floors; and • Environmental enhancements. 	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 levels of change albeit consider a distinction should be made between Central Reading and Reading Town Centre as noted as Section 4.

Central Reading will see the greatest levels of development and change. Development and change, including intensification of town centre uses, will also take place within smaller centres in line with the role of the centre in the network. The smaller centres which are expected to be the main focus for intensification, change and additional community facilities will be The Meadway and Whitley District Centres.

6. Test of Soundness

- 6.1 As currently drafted, whilst our Client is broadly supportive of the content of the draft Plan and its objectives, there are a number of policies which need further clarification to ensure that they meet the test of soundness as required under paragraph 182 of the Framework.

Policy	Comments
Draft policy CR1	<p>As currently drafted, the proposal fails to be consistent with the application of the sequential assessment in line with national policy and nor is it justified given 'main town centre uses' should be appropriate within the town centre and the sequential test should not be applied. The lack of flexibility for mixed uses to come forward across the Central Reading area will likely compromise the redevelopment of vacant, disused sites where alternative uses are considered viable and deliverable.</p> <p>The policy is not considered to be effective nor consistent with national policy as required under paragraph 182. We consider that with further clarification as suggested within Section 4, the tests of soundness could be achieved.</p>
Draft policy CR4	<p>As drafted, there is requirement for further clarification over the town centre boundary and consistency with the proposed allocations as to where retail and 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 needs can be accommodated within the Local Plan.</p> <p>As currently drafted, the policy is not considered to be positively prepared, justified or effective nor consistent with national policy as required under paragraph 182. We consider that with further clarification as suggested within Section 4, the tests of soundness could be achieved.</p>
Draft policy CR11a	<p>The policy should remove reference to 'no net gain in retail and leisure' as this is an overly restrictive policy for the town centre and not consistent with policy CR4. This is not the most appropriate strategy for the Station/ River Opportunity Area given the significant</p>

redevelopment opportunities that exist to reinforce the Station Area as a destination in its own right where the provision of significant retail, tourism and leisure facilities will support delivering this objective.

The policy is not considered to be justified or effective nor consistent with national policy as required under paragraph 182.

KING, MR AND MRS D.J.

Reading Borough Council

23 JAN 2018

Planning

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

20th January 2018

Pre Submission Draft Local Plan

To The Planning Team

We understand that the site designated CA1b part of Reading Golf course, is once again being considered amongst the sites identified for development or change.

This site is clearly an amenity area of long standing and is ~~also~~ very much an integral part of the social environment of this village, with many important trees which add to the surroundings. 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, health care and water supply which Emmer Green can not handle

Yours sincerely

READING BOROUGH CC

25 JAN 2018

PLANNING

Mr. Mr. J.J. King

From: Gill King
Sent: 18 February 2018 15:36
To: Bell, Alison
Subject: Reading Golf Club Development

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

To: Alison Bell <alison.bell@reading.gov>
Cc: Jane Stanford-Beale <jane.stanford-beale@reading.gov.uk>, Simon Robinson <Simon.Robinson@reading.gov.uk>, Tony Page <tony.page@reading.gov.uk>, "Clare Grashoff" <clare.grashoff@reading.gov.uk>
Subject: Reading Golf Club Development

18th February 2018
For the attention of Director of Environment and Neighbourhood Services at RBC.

Dear Alison

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 guidances when there are so many brown field sites available in Reading.

Kind Regards

Gillian and Denis King.

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